September 26, 2024

\*\*\*\*\*

Client address

 RE: *Case Name*

Case No

 **Interrogatories and Responses.**

Dear \*\*\*\*:

 Enclosed is the State’s interrogatory and the request for production. Please review and answer any many of the questions as fully as you can and send it to me. Not everything you write down will be disclosed, as some of the information is privileged and protected, and we intend to make objections where appropriate. However, for the purpose of establishing our own defense, I would like you to answer as many of them as possible and as fully as possible. Obviously, there are some questions only we as your lawyers can answer.

We have 30 days to answer it. So, we will have until \*\*\*\* to answer them.

 Use separate sheets of paper if you need to. However, please **remember that draft answer is directed ONLY to us, your lawyers, and that draft answer is privileged**. You are not to share that draft answer or to discuss them with anyone else at all. Not all the draft answer will end up in the final product, as some of the questions are clearly objectionable, and sometimes privileged. We will talk about that. Once you receive this, give me a call.

 Thank you.

 Very truly yours,

 HART JARVIS MURRAY CHANG PLLC

 Kenneth M. Chang

Attorney at Law

CC

Enc.