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| NORTH CAROLINA\_\_\_\_\_\_\_\_ COUNTY  \_\_\_\_\_\_\_\_\_\_,                        PLAINTIFF,                        V. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,                        DEFENDANT. |     )))))))))  | IN THE GENERAL COURT OF JUSTICEDISTRICT COURT DIVISION\_\_\_\_\_\_\_-CVD-\_\_\_\_\_\_\_     **PLAINTIFF’S FIRST SET OF INTERROGATORIES** |

TO: [NAME]

[ADDRESS]

Defendant requests that Plaintiff answer within 30 (thirty) days, under oath, in accordance with the Rules of Civil Procedure, the following interrogatories.

INSTRUCTIONS

            1. Time of Response. These interrogatories are to be answered pursuant to Rule 168 of the Texas Rules of Civil Procedure within thirty-one (31) days of the date of service. Each interrogatory shall be answered separately and fully in writing under oath, unless it is objected to, in which event the specific reasons for objection shall be stated in lieu of an answer.

            2. Information Required in Response. The response to each interrogatory shall include such information as the answering pray has and/or is within the party's actual and/or constructive possession, custody, or control, including, but not limited to, information and documents in the possession, custody, or control of investigators, employees, accountants, consultants, attorneys or other agents.

                        3. Basis for Response. Where facts set forth in answers or portion thereof are supplied upon information and belief, rather than upon actual knowledge, the answer should so state, and specifically describe or identify the source or sources of such information and belief. If the answering party cannot answer an interrogatory in full, after exercising due diligence to secure the information requested, so state and answer to the fullest extent possible, specifying the inability to answer the remainder and stating whatever information or knowledge the answering party has concerning the unanswered portion.

                        4. Supplementation. These interrogatories are intended as continuing interrogatories, requiring the answering party to answer by supplemental answer, setting forth any information within the scope of the interrogatories as may be acquired by the party , agents or representatives following the filling of the original answers. Rule 168 of the Texas Rules of Civil Procedure requires the supplementation of answers if the answering party later obtains information which:

            a. Leads the party to know that its answer to one or more of the interrogatories was incorrect when made; or

             b. Leads the party to know that its answer to one or more of the interrogatories is no longer true and the circumstances are such that a failure to amend the answer is in substance a knowing concealment.

            5. If the answer to any interrogatory may be derived or ascertained form business records, and the burden of deriving the answer would be substantially the same for each party , the answering party may specify the records from which the answer may be obtained. that specification, however, must be in significant detail to allow the location and identification of the business records as easily as the answering party can, and must include reasonable opportunity to examine, audit, or inspect such records, and made copies, compilations, abstracts, or summaries.

            6. Claims of Privilege. If the answering party claims that the answer to any

interrogatory is privileged, in whole or in part, or otherwise objects to any part of any

interrogatory , or that an identified document would be excludable from production regardless of the relevance, state the reasons for such objection or grounds for exclusion, and identify each person having knowledge of the factual basis, if any, on which the privilege or other ground is asserted.

            7 . Signature and Notarization. Upon completion of the answers to interrogatories, the signature of the party to whom the interrogatories are addressed should be affixed in the prescribed location, the notarization should be completed and the Certificate of Service should be completed with the date upon which a copy of the answers is forwarded to the other counsel in the suit.

DEFINITIONS

            1. The term " document" or" documents " as used herein shall mean any medium upon which information is or can be recorded, including without limitation papers, books, letters, notes, diaries, calendars, appointment schedules, correspondence, telegrams, cables, telex messages, memoranda, notebooks, minutes, ledgers, worksheets, journals, reports, statements, summaries, photographs, maps, computer printouts, video tapes, inventory lists, transcripts of testimony, mechanical means of voice production of any notes, summaries or excerpts prepared from any of the foregoing; and where copies of the same documents are dissimilar in any respect, both of said documents.

            2. The term "evidence" when used as a verb shall mean proving, indicating, or being probative of the existence or nature of the thing mentioned.

