**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF COLORADO**

Civil Action No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

XOXOXO,

 Plaintiff(s),

v.

XOXOXO,

 Defendant(s).

**PLAINTIFF’S INTERROGATORIES**

Under Rule 33 of the Federal Rules of Civil Procedure, Plaintiff directs these interrogatories to Defendant to be answered fully in writing and under oath within thirty days. These Interrogatories are continuing and require supplemental responses as provided by Rule 26(e) of the Federal Rules of Civil Procedure.

The words “me” and “my” refer to the Plaintiff.

The words and “you” and “yours” refer to the Defendant.

The words “Adverse Action” mean [describe the thing you say in your Complaint that the Defendant improperly did, like harassing, firing, demoting, or not hiring you]

The word “Discrimination” means [insert the type of illegal conduct you say in your Complaint that you experienced like (1) gender discrimination; (2) race discrimination; (3) age discrimination; (4) disability discrimination; (5) religious discrimination; (6) national origin discrimination; (7) sexual orientation discrimination; (8) sexual harassment; (9) hostile work environment; and/or (10) retaliation]

**Interrogatories:**

1. Describe your decision to take Adverse Action against me, by saying when you decided, providing all reasons for the decision, identifying all decision makers, and listing all information or policies you relied on in deciding.
2. Identify all documents supporting your decision to take Adverse Action against me, and for each specify the language supporting your decision.
3. Describe all attempts to notify me of any deficiencies in my performance or conduct during my employment, including any discipline, coaching, counseling, or performance management, whether verbal or written.
4. Identify all others you taken Adverse Action against for the same reason(s) you took the Adverse Action against me.
5. Describe every complaint of or expression of concern made to you about Discrimination, whether formal or informal, verbal or written, internal or external.
6. List and provide contact information for everyone who worked with me during while I was working for you.
7. Identify each person who has taken over my position (or any part of my duties) since I left.
8. Describe all communications you (including but not limited to human resources staff and management officials) had with me about the concerns I raised about issues in the workplace (including but not limited to the concerns I describe in the complaint).
9. Describe any investigation you made into the concerns I raised, including: a) Say what type of investigation you did; b) list the individuals you interviewed; c) list who did the investigation; d)list all documents you reviewed for the investigation; and e) provide the result of the investigation, including if any discipline, reprimand, warning, or counseling occurred. (If you did not do an investigation, please say so.)
10. Describe every instance of discipline, coaching, counseling, or performance management, whether verbal or written, given to [insert name of person responsible for illegal conduct]*.*
11. Describe each complaint (formal or informal, verbal or written, internal or external) made by anyone about me.
12. Describe all compensation and benefits you provided to me.
13. Identify the person(s) most knowledgeable about my employment.
14. Describe all training you provided to employees related to Discrimination during my employment.
15. Describe all of your policies and procedures, whether verbal or written, related to Discrimination in place during my employment.

### For every affirmative defense in your Answer: a) describe all evidence upon which you base the affirmative defense; b) state the names, addresses, telephone numbers and email addresses of all persons with knowledge of those facts or evidence; and c) identify all documents and other tangible things which support or relate to your affirmative defense.

1. Describe all efforts you took to preserve documents and communications related to me and my employment
2. Identify each person you intend to call as a witness at trial, either in person, through deposition testimony, or through an affidavit and for each person, provide: a) The witness's full name and address; b) the witness's relationship to you; and c) a summary of his or her expected testimony.
3. List each person who helped to prepare answers to these discovery requests, and for each describe how they helped.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

NAME

ADDRESS

PHONE

E-MAIL

*Pro Se*

**CERTIFICATE OF SERVICE**

I certify that on Day, Month, Year, I served this by putting it in United States mail, first class postage prepaid, addressed to:

|  |  |
| --- | --- |
| NAMEADDRESSCITY, STATE, ZIPE-MAIL \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_NAMEADDRESSPHONEE-MAIL*Pro Se*  |  |