

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

WILLIE CARL SINGLETON, a minor )  
by NEVA SINGLETON, his mother )  
and next friend, et al., )

Plaintiffs, )

-vs- )

BOARD OF COMMISSIONERS OF STATE )  
INSTITUTIONS, et al., )

Defendants. )

TALLAHASSEE CIVIL ACTION  
NO. 963

FILED

SEP 9 1966

OBJECTIONS TO INTERROGATORIES

OFFICE OF CLERK  
J. S. DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA

TO: Honorable Earl M. Johnson  
Honorable Jack Greenberg and Leroy D. Clark

Attorneys for Plaintiffs


The Defendants in the above-styled action, by and through their undersigned attorneys, object to the written Interrogatories served herein by the abovementioned Plaintiffs on August 31, 1966, as follows:


1. To Interrogatories Nos. 1 through 46 on the ground that they impose a vexatious and harassing burden on Defendants.
2. To Interrogatories Nos. 1 through 46 on the ground that they are being used in an oppressive manner requiring the execution by the Defendants of difficult and expensive tasks in searching for facts and classifying and compiling data.
3. To Interrogatories Nos. 1 through 46 on the ground that the information requested in each of the said interrogatories is more properly obtainable by oral depositions.
4. To Interrogatories Nos. 1 through 21, 24, 25, 30, 33, 36 through 38, 40 through 46 on the ground that the

information requested in each of the said interrogatories is a matter of public record and available to the Plaintiffs who have the right to inspect such records themselves.

5. To Interrogatories Nos. 3 through 12, 13(c)(d), 14 (c)(d), 15 through 17, 20, 21, 24 through 46 on the ground that the information requested therein is not entirely relevant to the issues raised by the pleadings; and to the remaining Interrogatories on the ground that the relevant information is contained in exhibits attached to Defendants' Answer heretofore filed.

WHEREFORE, Defendants move this Honorable Court for an order striking out all of the said Interrogatories and excusing them from answering said Interrogatories.

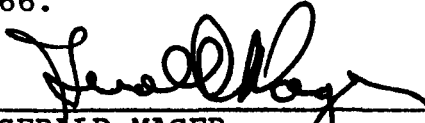
  
EARL FAIRCLOTH  
Attorney General

  
GERALD MAGER  
Assistant Attorney General

Attorneys for Defendants  
Capitol Building  
Tallahassee, Florida 32304

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Objections to Interrogatories was mailed to Honorable Earl M. Johnson, 625 West Union Street, Jacksonville, Florida, and the Honorables Jack Greenberg and Leroy D. Clark, 10 Columbus Circle, New York, New York 10019, Attorneys for Plaintiffs, this 9<sup>th</sup> day of September, 1966.

  
GERALD MAGER  
Assistant Attorney General