            3. "Identify" with respect to a person shall mean to state the name of the person, the person's employer, job classification, business telephone number, business address, home telephone number and home address.

            4. "Identify" or "describe' with respect to documents shall mean to attach a copy of the document to the answers or to state each of the following as reflected on the document or as is known to the answering party , the party , agents or representatives :a. The nature of the document; b. The date of the document; c. The author of the document; d. The addressee and all recipients of the document; e. The title of the document; f . The identity of the person(s) who prepared the document; g. The location of the document and the identity of the custodian; and h. The time and place at which the party posing the interrogatories may inspect and/or obtain copies of the documents.

            5.  All references to documents shall refer to those that are: a.  In the actual possession of the answering party ;b.  In the custody or possession of the answering party , though located elsewhere; c. In the care, custody and control of the answering party , although in the possession of its attorneys, accountants, agents, or employees; and. All other documents, wherever located, as to which the answering has the right of possession.

            6. If the answering party relies upon any type of privilege or discovery exemption, then as to each answer for which such a privilege or exemption is claimed, state the following: a. The exact privilege of exemption relied upon and the basis for asserting it; b. The facts upon which the privilege or exemption is based.

            7. "Identify" or "describe" with respect to a communication shall mean to set

forth: a. The date of the communication; b. The mode of communication, written, oral or otherwise; c. The person(s) initiating the communication; d. The person(s) receiving the communication; e. The substance of the communication; and f. Any documents constituting or recording the communication.

            8. The term "or" as used herein shall be inclusive.

            9. The term "person" shall mean and include actual persons, governmental entities and agencies, proprietorships, partnerships, corporations, and all other forms or organization or association.

            10. All reference to a person, whether by name or by description, include that person's agents, attorneys, accountants, and employees.

            11. The term "fact" shall refer to all evidentiary facts presently known to you and all evidentiary facts presently known to you and all evidentiary facts, the existence of which is presently inferred by you from the existence of any combination of evidentiary and/ or ultimate facts.

            12. The term "health professional" shall mean and refer to any person (a) authorized to practice medicine in any state of nation; or (b ) licensed or certified by the State in which he or she practices to undertake the diagnosis, evaluation or treatment or any mental or emotional disorder; or (c) involved in the treatment or examination of drug abusers; or (d) reasonably believed by the patient to be include in any of the preceding categories.

            13. The term "relevant" means having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable. (Rule 401 TRCE).

            14. The term "failure" means a failure to answer an interrogatory in good faith and completely may result in the imposition of sanctions upon the answering party pursuant to Rule 215 of the Texas Rules of Civil Procedure.

            15.  The term "you" refers to SP1.

            16   The term "your spouse" refers to SP2.

            17. The references to any partnership, corporation, trust other entity include the production of all documents related to any entity and the following information related to said entity: (a) name of the entity, (b) office address, (3) office telephone number, (d) address of any principals, owners, partners, or other parties holding any interest in the entity , (e) telephone number of any principals, owners, partners, or other parties holding any interest in the entity , (t) form of the entity , (g) identity of any representatives of the entity .

            18. The term "household" means a unit composed of all persons living together in the same dwelling in which you reside, whether or not they are related to you or not they are related to you or to each other .

            19. The term "child" refers to each child who is the subject of this suit, whether there is one or more children.

            20. Unless otherwise specified, the time frame applicable to each interrogatory shall be the past four years.

            21. Place the answer to each interrogatory in the space provided is insufficient, complete the answer on a sheet of paper to be attached to your answers and labeled with the number of the interrogatory to which the answer is related.

INTERROGATORIES

            1.         State your name, present address (name of all persons presently residing with you), social security number and Texas drivers license number.

            **RESPONSE:**

            2.         State your educational background, including the names of schools attended, dates of attendance, and degrees achieved, if any.

            **RESPONSE:**

3.         State your employment history for the last 3 years, including names of employers, nature of employment, dates of employment, and amount of average monthly gross pay received from each of the employers.

