

INTERROGATORIES

1. Please state your full name, date of your birth, the address of your present place of resident, and your Social Security Number

ANSWER:

2. State the name and relationship to you of each person residing with you at your present address.

ANSWER:

3. State the address of all previous residences where you have resided for the last year, and the dates you resided at each such address, and the name and relationship to you of each person residing with you at each of your previous addresses.

ANSWER:

4. State the name of each person, firm or corporation by whom you were employed during the preceding twelve (12) months and the total gross income received from each employer during the preceding twelve (12) months.

ANSWER:

5. If you were self-employed or a member of a partnership during any of the three (3) preceding years, state the nature of the business and your share of the gross income (after business expenses) received in each said year.

ANSWER:

6. State the name and address of every person, firm or corporation by whom you were employed for the last three (3) years, the total gross income per year received from each employer.

ANSWER:

7. If you were self-employed or a member of a partnership during any of the three (3) preceding years, state the nature of the business and your share of the gross income (after business expense) received in each said year.

ANSWER:

8. State whether you are, or during the past five (5) years you were engaged in any business enterprise as a director, officer or shareholder of a closely held corporation. If so, please state the following:

- a. Identify (name and address) the business.
- b. Identify (name and address) each director and officer.
- c. The date on which you acquired your interest, or your participation

- commenced.
- d. Your capital contribution(s) to the business and the date(s) on which said contribution(s) were made.
 - e. The date on which your interest, participation or relationship terminated.
 - f. The number of shares of stock you own, type of stock and the number of shares outstanding.
 - g. Your proportionate share in the ownership and/or profits of the business.
 - h. Identify (name and address) the custodian of the financial records of the business and the business ventures accountants.

ANSWER:

9. State whether you are, or during the past five (5) years you were, a participant in other business relationships or ventures; if so please state the following:
- a. Identify (name and address) the business.
 - b. Identify (name and address) each participant in the business.
 - c. The date on which your relationship or your participation commenced.
 - d. Your capital contribution(s) to the business and the date(s) on which said contribution(s) were made.
 - e. The date on which your interest, participation or relationship terminated.
 - f. Your proportionate share in the ownership, and/or profits of the business.
 - g. Identify (name and address) the custodian of the financial records of the business and the business' accountant.

ANSWER:

10. If you receive any economic (fringe) benefits from your present employment other than wages (i.e. company car, health or life insurance, expense accounts, club membership, etc.), describe each benefit you receive and the amount you receive from said benefit or the value of said benefit.

ANSWER:

11. If you have any interest in any pension, profit sharing, retirement, KEOUGH Plan, I.R.A. account, thrift plan, or any other form of employment-related asset with any past or present employer, state:

- a. The date first acquired.
- b. The type of assets (e.g., pension plan).
- c. The present vested or cash value to your of such asset.
- d. The name of the company that administers the plan or program and the name, address and phone number of the person who administers the plan;
- e. Attach a copy of the plan;
- f. Attach a copy of the latest report you have received from your employer on the administration of the plan indicating your interest in said plan.

ANSWER:

12. If you are not presently employed full-time and have attempted to obtain full-time employment in the past six (6) months, state the names of all employers with whom you have consulted and the dates of all interviews or employment applications.

ANSWER:

13. If you are not presently employed full-time and have not attempted to obtain full-time employment in the last six (6) months, state the reason for not looking for full-time employment.

ANSWER:

14. State whether or not there is any reason why you cannot find appropriate employment at the present time, and, if so, please state the reason.

ANSWER:

15. State whether or not you have had sufficient education or training to enable you to find appropriate employment and, if not, state the time necessary for you to acquire such sufficient education or training to enable you to find appropriate employment.

ANSWER:

16. If you or a member of your household receive any pension, dividend, interest, note, insurance, annuity payment, or social security payments on a regular basis, state the type of payment, amount, and the date you normally receive such payment.

ANSWER:

17. Attach copies of your federal income tax returns to your answers to these interrogatories for the past five (5) calendar years, including your 1997 tax returns and

complete copies of all 2002 pay stubs or one company provided statement showing pay for year to date.

ANSWER:

18. If you have given any financial statements during the last three (3) years, state the name and address of each person or organization to whom you gave such financial statements, and attach a copy of said statement(s) to your answers to these Interrogatories.

ANSWER:

19. State whether you received any other income, including rental income, interest income, other than what has been previously stated from your present employment, and if so, please state the type of income, the total amount of each such income received in 2002 to the date of your answers to these Interrogatories.

ANSWER:

20. If you have any claim or cause of action against anyone else, set out in detail the reason for such claim or cause of action and sufficient information to identify any court proceeding pending regarding said claim.

ANSWER:

21. If you have transferred any real or personal property since within the last twenty-four (24) months, for each such item state:

- a. The legal description of the property.
- b. The value of your equity interest in the property.
- c. The date you transferred the property.

