

CUSTODY INTERROGATORIES

1. Please list each and every witness which has information concerning any and all issues regarding the minor children in this cause (whether that information be relating to custody, shared parental responsibility, sole parental responsibility, school, daycare, religious, extracurricular, medical, psychological, criminal, or any other matter concerning the children) together with their address, phone number, and a brief statement concerning what they know that is relevant to these proceedings.

2. Do you intend to call any expert witnesses at the trial of this cause. If so, state as to each such witness their name, and business address of the witness, the witnesses qualifications as an expert, the subject matter upon which the witnesses is expected to testify, the substance of the facts and opinions to which the witness is expected to testify, and a summary of the grounds for each opinion.

3. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, and the dates you lived at each address, and your social security number, date of birth, and, if you are or have ever been married, the name of your spouse/spouses.

4. Have you ever been arrested? If so, please state when, where, and for what charge. What was the disposition of any charge connected with the arrest. Have you ever been charged with any crime? If so, please state the specific crime for which you were charged, the date for which you were charged and the ultimate disposition of the charge.

5. Do you suffer from any physical or psychological infirmity, disability, or sickness? If so, what is the nature of said physical or psychological infirmity, disability, or sickness.

6. Who is the treating physician or psychologist, or psychiatrist, or other health care provider in connection with said physical or psychological infirmity.

7. Give a name, address, and phone number for each health care provider, whether doctor, psychologist, psychiatrist, therapist, counselor, chiropractor, or any other health care provider of any type or nature whatsoever, which you have seen within the last 10 years.

10. Please state if you have ever been a party, either plaintiff, defendant, husband, wife, petitioner, or respondent in any legal action, or lawsuit, other than the present matter and, if so, please state your position (plaintiff, defendant, husband, wife, petitioner, or respondent, etc.) the nature of the action, with which the suit was filed.

11. Please state, if not specifically stated elsewhere in the answers to these interrogatories, each and every fact upon which you intend to rely on to support the proposition that you are the more appropriate primary residential parent, and your spouse is not the appropriate primary residential parent. As to each specific fact listed in this answer please state the source of the testimony you intend to rely on to introduce this fact into evidence in this cause, together with their name, address and telephone number.

12. Between you and your spouse, which of you is the parent more likely to allow the child frequent and continuing contact with the other parent? Please state each fact upon which you intend to rely to support your answer together with the name of the witness who will testify concerning each fact given in your answer.

13. Between you and your spouse, who has the strongest bond of love, affection, and emotional tie with the minor child/ren. Please state each fact upon which you intend to rely to support your answer together with the name of the witness who will testify concerning each fact given in your answer.

20. Has the minor child/ren expressed a preference regarding which parent he/she would rather reside with? What reasons has the child given to support that preference? Please state each fact upon which you intend to rely to support your answer together with the name of the witness who will testify concerning each fact given in your answer.
21. Between you and your spouse, which of you is more willing, and able, to facilitate and encourage a close and continuing a parent/child relationship between the child and the other party? Why? Please state each fact upon which you intend to rely to support your answer together with the name of the witness who will testify concerning each fact given in your answer.
22. Has there been any domestic violence or child abuse within this relationship? If so, please state each act of domestic violence or child abuse which has occurred, the date on which it occurred, and describe in detail, each such act. Please state each fact upon which you intend to rely to support your answer together with the name of the witness who will testify concerning each fact given in your answer.
23. Are there any other facts, of any type or nature whatsoever which are relevant, in any way, to the Courts determination of who would be the better primary residential parent in this cause. If so, please state each fact upon which you intend to rely to support your answer together with the name of the witness who will testify concerning each fact given in your answer.