            **RESPONSE:**

4.         Please identify, by stating the name, address and telephone number, all persons known to you to have knowledge of facts relevant to the subject matter of this suit. "Relevant facts" are any facts related to any aspect of this litigation or the relief requested by any party or their respective defenses thereto. As used in these interrogatories, the term is further expanded by the definition of relevance under the Texas Rules of Evidence, provided, however, the information need not be admissible in order to satisfy the requirements of the subsection and personal knowledge is not required. A person shall be considered to have knowledge of relevant facts when he or she may have knowledge of any discoverable matter.

            **RESPONSE:**

            5.         Please state: (a) the "relevant facts" (as defmed above) known to each person identified in Interrogatory Number 4; and (b) how each person identified in Interrogatory Number 4 acquired their knowledge of "relevant facts. "

            **RESPONSE:**

            6.         Please state: (a) the name, address and telephone number of all expert witnesses, including without limitation, appraisers, accountants, actuaries, health-care providers, and mental health-care providers, save and except such experts subject to exemption under Rule 166(b)(3), who may be called, either live or by deposition, as a witness in this case; (b) the subject matter on which each expert is expected to testify; (c) the matter on which each expert is expected to testify; (d) the opinions held by the expert and the facts known to the expert (regardless of when the factual information was acquired) which relate to or form the basis of the opinions held by the expert.

            **RESPONSE:**

            7.         If you have used any expert for consultation who is not expected to be called as a witness, and such expert's opinion or impressions have been reviewed in whole or in part by an expert who may be called as a witness, please state (a) the name, address and telephone number of such expert; and (b ) the opinion or impressions of any expert who may testify that were reviewed by the consulting expert.

            **RESPONSE:**

            8.         Have you received any written reports from any of the persons named in response to Interrogatory Number 6 or Number 7? If so, describe the nature of the report, the date of the report, the name and address of the person who prepared the report, and the current locations of all copies of the report.

            **RESPONSE:**

            9.         If you or the children, the subject of this suit, have been examined by, and/or received counseling with, a physician, psychologist, psychiatrist, counselor, or other healthcare professional since \_\_\_\_\_\_\_\_\_\_ , please state: (1) the name, address and telephone of each health-care professional; (b) the purpose of such examination and/or counseling; and (c) the findings, conclusions, diagnoses of which you are aware that were made by such health-care professional.

            **RESPONSE:**

            10.       Have any photographs, portraits, tape recordings and/or videotape recording been made in connection with this litigation. If so, then for each such photograph, portrait, tape recording and/or videotape recording, please state: (a) the subject matter of each, (b) identify the persons whose image is contained on such photograph or portrait and/ or whose voice is contained on such tape recording or videotape, and (c) the location of each copy thereof.

            **RESPONSE:**

11.       Please identify all persons of the opposite sex, other than family-related members, you have been out with socially when SP2 was not present, either singly or with others from January \_\_\_\_\_\_\_\_, to the present.

            **RESPONSE:**

12.       Other than SP2, please identify all persons with whom you have had sexual intercourse or any form of sexual contact during your marriage to SP2 .

            **RESPONSE:**

13.       Please list all prescription drugs taken by you since January 1, -, through the present date, including: (a) name of the prescription drug; (b) medical reason for taking the drug;( c ) the date the drug was purchased; ( d) the name, address and telephone number of the pharmacy where each such drug was purchased; and (e) the name, address and telephone number of the physician or individual who prescribed such drug.

            **RESPONSE:**

            14.       Please itemize (by dates, amounts, services rendered or costs incurred, charges therefore, and any and all sums paid thereon) by you, or on your behalf, to any expert in connection with this cause of action, for services rendered and/ or for consultation in connection with his litigation from through the present.

            **RESPONSE:**

15.       Please itemize (by dates, amounts, services rendered or costs incurred, charges therefore, and any and all sums paid thereon) by you, or on your behalf, to any mental-health expert, mental-health counselor, psychologist or psychiatrist in connection with his litigation.

            **RESPONSE:**

            16.       Please state the name, address, employer and telephone number of any person whom you have employed as a private investigator in connection with this litigation. State the subject matter of the investigation and the facts known to the investigator that relate to or form the basis of any report that may have been provided by the investigator. State whether any written report has been compiled by the investigator, and, if so, the location of each copy thereof .

