



INTERROGATORIES IN INDIAN CIVIL LITIGATION: LEGAL FRAMEWORK, JUDICIAL PERSPECTIVES AND EMERGING TRENDS

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ABSTRACT

The role of Interrogatories in the Indian civil litigation system. This article is an attempt to analyse in detail the role of "Interrogators". Detaining their common law lineage as well as their statutory underpinning in Order XI of the Code of Civil Procedure, 1908, it examines interrogatories both procedurally and strategically, as a means of eliciting information, procuring admissions and expediting trials. The article studies recent Indian case laws (such as the 'test of prejudice' and 'necessity test'), which are used to balance the rights of discovery and procedural justice. Contemporary reforms of increased technology, increased judge discretion, and rigorous compliance enforcement are emphasised. In addition, a comparative law perspective is provided through a comparison of practices in the US, UK, and Ireland. The policy recommendations suggest that qualitative discretion be harmonised with procedural innovation to make the system more efficient and just. This synthesis will help legal practitioners, scholars, and policymakers understand the current and future role of interrogatories, especially in the context of India's civil justice system.

Keywords: Interrogatories, Discovery, Order XI CPC, Judicial Discretion, Test of Prejudice.

MEANING OF INTERROGATORIES

Interrogatories outset means that when one party sends some written questions to the other party before the trial of the case, the other party has to answer under oath or penalty of perjury, usually within 30 days. In many states, there are basic form-type questions on a printed form, and if the case is specific, supplementary interrogatories can also be sent. Generally, lawyers prepare these questions, and the lawyer of the party that has to answer them helps them

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understand what the question means and how to answer it so that there is no wrong interpretation. If the meaning of a question seems unclear or irrelevant, an objection can be raised, either during the answer or at the trial. Most states have a limit on how many interrogatories can be asked without court permission, so as not to harass the other party. It is easy to ask these questions, but answering them can be quite difficult and time-consuming, and sometimes intentionally tough. In addition, parties can also send depositions (which are before a court reporter) or requests for admissions, which also have to be answered in writing.

In short, in law, interrogatories (i.e. requests for further information) are formal written questions sent by one party to another party. Their purpose is to clarify the facts of the case and to understand, before the trial, which facts will be kept in court.

INTRODUCTION TO INTERROGATORIES AND THE FRAMEWORK FOR UNDERSTANDING THEM

In the procedural part of civil cases, interrogatories are a tool that, on one hand, brings out the truth, and on the other hand, also ensures that the scope of investigation is not too broad. Interrogatories are basically written questions that one party sends to the other party, which have to be answered under oath. These questions become part of the evidence and can be used in a trial to prove facts, get admissions or challenge someone's statement.

According to the common law tradition, the basic principle of discovery is that "justice will be achieved only when all relevant facts are brought forward". The basis of interrogatories in India is Order XI of CPC, 1908, which gave the courts the power to ask the parties to answer written questions on the matters in dispute. As defined by Cornell Law School: "It is a formal set of written questions sent by a litigant to the other party, which are answered in written form under oath." Such tools are used in many legal systems around the world, from England to Australia.

The role of interrogatories is not just to collect facts, but also to have strategic and procedural goals that are beneficial to individual parties as well as the judicial system as a whole. Marquette Law Review, the main goal of interrogatories is to force parties to state their positions clearly and specifically, which removes confusion in the dispute. Especially in complex commercial cases, where multiple transactions and relationships are involved, interrogatories are a great help in bringing clarity. The second important use is: taking admissions. If a party admits a fact, there is no need to formally prove the issue at trial, saving

time and cost. Modern courts are now focusing on fast-track and efficient trials, where such tools are useful.

The Supreme Court had clarified in the *P. Balan vs Central Bank of India* case that interrogatories should not be used to unnecessarily harass anyone. Only those questions can be asked which are necessary for the case, not for any fishing expedition. In the *Raj Narain vs Indira Nehru Gandhi* case, it was pointed out that courts do have the power to allow interrogatories, but they should be used judiciously. It is important to maintain a balance: discovery rights on one hand and avoiding misuse on the other.

