

EXHIBIT A
COURT'S INTERROGATORIES TO INDIVIDUAL PLAINTIFF(S)

Residence address.

Name of current employer and place of employment.

Date(s) and time(s) that you visited the facility.

Purpose of your visit(s) and duration of your stay(s).

4a. 1) What is the proximity of the business to the plaintiff's home/place of employment

2) Describe the plaintiff's past patronage of defendant's business

3) Describe the definiteness of the plaintiff's plans to return

5. Did anyone else accompany you? If so, who?

6. Describe the nature of your disability.

7. Specifically list each of the architectural barriers which you personally observed or experienced at this facility.

8. Did you take notes or make a contemporaneous record of these barriers? If so, please attach a copy to these Answers.

9. Please list any other Title III cases in which you have been a party in this District.

Name of Plaintiff

STATE OF FLORIDA
COUNTY OF _____

The foregoing instrument was acknowledged before me by means of ___ physical presence or ___ online notarization, by _____, who being first duly sworn, deposes and says that he/she has read the foregoing Answers to Interrogatories, knows the contents of same, and to the best of his/her knowledge and belief, the same are true and correct.

SWORN TO AND SUBSCRIBED before me by means of ___ physical presence or ___ online notarization, on this _____ day of _____, 2024.

NOTARY PUBLIC

Notary Stamp

Signature of Person Taking Acknowledgment
Print Name:
Title: Notary Public
Serial No. (if any):
Commission Expires:

COURT'S INTERROGATORIES TO CORPORATE PLAINTIFF(S)

1. What is Plaintiff's business address?

2. When and where was Plaintiff incorporated?

3. Who are the current officers and directors of Plaintiff?

4. Provide the name and address of any of Plaintiff's members who have attempted to access and use the subject premises in the past, but have been discriminated against because of architectural barriers in violation of the ADA.

5. For each member listed in answer to No. 3 above, provide:
 - a. The date(s) and time(s) that each member visited the facility

 - b. The purpose of the visit and duration of stay

 - c. What is the proximity of the business to the plaintiff's home/place of employment

 - d. Describe the plaintiff's past patronage of defendant's business

 - e. Describe the definiteness of the plaintiff's plans to return

 - f. The names of any person(s) who accompanied the member

- g. The nature of the member's disability
- h. The architectural barriers personally observed or experienced
- i. Whether such member(s) took notes or made a contemporaneous record of these barriers, and if so, please attach a copy to these answers.

6. Please list any other Title III cases in which Plaintiff has been a party in this District.

By: _____

As its:

Print Name

STATE OF FLORIDA
COUNTY OF _____

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SWORN TO AND SUBSCRIBED before me by means of ___ physical presence or ___ online notarization, on this _____ day of _____, 2024.

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