            **RESPONSE:**

            17.       Do you have any tape recording of any conversations between you and your spouse or your spouse and any other person? If so, describe each such tape recording, its present location, and it contents.

            **RESPONSE:**

18.       Do you have any letters or other written communications between you and your spouse or between your spouse and any other person. If so, describe each such letter or other written communication, its present location, and its contents.

            **RESPONSE:**

19.       Do you have any diaries, calendars, or other documents recording transactions between you and your spouse or between your spouse and any other person or recording activity of you or your spouse? If so, describe each such documents, its present location, and its contents.

            **RESPONSE:**

20.       Do you have any documents or other tangible things, including videotapes, recordings, motion pictures, photographs, portraits, or other reproductions made within the past 3 years, containing the voice or image of you, your souse, or of your children? If so, describe each such document or other tangible thing, its presentation, and its contents.

            **RESPONSE:**

            21.       Please state specifically and in full detail (on the attached financial information sheet) each and every monthly living expense of yours and all of your monthly income for each of the past months.

            **RESPONSE:**

22.       Please identify all persons who have knowledge of acts relevant to the allegations that

.

            23.       Please state whether you claim that SP2 has psychologically or physically mistreated you in any fashion, including specification as to how, when and under what circumstances any such mistreatment occurred.

            **RESPONSE:**

            24.       Please identify any medical, physical, psychological, emotional, educational or other limitations or difficulties that adversely affect you or limit your ability to support yourself and/or the children. With respect to any answer, please state: (a) the nature of the difficulty, (b ) the cause of the difficulty , ( c ) the extent of impairment created by such difficulty , and ( d) the cost associated with treatment of the condition.

            **RESPONSE:**

            25.       Describe the contractual relationship with your attorney in this suit, including a description of: a) retainer fee paid, b) expense deposits, paid, c) attorneys fees, other than retainer fees, paid, d) expenses, other than expense deposits, paid, e) hourly rate for services rendered by the attorney and staff, t) sums owed to the attorney, g) serviced performed, h) sums to be owed for future services, i) terms under which payments are to be made, j) source of funds utilized for payments made to date, k) source of funds to be utilized for payments made to date, k) source of funds to be utilized for payments to be made in the future, and I) any other matters necessary to describe the relationship in detail if a written employment agreement has been executed and contained any portion of the information requested in this interrogatory , attachment of the agreement will be sufficient to answer those portions of the interrogatory .

            **RESPONSE:**

            26.       If you contend that SP2 is at fault in the breakup of the marriage relationship, describe in detail the following: a) all conduct on the part of said party that you content supports your allegation, b) all documents that contain any references you contend support your allegations, c) the persons with knowledge of facts (relevant to the issue, and d) any other evidence you contend supports your allegations.

            **RESPONSE:**

            27.       If you contend that SP2 has participated in any conduct that constitutes a statutory basis for the granting of a divorce pursuant to the terms of the Texas Family Code, describe in detail the following: a) all conduct on the part of said party that you contend supports your allegation, b) all documents that contain any references you content support your allegations, c) the persons with knowledge of facts relevant to the issue, and d) any other evidence you contend supports your allegations.

            **RESPONSE:**

            28        If you contend that SP2 has participated in any conduct that constitutes a tort resulting in injury to you or your property interests, describe in detail the following: a) all conduct on the part of said party that you content supports your allegation, b) all documents that contain any references you content support your allegations, c) the persons with knowledge of facts relevant to the issue, and d) any other evidence you contend supports your allegations.

            **RESPONSE:**

            29.       If you contend that SP2 has participated in any conduct that constitutes a tort resulting in injury to you or your property interests, describe in detail the following: a) all injuries you content were the result of such conduct, b) all damages you content were the result of such conduct, c) the method by which the damages alleged were calculated, d) the identity of all persons with knowledge of facts relevant to the issue, and d) any other evidence you contend supports your allegations.

