

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

FILED

SEP 16 1966

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

OFFICE OF CLERK
U. S. DISTRICT COURT
NORTH. DIST. FLA.

-vs-

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

TALLAHASSEE CIVIL ACTION
NO. 963

OBJECTIONS TO SUPPLEMENTAL INTERROGATORIES
OBJECTIONS TO ADDITIONAL SUPPLEMENTAL
INTERROGATORIES

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 Supplemental Interrogatories served herein by the above-mentioned Plaintiffs on September 9, 1966, and object to the written Additional Supplemental Interrogatories served herein by the above-mentioned Plaintiffs on September 16, 1966, as follows:

1. To Supplemental Interrogatories Nos. 1 through 3 and to Additional Supplemental Interrogatories Nos. 1 through 17 on the ground that they impose a vexatious and harassing burden on Defendants. On August 31, 1966, the Plaintiffs previously served some 46 Interrogatories necessitating some over 100 responses to which Defendants filed their objections on September 9, 1966. Said Interrogatories coupled with the request for Supplemental Interrogatories and Additional Supplemental Interrogatories

involved over 60 specific requests necessitating over 150 responses. It should be noted that a substantial number of the requests for Additional Supplemental Interrogatories are repetitious and redundant as they were previously embodied within Plaintiffs' original request for Interrogatories served on August 31, 1966.

2. To Supplemental Interrogatories Nos. 1 through 3 and Additional Supplemental Interrogatories Nos. 1 through 17 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 Supplemental Interrogatories Nos. 1 through 3 and Additional Supplemental Interrogatories Nos. 1 through 17 on the ground that the information requested in each of the said Interrogatories is more properly obtainable by oral depositions.

4. To Supplemental Interrogatories Nos. 1 through 3 and to Additional Supplemental Interrogatories Nos. 1 through 7, 9, and 12 through 17 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 Supplemental Interrogatories Nos. 1 through 3 and to Additional Supplemental Interrogatories Nos. 1 (a), 2 (a), 3 (a), 4, 5, 6, 7, 8, 9 (b), (c), (d), 10, 11, 12 (b), (c), (d), 13 (b), (c), (d), 14 (b), (c), (d), 15, 16, and 17 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

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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 16th day of September, 1966.


GERALD MAGER
Assistant Attorney General