In the *Tara Batra vs Poonam A. Kumar* case, the court said that interrogatories should be limited to relevant issues only and should not become an unnecessary burden for any party. Similarly, in the *Govind Narayan vs Nagendra Nagda* case also the court highlighted relevance and proportionality. Interrogatories are a very unique discovery tool. While deposition is for face-to-face questions, interrogatories consist of written questions and written answers, which are framed in a well-thought-out manner. It is used to establish foundational facts, obtain admissions, and get a party to take a fixed position which is difficult to change at trial.

Courts have recognised that discovery will be effective when there are strong investigative tools as well as constraints (limitations) on them. *De Facto Judiciary* and *Cornell Law* sources indicate that there is always a tension in interrogatories: discovering facts versus maintaining fairness. That is why courts have developed protective rules, objections, and limitations to promote justice and not harass any party. Today, when cases become more complex and costly, tools such as interrogatories help courts resolve disputes quickly and limit trials to the issues actually contested. Its role is not just procedural but also involves access to justice, fair hearing, and judicial efficiency. This reflects how much modern legal systems have evolved in case management and dispute resolution.

LEGAL FRAMEWORK AND PROCEDURE OF INTERROGATORIES

Indian legal framework of civil procedure maintains a balance in regulating interrogatories, where on one side it is important to bring out the truth, on the other side, it is also ensured that the procedure is not exploited. The main base is Order XI of CPC, 1908. This structure is the result of many years of judicial interpretation and legal expansion, covering every step of interrogatories from initiation to enforcement. Rules 1 to 11 of Order XI and Rules 21 and 22

create a complete circuit in which there is supervision of the courts, but the parties also have limited privilege. This ensures that the discovery process is flexible and without arbitrariness.

CPC specifically provides a procedure to start interrogatories. As per Rule 1, any party has to take leave of the court to send interrogatories. Getting the permission for interrogatories is not a right the court allows, only when it feels that it is necessary and relevant. The requirement has been kept so that no party asks useless questions or harasses the due process of law. The court grants permission only when the parties show that the reasonableness and questions are truly related to the dispute and are necessary for a fair decision of the case. According to Rule 2, the court has to decide within 7 days of the filing of the application. This time limit may seem short, but its purpose is to ensure that discovery is not delayed. According to experts such as De Facto Judiciary, this 7-day rule is a rare mandatory deadline in the discovery process, which means it is very important for the speed and efficiency of civil cases.

Under Rule 3, interrogatories must be in Form No. The purpose of this is not only to complete the formalities but also to bring uniformity, to make it easier for the court to review, and to make the other party understand clearly what has been asked of them. According to Rule 4, the party which gets interrogatories has to submit an affidavit along with an oath in Form No. 3, Appendix C, within 10 days. This affidavit can be used in the trial either to challenge someone's statement or to prove firm facts. In the P. Balan case, the Supreme Court held that an interrogatory response is formal evidence, not just an informal answer.

Rules 5 and 6 clarify that interrogatories should be limited to relevant issues only and should not be oppressive (too burdensome) for any party. In the Raj Narain vs Indira Gandhi case, it was made clear that interrogatories should be only for factual matters, not for legal opinions or assumptions. This line has been made clear that in the trial phase, there are legal arguments, and in the discovery phase, only facts are discovered. The Court has repeatedly stated that a fishing expedition, i.e. asking questions without a solid base, is not allowed. A fishing expedition means broad and vague questions that are asked only so that a claim can be found in the future. The Court has clarified that interrogatories should be based only on the pleaded issues, not on any speculative or imaginary point.

Rule 7 gives the court the power to strike if interrogatories are incorrect, irrelevant, or privileged. Rule 8 handles situations where answers are incomplete or misleading. These rules give the courts a proper system by which discovery disputes can be resolved. Courts have

clarified that relevance means the points already pleaded in interrogatories should not be conducted only for potential or future claims.

When the party is a company, it obviously cannot answer personally. In such cases, the interrogatories are answered by an authorised representative who has relevant knowledge or access. This process is a bit complex, so courts have to do careful management. The role of interrogatories is not just to collect facts; it also helps in trial preparation and case management. Disclosure of key facts at an early stage narrows the disputed issues and also motivates the parties to settle. Interrogatories and other discovery tools together create a strong pre-trial system, which reduces the court burden and makes the trial more focused and effective.