- d. The name and address of the person to whom you transferred said property.
- e. The net proceeds received for said property.

ANSWER:

22. If you have not already done so, attach to your answers to these interrogatories a completed copy of the court-approved Statement of Marital and Non-Marital Property and Liabilities and an Income and Expense Statement. Said Statements should be completely and accurately filled out.

ANSWER:

23. Do you claim an ownership interest, legal or equitable, in any real estate? If so, please state the following with respect to each parcel of real estate.

- a. The street address.
- b. The legal description.
- c. Describe your ownership interest.
- d. Identify (name and address) the person(s) in whose name(s) recorded legal title is held.
- e. Describe how you acquired your interest in the real estate and the date you acquired your interest.
- f. The purchase price.
- g. The present fair market value.
- h. Identify (name and address) the holders of all mortgages, liens, encumbrances and state the present balance of each.
- i. Attach a copy of the real estate deed transferring said property to you.

ANSWER:

24. If during the past three (3) years, you have had any savings, checking, or commercial accounts in your name, solely or jointly with others, with a bank or financial institution, please state:

- a. The name and address of the bank or financial institution.
- b. The type of account.
- c. The names on the account.
- d. The person(s) authorized to draw on the account.

- e. The date the account was opened.
- f. The date the account was closed.
- g. The account number
- h. The amount of the present balance, if any, or the amount of the last balance before the account was closed

ANSWER:

25. If during the past three (3) years, there have been any bank accounts on which your name did not appear, in which you deposited or drew money, or are authorized to withdraw money, please state with respect to each such account:
- a. The name and address of the bank or financial institution.
 - b. Each name under which the account is listed.
 - c. The account number.
 - d. The approximate date or dates and amounts of each deposit or withdrawal made by you.

ANSWER:

26. If there are, or were during the last three (3) year period, any safe-deposit boxes, vaults, safes, or other places of deposits and safe-keeping in which you deposited or kept any money, documents, or other items of personal property, please state with respect to each such place of deposit:
- a. The name and address of the depository or institution.
 - b. The number or other means of identification.
 - c. The name and address of each person authorized to enter the deposit.
 - d. The date the deposit was commenced.
 - e. The date the deposit was terminated.
 - f. Identify the present contents of each said place of deposit.

ANSWER:

27. List all stocks, bonds, certificates of deposit and other securities owned or held by you either solely, jointly, or in trust, or which you owned or held during the last three (3) years, and in connection therewith state the following for each item:
- a. Identify the issuing corporation, business or other entity.

- b. Identify each stock certificate or security by number and state the number of shares represented by each certificate, and the face amount of each security.
- c. State the present location of each stock, bond, etc., presently held by you.
- d. State the beneficial owner of each stock, bond, etc., presently held by you.
- e. State the date on which you acquired each stock, bond, etc., and the purchase price of same. If you acquired the item other than by purchase, please explain how you acquired it and identify the person or entity from whom you acquired it.
- f. If you sold, transferred, assigned or gave away any of said items during the above-mentioned period of time, state the date of such sale, transfer, assignment or gift, to whom such was made, and the consideration that you received therefore if any.
- g. State the fair market value of each stock bond, etc., which you presently own or hold.
- h. Identify every stockbroker, house or firm dealing in the purchase and sale of securities with whom you have transacted business as a client during the last three years.

ANSWER:

28. List all debts and obligations, if any, that you presently, owe, and in connection therewith, state the following for each:
- a. Identify the person or entity to whom said obligation is owed (obligee).
 - b. Identify each obligor.
 - c. The consideration received in exchange for the debt or obligation.
 - d. Identify any collateral or other security for each debt or obligation.
 - e. The original amount of the debt or obligation.
 - f. The present balance owing and the terms of payment.

ANSWER:

29. If any person, firm or business holds any property for your benefit in trust or otherwise, please state, with respect to each item of property so held:
- a. Identify the person, firm or business entity to hold the property.
 - b. A description of the property held for your benefit.
 - c. The condition and terms under which the property is held for your benefit.
 - d. The value of the property so held.

ANSWER

30. If you are holding any property for the benefit of another person in trust or otherwise, please state with respect to each such item of property:
- a. Identify the beneficial owner(s).
 - b. A description of the property.
 - c. The value of the property.
 - d. The authority under which you are holding it.
 - e. The conditions or terms under which it is held.

ANSWER:

31. If you have any interest or expectancy as a legatee, heir or beneficiary in any decedent's estate, state the following:
- a. The nature of said interest or expectancy.
 - b. The value thereof.
 - c. Identify the decedent or person from whom you expect to inherit property.
 - d. Identify the administrator, executor or personal representative of the decedent.
 - e. The Court in which the estate is pending and the estate number.

