



- b) Unless otherwise stated, these Interrogatories refer to the above-captioned action and/or the claims made therein, and/or to the attachments to the Verified Complaint of said action and/or other attachments to this action of which you and/or your attorney have received copies.
- c) Where name and identity of a person or Parties is required, please state the full name, home address, and also business address, if known, and also include any known phone numbers, email addresses, and websites associated with said person.
- d) Where knowledge or information in possession of Parties is requested, such request includes knowledge of the Parties agents, representatives, and unless privileged, his attorney's. When answer is made by corporate defendant, state the name, address and title of persons supplying the information and making the affidavit, and announce the source of his or her information.
- e) The pronoun "you" refers to the Parties to whom the Interrogatories are addressed and the Parties mentioned in clause (d).
- f) "*Identify*" when referring to Parties, including but not limited to, an individual, corporation, or other entity, shall mean to set forth the name and telephone numbers, and if a corporation or other entity, its principle place of business, or if an individual, the present or last known home and mailing address, and if applicable, his or her job title or titles, by whom employed and the address of the place of employment.

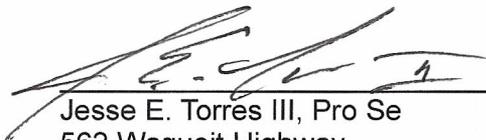
### INTERROGATORIES

1. Identify the person, persons or Parties answering or supplying information used in answering these Interrogatories.
2. Identify any Parties that you are aware of that has personal knowledge of any of the facts and circumstances of the above-captioned action, including but not limited to:
  - a) family members Donald F. Torres, Sophie J. Torres, Joseph J. Torres, Mary C. Torres, George and/or Eleanor Collie, Frank Souza Jr., Mary Ellen Pimental, Lorraine Corrairo, Henry Parent, Chris Parent, your Mother, and,
  - b) any Parties associated with, or who received benefits from, the estate of Amelia Rose Torres, and is to include any persons or entities who have knowledge of the proceeds from the sale of any lands from said estate, including but not limited to, attorneys, accountants and bankers, or any other party who has knowledge of the taking of land by the Town of Falmouth for its now use as a Watershed, and the proceeds thereof, and,
  - c) any Parties that were associated with, received proceeds from, and/or made claims to or against, and/or received monies and/or assets from, the Estate of Lillian R. Souza (Souza/Sousa). Of specific note are those that were part of the threat of, or commencement of, any and all legal actions against said estate and/or you and/or your deceased grandfather (Jesse E. Torres Jr.) for claims and/or your actions when your grandmother, the Defendant Sophie J. Torres was the executor of said estate, or in association with said estate.
3. Did you shred, destroy, remove, erase, or in any way prevent or inhibit the discovery of, review

of, or could in any way prohibit or inhibit the admission of, any documents or items which do or may, pertain to this case, including but not limited to, those items requested in "*Plaintiff Jesse E. Torres III's First Request for Production of Documents from the Defendant Jesse E. Torres IV*".

4. Have you discussed the above-captioned action, or any of the items set forth herein, with any members of your family, including brothers, parents, aunts, uncles, 1<sup>st</sup>, 2<sup>nd</sup> or 3<sup>rd</sup> cousins and/or grandparents, or anyone else including but not limited to the other Defendants. If you answer in the affirmative, please state to the best of your knowledge, the time and place, and method of said conversation, (such as on the phone, in person, etc.) and the nature of such conversations.
5. If you are unable to answer any of these interrogatories, please state what, if any, documents or other information you require to complete your answers, including the name and address of each person or entity you have reason to believe has the information or documentation you need to complete such answers.
6. Identify any and all known mailing and physical addresses of your great uncle, the Defendant, Donald F. Torres, including but not limited to, addresses in Mexico or the United States, and is to include but not be limited to, any addresses said Defendant uses through any and all mail delivery services such as YET Mail or any other mail forwarding service that provides delivery of U.S. addressed mail to Mexico or any other country where the Defendant Donald F. Torres now lives.
7. Identify any and all locations where you have traveled, where you were accompanied by, or at said location when the Defendant Donald F. Torres was also there, for any period of time at said travel locations. This is to include the dates and times of said travel, the time period you were there, and any monies you spent for any services or expenses on the Defendant Donald F. Torres.
8. Identify any and all Parties to which you have communicated with, by any means, including but not limited to, by phone, email, fax, paper mail, document or any other means concerning and/or mentioning the Properties, which is to specifically include, but not be limited to, Grandma's House; and any construction, mortgages, loans, real estate agents, appraisers, maintenance of or by, permits applied for or issued, or any other items that would be considered to be of value by any normal Parties, concerning or mentioning Grandma's House.

Respectfully submitted,



Jesse E. Torres III, Pro Se  
562 Waquoit Highway  
East Falmouth, MA 02536  
(617) 291-0862

Dated September 1, 2011

**CERTIFICATE OF SERVICE**

I, Jesse E. Torres III, hereby certify that on September 1, 2011, I have served the Defendant Sophie J. Torres and Debtmerica, LLC, through their Attorney of Record, and Jesse E. Torres IV individually to his address on file, with this action, the above-captioned notice, by postage prepaid U.S. Mail.



Jesse E. Torres III, Pro Se