MODERN JUDICIAL PERSPECTIVES IN INDIA'S CIVIL PROCEDURE TOWARDS INTERROGATORIES

Judicial approach towards interrogatories in the present civil procedure has evolved significantly. Courts are now allowing interrogatories at liberty, but at the same time, strict procedural safeguards are also being applied. The focus of the courts is to maintain a balance where discovery is allowed, but the procedure is not exploited. Several landmark judgments have redefined the use of interrogatories in today's complex litigation.

The Madras High Court's decision, *Zee Media Corporation Ltd. v. Mahendra Singh Dhoni (2023)*, was a salient moment in the modern interpretation of interrogatories. A bench of Justice R. Mahadevan and Justice Mohammed Shaffiq rejected Zee Media's challenge to 17 interrogatories in Dhoni's defamation case. The Court was of the view that interrogatories shouldn't be limited to "technical boundaries" but rather should be used liberally so that the truth comes out and both parties get fair disclosure of their case. The court further clarified that interrogatories should be asked only if they are directly linked to the allegations in the written statement, and there should be proper material facts in the pleadings; just general matters will not work. In contrast to this, the Delhi High Court took a bit more restrictive approach to interrogatories in commercial disputes. In an October 2022 ruling, the Court clarified that the primary purpose of interrogatories is to narrow down the disputed facts and assist in the framing of issues. The court also said that plaintiffs cannot use interrogatories to shift their burden of proof. This approach is particularly important in commercial litigation, where parties attempt to misuse interrogatories as a substitute for full discovery.

Recently, in a patent litigation case, the necessity test has been made a crucial point of interrogatory practice. The Delhi High Court clarified in patent infringement cases that interrogatories should be permitted only when they help in collecting proof and in avoiding unnecessary excessive costs. The Court also said that if the replies to interrogatories are sufficient, then there is no need for cross-examination, which increases judicial efficiency.

Modern legal commentary highlights the point that for using interrogatories, lawyers must understand both things liberal attitude and the strict necessity requirement. In the *Tara Batra v. Poonam A. Kumar* case, the court said that the main purpose of interrogatories is to understand the case of the other party itself and shorten the trial. The Court adopted a liberal approach, but also acted as a gatekeeper so that the procedure was not misused. Defamation cases, especially high-profile ones, clearly show the practical use of interrogatories. The *Dhoni* case is an example where the Court rejected arguments of media defendants that interrogatories were part of improper cross-examination. The Court held that the plaintiff has a right to seek specific information when defensive pleadings are generalised. The Madras HC understood the role of interrogatories in the context of public interest and fair process.

In modern commercial and IP (intellectual property) cases, interrogatories become a little more complex, especially when it comes to trade secrets, privilege, and digital evidence. Courts have recognised that such objections must be properly analysed, and blanket privilege claims cannot deny valid discovery needs. Today's business disputes involving digital documents, cross-border deals, and IP rights are quite complex, so the courts' approach has become nuanced.

The procedure for challenging interrogatories has also evolved. Now, courts only strike questions when they are genuinely vexatious, repetitive, or irrelevant. But the court also ensures that challenging interrogatories is not simply a delayed tactic. Now parties have to clearly explain what specific prejudice they are facing; general inconvenience alone is not enough. Courts have repeatedly stated that interrogatories are not a substitute for evidence, but they play a major role in clarifying facts before trial. Well-drafted interrogatories can secure admissions, narrow the issues, and make trial preparation easier. In today's high-cost and congested litigation system, interrogatories have become a powerful tool for judicial efficiency. By today's standards, interrogatories must be relevant to the material issues of the case. They must not repeat information available from other discovery tools, and their scope must be reasonable without placing an unnecessary burden on a party. Courts are particularly sensitive to interrogatories used to harass the due process of law.

SCOPE, EXCEPTIONS, AND PROCEDURAL REALITIES OF TODAY, INTERROGATORIES IN INDIAN CIVIL PRACTICE

Today, the use of interrogatories in Indian civil procedure has evolved considerably, where courts have begun to clearly define the extent to which fact-finding is permissible and when it becomes a “fishing expedition” that harms procedural fairness. The recent decision of the Kerala High Court in O.P.(C) No. 2794 of 2019 made it clear that interrogatories cannot be used for any random or broad inquiry. The Court has made "test of prejudice" a standard to decide whether an interrogatory is appropriate or not. This approach is much refined than the earlier relaxed standards and shows that courts are now finding a balance between procedural abuse and genuine discovery. According to the 2024 analysis of SSRANA, interrogatories are a set of questions that both parties, with the permission of the court, can ask to elicit specific facts from each other. But behind this simple definition lie many complex legal and procedural considerations that have emerged from recent case laws.