ANSWER:

32. State the following for each life insurance policy on your life which is in force or was in force at the time within the last three (3) years:

- a. Identify the issuing company.
- b. The policy number.
- c. The date the policy was issued.
- d. The face amount of the policy.
- e. The present cash value of the policy.
- f. Describe all policy riders.
- g. Identify the owners of the policy.
- h. Identify the beneficiaries.
- i. Describe the risks insured against and the amount payable upon the occurrence of the insured risks.
- j. Identify the person(s) or entity(s) who paid the premiums in the last two(2) years and the amount of premiums paid by each in each year.
- k. The amount of the present yearly premium.

ANSWER:

33. Identify, describe and state the value of each item of property now held by you and/or your spouse that was:

- a. Acquired by you prior to the marriage.
- b. Acquired by you as a gift, bequest, devise or descent; or
- c. Acquired in exchange for property described in subparagraphs a and b above; or
- d. Subject to a valid agreement between you and your spouse; or
- e. Acquired as a result of the increase in value of property acquired prior to the marriage.

ANSWER:

34. As to each item of property identified in answer to the above Interrogatory, please state the following:
- a. Describe the circumstances in which you acquired the property.
 - b. Identify the person(s) or entity from whom you acquired the property.
 - c. The date of acquisition.
 - d. Identify each document which supports your claim that the item is separate property.
 - e. Identify each person who has personal knowledge of any facts supporting your claim that the item is separate property.

ANSWER:

35. State whether or not from and since the date of separation, you have made any payments by cash or check directly to creditors of debts incurred jointly by yourself and your spouse, and if so, please state:
- a. The date of such payment.
 - b. The name and address of each payee.
 - c. The amount of such payment.
 - d. The form of such payment.

ANSWER:

36. Since the date of separation, please indicate whether you have removed any cash, certificate of deposit, or other marital or non-marital property from the marital residence or otherwise changed the location of such property and for each piece of property, please state:
- a. Identify the property.
 - b. Indicate whether it is marital or non-marital.
 - c. Estimate its value.
 - d. Identify its present location.

ANSWER:

37. If you believe that you are entitled to receive maintenance payments from your spouse, state in detail why you believe you are entitled to maintenance.

ANSWER:

38. Do you claim misconduct on the part of your spouse? If yes, please state in detail each and every allegation of marital misconduct you are claiming.

ANSWER:

39. If you have any illness or chronic illness at this time, please state whether said illness prevents you from finding appropriate employment, and, if so, state the nature of such illness, the names and addresses of the doctors and hospitals you are presently treating you for such illness, the date of the onset of such illness, and the name or names of any medications which you have been taking for such condition.

ANSWER:

40. Has your spouse been a good parent to the minor children? If not, please state in detail any and all complaints you have regarding your spouse as a parent.

ANSWER:

41. Do you intend to ask for primary custody of the children in this action?

ANSWER:

42. Who has actual physical custody of said children at this time?

ANSWER:

43. How long has each child been in the actual physical custody of said person?

ANSWER:

44. Do you consider it to be in the best interest of said children to be in your custody?

ANSWER:

45. Do you claim that it is not in the best interest of your children if you spouse has the custody of the children of the marriage? If yes, please state in detail any and all reasons for that belief.

ANSWER:

46. At what address would you and the children reside if you were awarded primary custody of the children?

ANSWER:

47. Would you be able to devote your full time to the care and upbringing of the children if you were so awarded primary custody? If yes or no, please state:

a. What portion of each day do you intend to spend with said children;

- b. How do you intend to provide for the care of the children if you are at work or not at home for any other reason, naming each person and institution that will be hired for this purpose, if any;
- c. The reason that you are not able to devote your full time to the care of the minor children.

ANSWER:

48. Please state the name and address of each and every person who has information or evidence to substantiate your claim that it is now in the best interest of said minor children be placed with you.

ANSWER:

49. If you do not receive primary custody of the children of the marriage, are you going to request visitation privileges?

ANSWER:

50. If your answer to the preceding Interrogatory is in the affirmative, please state in detail what visitation privileges you will ask for:

ANSWER:

51. Please state whether you are obligated to pay any court-ordered child support or have additional children not born of the marriage in your physical custody. If so, please state:

- a. Name and age of all the children.
- b. The residence of all children.
- c. The amount of support paid for the care of all children per month.
- d. The state and court from which the obligation arose and the case number.

ANSWER:

52. Do you claim any extraordinary expenses for any child in your care or custody or for which you pay child support? If so, please state:

- a. The nature of the extraordinary expense; and
- b. The amount per month.

ANSWER:

53. State the following regarding all medical insurance policies covering yourself and/or children, or, in the alternative, attach a copy of the policy to said answer:

- a. Identify the insurance company, HMO, PPO, etc.
- b. The policy number.
- c. The date the policy was issued.
- d. The terms of the coverage.
- e. The cost of coverage, for yourself and/or children.
- f. The name and telephone number of the plan administrator.