            **RESPONSE:**

            30.       If you admit that you have fault in the breakup of the marriage relationship, describe in detail the following: a) all conduct on your part that supports that position, b) all documents that contain any references that support the position, c) the persons with knowledge of facts relevant to the issue, and d) any other evidence that supports the position.

            **RESPONSE:**

            31.       If you admit that you participated in any conduct that constitutes a statutory basis for the granting of a divorce pursuant to the terms of the Texas Family Code, describe in detail the following: a) all conduct on your part that supports that position, b) all documents that contain any references that support that position, c) the persons with knowledge of fact a relevant to the issue, and d) any other evidence that supports that position.

            **RESPONSE:**

            32.       If you admit that you have participated in any conduct that constitutes a tort resulting in injury to SP2 or said party's property interests, describe in detail the following: a) all conduct on your part that supports that position, b) all documents that contain any references that support that position, b) all documents that contain any references that support that position, c) the persons with knowledge of facts relevant to the issue, and d) any other evidence that supports the position.

            **RESPONSE:**

33.       If you admit that you have participated in any conduct that constitutes a tort resulting in injury to SP2 or said party's property interests, describe in detail the following: a) all injuries you admit were the result of such conduct, b) all damages that were the result of such conduct c) the method by which the damages alleged were calculated, d) the identity of all persons with knowledge of facts relevant to the issue, and d) any other evidence that supports that position.

            **RESPONSE:**

34.       Do you agree that it is in the best interest of each child, the subject of this suit, that SP2 be appointed joint managing conservator?

            **RESPONSE:**

35.       If your answer to the foregoing interrogatory is negative, state with particularity each fact that is known to you or reported to you by other persons or sources to you by other persons or sources of any nature (identify in your answer those reporting persons) that you content supports your denial of the foregoing interrogatory .

            **RESPONSE:**

36.       If you agree that SP2 should be appointed as joint managing conservator of each child, the subject of this suit, what powers, duties, responsibilities and privileges do you content said party should possess as a joint managing conservator.

            **RESPONSE:**

37.       If you agree that you should be appointed as joint managing conservator of each child, the subject of this suit, what powers, duties, responsibilities and privileges do you contend you should possess as a joint managing conservator.

            **RESPONSE:**

            38.       Do you agree that it is in the best interest of each child, the subject of this suit, that SP2 be appointed sole managing conservator?

            **RESPONSE:**

            39.       If your answer to the foregoing interrogatory is negative, state with particularity each fact that is known to you or reported to you by other persons or sources of any nature (identify in your answer those reporting persons) that you contend support your denial of the foregoing interrogatory.

            **RESPONSE:**

            40.       Do you contend that it is in the best interest of each child, the subject of this suit, that you be appointed sole managing conservator?

            **RESPONSE:**

            41.       If your answer to the foregoing Interrogatory is affirmative, state with particularity each fact that is known to you or reported to you by others (identify in your answer the other persons) that you contend supports your answer to the foregoing Interrogatory.

            **RESPONSE:**

            42.       Have the children made statements to you that reveal their attitudes toward your spouse? If so, give the contents of each such statement; the circumstances under which it was made, the identifies of all persons present when the statement was made, and the approximate date it was made.

            **RESPONSE:**

43.       Have the children made statements to you that reveal their attitudes concerning SP2 having primary possession of each child? If so, give the contents of each such statement; the circumstances under which it was made, the identities of all persons present when the statement was made, and the approximate date it was made.

            **RESPONSE:**

            44        If you are appointed as sole managing conservator of each child, the subject of the suit, state what arrangements do you intend to make for the care of each child during your working hours or other times during which you would be unable to have possession of each child.

            **RESPONSE:**

45.       Identify each person having knowledge of facts relevant to the issue of conservatorship of each child, the subject of this suit, or who may possess any information relevant to the issue of conservatorship.

            **RESPONSE:**

            46.       With respect to each person identified in response to the prior Interrogatory , state whether there are any documents or tangible items to which said persons have access or of which said persons have possession that are relevant to the issue of conservatorship. If so, describe such documents or tangible items, the location of such items, and the relevance of the items.

            **RESPONSE:**

            47.       If you maintain that you should be the conservator having primary possession of each child, the subject of this suit, what times and terms of possession should be applicable to possession of each child by SP2.

            **RESPONSE:**

            48.       Please state whether you attend religious services. If so, state the religious services you attend, how frequently you attend, whether you are a member of the church that conducts the services, and whether you take each child with you to such services.

            **RESPONSE:**

            49.       If SP2 is awarded primary possession of each child, the subject of this suit, what sum of child support do you claim would be reasonable and fair for you to pay to SP2 for the support of each child. Please describe in detail with respect to child support payments: (a) amount, (b) frequency, (c) method, (d) form, and (e) any other terms related to the payment of support for the benefit of each child that you deem would be appropriate .

            **RESPONSE:**

            50.       If you are awarded primary possession of each child, the subject of this suit, what sum of child support do you claim would be reasonable and fair for SP2 to pay for the support of each child. Please describe in detail with respect to child support payments: (a) amount, (b) frequency, (c) method, (d) form, and (e) any other terms related to the payment of support for the benefit of each child that you deem would be appropriate.

            **RESPONSE:**

            51.       Please state whether you are willing to maintain, at your sole expense, medical and health care insurance for the benefit of each child, the subject of this suit. Please state the reason for your answer.

            **RESPONSE:**

            52.       What part of the medical, dental and other health care expenses incurred for the benefit of each child and are not paid by any applicable insurance are you willing to pay after the divorce.

            **RESPONSE:**

            53.       Identify any persons not related to you by blood or marriage who have spent the night in any location you have occupied during the past 2 years.

            **RESPONSE:**

            54.       If you contend that SP2 should be appointed as possessory conservator of each child and should not be granted possession of each child in accordance with the standard visitation schedule set forth in the Texas Family Code, then state: (a) all facts you content indicate that the standard visitation schedule is not appropriate for SP2, (b) the visitation schedule that you contend should be applicable to SP2 and said party's possession of each child, and (c) the reason that you contend the standard visitation schedule should not be utilized with respect to SP2.

            **RESPONSE:**

55.       State what hours and days of the week you normally work.

            **RESPONSE:**

56.       With respect to each child, please state: (a) the name and location of the school which the child attends, (b) the name, address and telephone numbers of each teacher and counselor for each child, (c) when within the last 3 years you have had contact with any of said persons, and (d) the circumstances under which you have had contact with any of said persons.

            **RESPONSE:**

57.       With respect to each child, please state whether you claim that SP2 has psychologically or physically abused the child, including specification as to how, when and under what circumstances such abuse occurred.

            **RESPONSE:**

            58.       With respect to each child, please identify any medical, psychological, emotional, educational or other limitations or difficulties that adversely affect the child or require the expenditure of funds. With respect to any answer, please state: (a) the nature of the difficulty , (b ) the cause of the difficulty , ( c ) the extent or impairment to the child created by such difficulty , and ( d) the cost associated with treatment of the condition.

            **RESPONSE:**

59.       Identify each person you or any person on your behalf has interviewed regarding this suit.

            **RESPONSE:**

60.       Identify each person from whom you or any person acting on your behalf has obtained a "written statement, " as that term is used in the Texas Rules of Civil Procedure.

            **RESPONSE:**

61.       Please state each material change of circumstances that you contend has occurred with respect to each child, and/or each conservator since the entry of the last order in this suit affecting the conservatorship or possession of the child.

            **RESPONSE:**

62.       Please state each reason that you contend retaining the person named as managing conservator of each child would be injurious to the welfare of said child.

            **RESPONSE:**

63        Please state each reason that it would be a positive improvement with respect to the welfare of each child with you as the managing conservator of said child.

            **RESPONSE:**

            64.       If you are presently employed, state your workdays and hours and whether you are required to put in overtime.

            **RESPONSE:**

            65.       State in detail what you consider to be the best custodial arrangements for your children and why.

            **RESPONSE:**

            66.       Have the children expressed a preference to live with you? If so, state:

                                    a.         Each date such preferences were expressed.

                                    b.         The circumstances giving rise to each expression.

                                    c.         The words used by each child in expressing such preference.

            **RESPONSE:**

            67.       State the address at which you and the children would reside if you were granted sole or joint physical custody and describe with specificity the children I s proposed living quarters.

            **RESPONSE:**

            68.       Would you be able to devote yourself full-time to the children's care and upbringing if you were granted custody? If not, state:

                        a.         The proportion of each day you intend to spend with the children.

                        b.         How you intend to provide for the children's care when you are

unavailable (name each person and/or institution that will be hired for this purpose).

                        c.         Why you are unable to devote yourself full-time to the children's care.

            **RESPONSE:**

            69.       If you are not granted sole physical custody, state with specificity the visitation time that would be appropriate.

            **RESPONSE:**

            70.       If you are granted sole physical custody, state with specificity the visitation time that would be appropriate.

            **RESPONSE:**

            71.       State whether you and your spouse have any major disagreements concerning the children's education, religious upbringing, discipline, health care needs, and/or extracurricular activities, and, if so, detail the nature of each disagreement and each

partyâ€™s position as you perceive it.

            **RESPONSE:**

            72.       List the name, address, telephone number, and dates of contact for each mental health professional or social worker who has been involved with the children or either parent.[Editor's note: For questions 9 or 10, a time period might be specified, such as the last five years.]

            **RESPONSE:**

            73.       List the name, address, telephone number, and dates of contact for each physician to whom you have personally taken the children for evaluation or treatment.

            List the name, address, and telephone number of each person who has knowledge or

relevant facts concerning the issues of custody and visitation in this case, and for each,

state the nature of the knowledge.

            **RESPONSE:**

            74.       List the dates since your separation from your spouse when the children have physically resided with you, and for each period of time, state whether any other person or

institution has cared for the children and, if so, provide their names, addresses, and

telephone numbers, the circumstances warranting this care, and the dates and times

during which this care was provided.

**RESPONSE:**

            75.       Is there anything about your spouse that renders him [her] unfit to have sole physical custody of the children? If so, describe with specificity this unfitness.

            **RESPONSE:**

            76.       Describe your current state of health and provide the name, address, and telephone number of each physician, medical clinic, or nurse practitioner you have consulted during the past 18 months. State the date of each consultation, its purpose, the

diagnosis, and the treatment.

            **RESPONSE:**

            77.       List any current medications you are taking, the dates from which you have taken them, and their purposes.

            **RESPONSE:**

            78.       Describe your plans for the children's educational development and how you intend to implement these plans.

            **RESPONSE:**

            79.       Describe your plans for the children's religious education and development and how you intend to implement these plans.

            **RESPONSE:**

            80.       Describe your plans for the children's extracurricular activities and how you intend to implement these plans.

            **RESPONSE:**

            81.       Describe with specificity why you would be a better custodian than your spouse.

            **RESPONSE:**

            82.       State with specificity your greatest strengths and weaknesses as a parent.

            **RESPONSE:**

            83.       State with specificity your spouse's greatest strengths and weaknesses as a parent.

            **RESPONSE:**

            84.       Describe how you discipline your children.

            **RESPONSE:**

            85        State any difficulties your children are having and how you are equipped to deal with these difficulties.

            **RESPONSE:**

            86.       Do you have plans for remarriage? If so, describe with specificity the relationship between the children and the future stepparent.

            **RESPONSE:**

            87.       Do you have plans to relocate? If so, describe your relocation plans.

            **RESPONSE:**

            88.       Do you object to your children being removed from the immediate geographical area? If so, state your objections.

            **RESPONSE:**

                        This the \_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attorneys for Defendant

Attorney Address

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been duly served on all parties of record by my depositing a copy of same in the United States mail, first class, postage prepaid, addressed as follows:

[NAME]

[ADDRESS]

This the \_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attorneys for Defendant

Attorney Address