The boundaries of permissible interrogatories have been made more precise by recent judgments, where courts consider the “necessity test” as the main basis for the correct use of interrogatories. The Delhi High Court has repeatedly reinforced, particularly in patent infringement cases, that interrogatories will be allowed only when they are necessary. This approach also matches the viewpoints of practitioners that discovery is a pre-trial procedure in which both parties have an equal opportunity to understand case-related facts. But in complex commercial disputes, parties sometimes misuse interrogatories to cover their weak pleadings or to avoid the burden of proof.

In today's judicial system, courts have developed tools that prevent misuse of discovery and preserve genuine discovery rights. The Kerala High Court has clarified that if there are new developments or materially changed circumstances, a second interrogatory application may not be denied. This provides litigants with some flexibility, but attention is also paid to not abusing the system. Courts have accepted that in commercial cases, facts evolve and rigid rules can hurt genuine party interests. The exceptions to the oral examination have also become quite narrow. The courts have said that oral examination will be allowed only in exceptional situations to clarify the answers of the interrogatory, that too when it is specifically stated in which part the clarification is required. This approach is because people go fishing in the name of clarification and unnecessarily stretch the discovery. Hence, the court is focusing a lot on specificity and precision.

In specialised litigation, such as commercial or technical cases, interrogatory practice becomes even trickier. Courts have made it clear that interrogatories should be used only to narrow the controversy, and not to shift the burden of proof to the plaintiff. The Delhi High Court has said that such questions which seek to take away the work of basic proof from interrogatories will not be allowed. This principle becomes even more important in IP disputes and commercial contract cases, because here parties repeatedly misuse interrogatories to try to obtain evidence that they should develop themselves.

The parameters of confidentiality and privilege have been further defined by the courts. Interrogatories resulting in a waiver are not supposed to result in a breach of privileged communication. But in the tangled web of real-life commercial disputes, especially when multiple companies or regulators may be parties, things get trickier when it comes to applying the privilege. Courts also have grown in this area and guard true privilege claims, but not under the guise of a privilege; do they also conceal the facts? When a party fails to respond to, or evades, written interrogatories, there are stronger enforcement mechanisms available to courts. The courts may also make adverse inference or, in serious cases, even strike out that party's defence. This suggests that the interrogatory process can only be effective if there are enforceable compliance mechanisms behind it. Sanctions are also proportional, first a warning, then an inference, and finally a pleading strike, so that fairness and deterrence are balanced. Overall, today's interrogatory system has evolved to handle the modern complexities of Indian civil litigation. Courts are now able to strike a better balance between discovery rights on the one hand and procedural efficiency on the other. This trend indicates that interrogatory doctrine is becoming more mature over time.

JUDICIAL DISCRETION, REFORM, AND FUTURE DIRECTIONS IN INTERROGATORIES

In the present scenario, the use of judicial discretion in the administration of interrogatory practice has become quite refined and updated, where sophisticated analytical frameworks have been developed beyond outdated traditional formalistic approaches, while maintaining procedural integrity. The seminal judgment of the Kerala High Court O.P (C) No. 2794 of 2019 (2025) was a turning point, where the court established that “if there is a subsequent cause of action or changed circumstances, there is no bar to a second interrogatory application”. The court also emphasised that “interrogatories, written questions that one party asks another party during a case, cannot be used for fishing inquiries” and “such questions should be for

strengthening a party's case" with a rigorous application of the "test of prejudice". This doctrinal development shows that courts have now understood the tension between the genuine need for discovery and procedural abuse, and that discretionary power should be used within clearly defined boundaries so that both the efficacy of fact-finding and the fundamental rights of litigants to fair and timely proceedings are protected.

The Delhi High Court's role in this regard has been particularly significant in the context of patent litigation disputes, such as the *Tara Batra v. Poonam A Kumar & Ors* [2025] and has placed the "necessity test" on a firm footing in the realm of interrogatory practice. The Court explained that "the purpose of interrogatories is to take the proof of that case and to prevent the expense and delay of bringing a witness to give evidence of the portion of a case." However, the Court also warned that "abuse of procedural complexities results in long delays in the disbursement of justice." This approach also demonstrates courts' understanding that "interrogatories are meant to be used to accomplish legitimate litigation purposes, and not as a strategic device." Therefore, each application is evaluated based on substantive criteria, is the information sought is essential to the resolution of the case, and whether it could be obtained in some other, less intrusive way. This test becomes even more important in IP litigation, where technical complexity and proprietary information are central to the issues.

Interrogatory procedure has been radically transformed by technology and procedural revision. Electronic Evidence and Video Conferencing Rules, 2025 of the Delhi High Court has formulated a holistic secure framework for conducting electronic proceedings such as recording of evidence, witnesses' examination, etc., and remotely through video conferencing and administration of interrogatories. These changes open exciting new doors for streamlined case management and also open new windows for authentication, security, and compliance challenges that the judiciary needs to systematically address. After the admission of interrogatory responses of electronic evidence, courts have developed sophisticated protocols such as technical certifications and chain-of-custody documentation to verify the authenticity so that the integrity of digital submissions is maintained.

Affidavit-driven response, too, is enforceable with hard hands, and courts are increasingly adopting a zero-tolerance policy for dishonest or non-cooperative litigants. "Interrogatories must be answered by affidavit that has to be filed within 10 days or time allowed or granted by the court", and failure to do so can result in a strong sanction such as "if the failing party is the plaintiff, its action can be dismissed", and "if any party does not obey an order to provide or

permit discovery, then the court may order other steps to be taken to insure that the order is obeyed, such as the imposition of the costs as sanctions, including reasonable attorney's fees" so that a party comply with an order of the court for proper purpose, without giving undue prejudice to a party. This enforcement model reflects that the success of an interrogation depends on timely, complete, and truthful responses, which requires courts to maintain active oversight to prevent delay tactics and create opportunities for genuine clarification or amendment.

Cross-border comparative analysis shows that interrogatory reforms are evolving in different ways within different jurisdictions. The Nebraska Rules 2025 and Queensland UCPR standards reflect international trends such as numerical limits and standardisation of electronic formats, while India's emphasis is on qualitative assessment through judicial discretion. This difference shows that procedural reforms depend on the litigation culture, judicial resources and systemic capacity of each jurisdiction, and any effective system design can only be achieved if all these elements are taken into account. The interaction between privilege, confidentiality and interrogatory practice has made the courts sophisticated doctrinally.

COMPARATIVE LAW, POLICY ADJURATIONS, AND CASE SUMMARY FOR INTERROGATORIES IN INDIAN CIVIL PRACTICE

Yet, this comparison also explains that there are underlying philosophical differences in questioning practices in pre-trial discovery that point the way to potential reforms for Indian civil procedure. The number (25) is the product of a legislative presumption that numerical limitations are necessary to achieve efficient administration, and of a judicial recognition that good cause must be shown for a larger number of interrogatories to any single party (for good cause shown), and for some lesser number where one party in particular shows sufficient good cause to serve more interrogatories on one or more other parties than are available to other parties. This approach is very different from the common law one, as witness questioning under historical English practice was in the form of a specialised one.

The Irish Superior Courts Rules 21 reform project also stand out in this regard, and are of some comparative interest as they require "an interrogatory to be accompanied by a brief statement of the reasons why the answer to such interrogatory is necessary for disposing fairly of the cause," while it approved an expanded access, by way of presumptive leave for a party to propound up to twenty interrogatories without leave in certain classes of proceedings. This

hybridisation also reflects sophisticated recognition that effective interrogatory practice demands more (as well as access) and finds the best of both worlds by overlaying swifter procedures for routine discovery with increased substantive scrutiny protecting against abuse while preserving procedural economy. The fact that the Irish approach still maintains the traditional limitations as to interrogatories in cases of fraud and breach of trust, where the “plaintiff may at any time after delivering his statement of claim deliver interrogatories in writing without leave” is evidence of a nuanced understanding that certain categories of disputes require enhanced discovery capabilities due to their inherent complexity and potential for information asymmetry.

The doctrinal insights of comparative analysis are that effective forms of questioning need to be fine-tuned to ensure appropriate modes of accessibility, judicial monitoring, and substance-based limitations consistent with the particular style of litigating and the system’s capacity. The development of the Indian jurisprudence, based on judicial discretion and substantive analysis, particularly in the form of the “test of prejudice” and “necessity test”, reflects a fundamentally different approach compared to numerical limitation systems, which tend to give primacy to quantitative rather than qualitative analysis. This contrast mirrors more general philosophical tensions between party freedom and judicial administration, which apply differently in different jurisdictions according to resource scarcity, the volume of litigation and the institutions’ capability for case management on an individual basis.

Policy suggestions for Indian policymakers should draw on comparative lessons and must be sensitive to domestic institutional limitations and procedural traditions which have developed over the years of judicial interpretation and administrative practice. Reasonable numerical presumptions may not be of aid (like 15 to 20 interrogatories per party expanded upon by the Court based on necessity), such that predictable and efficient standards can be evolved, paving the way for preserving the substantive standards evolved by the Indian Courts through a careful process of jurisprudential evolution. Related "electronic standardisation" projects, which involve the standardised formats of templates for interrogatory applications and responses, are expected under the reforms to contribute to reducing the administrative workload, whilst still incorporating information from applicant responses in a manner to assist review by the courts.

Efforts to harmonise cross-border and interjurisdictional discovery guidelines become, as commercial litigation becomes transnational with the advent of complex multinational corporate structures that will require coordinated discovery across a number of legal regimes,

a greater and greater priority for reform. Standard procedures for international discovery cooperation (built on existing frameworks for pretrial procedure in common law systems) would increase Indian courts' ability to handle complex commercial disputes and still maintain the requirements of international legal assistance treaties and bilateral judicial cooperation treaties that can facilitate and satisfy the effective conduct of the management of cross-border litigation.

Substantial procedural protection against abuse demands more effective summary condemnation procedures and early judicial filtering that does not permit interrogatory practice to become the vehicle for dilatory tactics or unwarranted fishing expeditions, but protects the authentic discovery rights necessary to equitable disposition of cases. Creation of differential case management regimes for either high-volume or high complexity disputes would allow the court to specialise in the management of interrogatory use and application of substantive standards for similar kinds of disputes. That kind of specialisation could include technological enhancements such as AI-enabled relevance screening or automated compliance-monitoring that lighten judges' loads but still preserve their processual integrity.

The doctrinal synthesis between Indian and international Case Mat: W.P.(C) 2432/2019 Page 7410 of 8857 jurisprudence reveals how the use of interrogatories has transformed from being instruments of wide-ranging discovery to detailed fact-generation suited to different types of litigation objectives under pre-defined, prescriptive boundaries. The "test of prejudice" adopted by the Kerala High Court and the "necessity test" evolved by the Delhi High Court both express analytical constructs that seek to reconcile the conflicting demands of relatively uncluttered procedure and yet ensure that the adjudicatory process is as productive as possible. It is evident that the Indian jurisprudential response has overcome the roadblocks towards legal reform realised in many other jurisdictions, and has responded, if one may submit, to the epistemic challenges in a very innovative style, inventing innovative problem-solving methods in the face of common problems evident across different legal systems. The move toward more discretion, technology integration, and knee-jerk evaluation standards is part of a problematic trend in civil procedure reform that prioritises proportionality, efficiency, and fairness over formalistic compliance with rigid procedural requirements.

Practitioners of the future will need to adjust to increasingly enlightened judicial expectations for interrogatory applications with written justifications of need, evidentiary linkage to contested matters, and consideration of alternative discovery strategies that might be employed

to achieve the same end without unduly burdening the opposition. Judicial training needs to develop for better case-management tools and strategies that balance the need to dispose of cases efficiently against the need to decide them properly, something that is especially true at the specialized, technical levels, such as intellectual property, commercial and international trade cases, where the risk increases of harvesting natural wild seaweed that sway in the sea to satisfy real discovery needs on the one hand and harvesting wild seaweed to serve as justifiable pre-discovery game-playing on the other. Policymakers should consider reforms that combine technology-enabled enhancements with longstanding procedural protections to build systems that provide enhanced processual efficiency.

The anticipated direction of Indian judicial reforms implied ongoing movement from increased judicial control and technology-infusion towards more refined analytical approaches to interrogatory applications, evaluated in a wider context of case management, rather than as mere independently disposed procedural motions. This sort of development probably will result in more efficient, fair and effective practice of interrogatories that serve legitimate litigation ends if it does not invite abuse, which in its turn will cumulatively improve the administration of civil justice for all litigant groups.