

**SUPERIOR COURT OF CALIFORNIA, SACRAMENTO COUNTY**

GORDON D SCHABER COURTHOUSE- LIMITED CIVIL

CAPITAL ONE BANK (USA) N.A.	)	
	)	
Plaintiff,	)	
	)	Case No. xx-2011-xxxxxx
	)	
Joe Consumer,	)	
	)	
Defendant.	)	

**DEFENDANT'S FIRST SET OF INTERROGATORIES DIRECTED  
TO PLAINTIFF**

COMES NOW Defendant, by counsel, and propounds the following interrogatories on Plaintiff,  
to be answered in accordance with Your State Rules:

**INTERROGATORIES**

1. State each ADDRESS at which you received mail during the last 5 years (for the purpose of this  
interrogatory, ADDRESS means the street number, street name, city, state, and zip code).

ANSWER:

2. Identify your contact information (for the purpose of this interrogatory, IDENTIFY as it related to contact information , means to provide the 10 digit phone number at your primary residence, your cell phone number, your employment phone number, and any other number at which you could be reached by phone).

ANSWER:

3. Is it your contention that you did not APPLY for credit with as set forth by the plaintiff in the plaintiff's complaint (for the purpose of this interrogatory, APPLY means either sign an application, complete a phone application, or complete an online application.

ANSWER:

4. If your response to the preceding Interrogatory No. 3 is other than an unqualified negative, then state with specificity any and all facts that support your response.

ANSWER:

5. Is it your contention that you did not agree to the terms of a written agreement with when you applied for credit.

ANSWER:

6. If your response to the preceding Interrogatory No. 5 is other than an unqualified negative, then state with specificity any and all facts that support your response.

ANSWER:

7. Is it your contention that you did not use the credit you received from as set forth by the plaintiff in the plaintiff's complaint.

ANSWER:

8. If your response to the preceding Interrogatory No. 7 is other than an unqualified negative, then state with specificity any and all facts that support your response.

ANSWER:

9. Is it your contention that you were not obligated to the terms set forth in a written agreement with when you used the credit provided to you by

ANSWER:

10. If your response to the preceding Interrogatory No. 9 is other than an unqualified negative, then state with specificity any and all facts that support your response.

ANSWER:

11. Is it your contention that you paid all that you owed on the account identified in the plaintiff's complaint as account number with last four digits xxxxxxxxxxxx1234.

ANSWER:

12. If your response to the preceding Interrogatory No. 11 is other than an unqualified negative, then state with specificity any and all facts that support your response.

ANSWER:

13. Is it your contention that you owe the plaintiff less than the outstanding amount set forth by the plaintiff in the plaintiffs complaint.

ANSWER:

14. If your response to the preceding Interrogatory No. 13 is other than an unqualified negative, then state with specificity any and all fact that support your response.

ANSWER:

15. Is it your contention that you did not receive billing statements from concerning the account identified in the plaintiffs complaint as account number with last four digits xxxxxxxxxxxx1234

ANSWER: