

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF x

? JUDICIAL DISTRICT

PARTY 1 M. Last Name, )

Plaintiff, )

v. )

PARTY 2 A. Last Name, )

Defendant. )

PLAINTIFF’S  
INTERROGATORIES AND  
REQUEST FOR PRODUCTION  
(Set #1)  
Civil No:

PARTY 1 M. Last Name, by and through ?, Attorney at Law, Humphrey Law Office, respectfully requests answers to the following interrogatories in accordance with the Rule 33 of the North Dakota Rules of Civil Procedure, including information and knowledge possessed or obtainable by you, your attorneys, agents, employees and all others in privity with you. These interrogatories are hereby made continuing in nature, requiring you to supplement your answers if further information or knowledge is obtained in the future.

In accordance with North Dakota Rules of Civil Procedure, Rule 34, the undersigned further requests that you produce any document, item or thing requested to be produced herein, at the law office of the undersigned, indicated on the bottom of this document, on the date the interrogatories are due, either in person, by mail, or by arrangements with the undersigned counsel to inspect or copy the same at your counsel’s offices.

Unless otherwise specifically modified, as used, the term document includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to: correspondence, telegrams, telephone records, or other written communications, notes, memoranda, work papers, diaries, photographs, or any other writings; and the term “identify” means to set forth the date of the date (by month and year) and the substance of the contents thereof.

**If you or your attorney(s) wish to keep such answers confidential, it would be helpful if you could provide both a confidential and redacted version of your answers to these interrogatories and request for production.**

## INTERROGATORIES

1. State your full legal name, residential and work addresses, all other names by which you have been known, including but not limited to nicknames, telephone numbers at home, work, cellular and any other numbers available to you, date of birth, social security number, occupation, and the names of all persons helping you to answer these interrogatories.
2. Please state whether you intend to make parenting rights and responsibilities an issue in this matter.
3. If your answer to the above question is yes, please set forth your proposal for parenting rights and responsibilities (decision making and/or primary or equal residential responsibility and/or parenting time. Please provide your proposed parenting plan as part of the answer to this interrogatory. (A model for the parenting plan is available for download in either Microsoft Word or Adobe Acrobat PDF versions from [www.sband.org](http://www.sband.org)), and is also attached for your convenience).
4. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, have you or any individual related to you reported anyone to Social Services in regard to any suspected abuse, neglect or any other problem regarding the care of **any** child? If so, provide a description of the report including the date of the report, where the report decision making and/or primary or equal residential responsibility and/or parenting time [formerly legal and physical custody and visitation] an issue in these proceedings.
5. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, in regard to any report or allegations of abuse made, please

provide the nature of the allegations, who was the suspect of the report and what, if any, recommendations were made, as well as whether such recommendations were followed and the results of those actions. If affirmative, please provide our office any documentation you may have regarding your answer.

6. In consideration of the best interests of the child pursuant to N. D. C. C. section 14-09-06.2 and other statutes, how much time per week do you spend now with each minor child who is the subject of this action, and what do you do during your time with each child?

7. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, please describe the sleeping arrangements in your household for each minor child, both presently, and proposed, in detail, if you envision any changes from the current

8. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, as well as the North Dakota Child Support Guidelines, please list any payments you have personally made for medical, dental, or vision treatment or other out of pocket health-related expenses for each child who is/are the subject of this matter. Set forth, for each payment, the date of the payment, to whom the payment was made, and what the service was for. Provide canceled checks or receipts for payments claimed.

9. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, in particular but not limited to section 14-09-06.2(g), please answer the following question if you have during the last three years been under treatment by a physician, psychologist, or other medical person for temporary or

permanent physical or mental illness or complaint or required by the Court, state in complete detail.

- a. The nature and extent of the illness or complaint or Court Order involved;
- b. The nature of the treatment, including the date such treatment was commenced, its frequency, and the length of time you expect it to continue;
- c. The date the disability or Court Order occurred, either estimated or actual;
- d. The name, business name, address and contact information for the physician or psychologist, counselor or other provider from whom you have or are received or receiving treatment;
- e. Attach to your interrogatory responses an executed release authorizing counsel access to any records pertaining thereto as part of the requests for production; and
- f. List any current medications you are taking, the dates which you have taken them, and the reasons you take the medications.

10. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to section 14-09-06.2(j), (k) and (l), please answer the following question for each criminal, civil, domestic violence or abuse, or other incident reported to the police or other law enforcement agency in which you or each minor child have been involved, state the:

- a. Nature and substance of the complaint or incident;
- b. County and state in which the complaint or incident occurred; and
- c. Disposition of the complaint or incident.

11. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2 (f), (j), (k), (l), please answer the following question if you or each minor child have been named as a party to, cited for any offense or charged with any crime, for each matter state the:

- a. Date you were charged or cited;
- b. Offense or violation for which you were charged or cited;
- c. Date of the alleged offense or violation;
- d. Names of any persons who were witnesses to the alleged offense or Violation;
- e. Names of other individuals who were cited or charged in each such incident;
- f. Disposition or outcome of the charge or citation;
- G. Dates of any incarceration or treatment;
- h. County and state in which you were charged or cited; and
- I. Name and location of the court in which proceedings occurred as a result of the charge or citation.

12. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to section 14-09-06.2 (c), (g) and (j), please set forth in detail and not in summary fashion, your methods for disciplining each minor child, while in your care.

13. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to section 14-09-06.2 (a), (g) and (j), please state whether you have ever threatened to or injured, assaulted

molested, harmed or in any way threatened to or physically hurt each minor child in this matter, or any other child of whom you had care or control for any length of time. If your answer is in the affirmative, describe each incident of threatening or physical injury to the best of your recollection, including dates, times, places, and identify other persons who were present, with their full legal name, residential address, employer or business address, telephone and all other contact information. If specific instances are listed, state as to each incident of threatening or physical injury whether you believed your actions to be appropriate or inappropriate given the particular circumstances involved.

14. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2 (a), (g) and (j) please state whether you have ever mentally, emotionally or verbally abused or committed violence against any minor child in your care. If your answer is in the affirmative, describe each incident to the best of your recollection, including dates, times, places, and identify other persons who were present. If specific instances are listed, state as to each incident whether you believed your actions to be appropriate or inappropriate.

15. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2 (g), (j) and (k), please state whether anyone that you are aware of or resided with ever physically, emotionally or verbally assaulted or abused each minor child who is involved in this matter, or as to anyone you reside with, any other child in their care. If your answer is in the affirmative, describe each incident to the best of your recollection, including dates, times, places, and identify other persons who were present, with their

full legal name, address, and contact information. If specific instances are listed, state as to each incident whether you believed those actions to be appropriate or inappropriate.

16. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, to N.D.C.C. Section 14-09-06.2(g), (j) and (k), please state whether anyone that you are aware of or resided with ever threatened to injure, assault, molest, harm, abuse, or in any way actually physically hurt each minor child in this matter, or as to anyone you reside with, any child in their care. If your answer is in the affirmative, describe each incident to the best of your recollection, including dates, times, places, and identify other persons who were present. If specific instances are listed, state as to each incident whether you believed those actions to be appropriate or inappropriate.

17. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2(g) and (j), please state whether you have ever threatened to injure, assault, molest, harm, abuse or have in any way actually physically hurt the other parent, or anyone else with whom you have a familial or other relationship. If your answer is in the affirmative, describe each incident to the best of your recollection, including dates, times, places, and identify other persons who were present, with their full legal name, address and all contact information. If specific instances are listed, state as to each incident whether you believed your actions to be appropriate or inappropriate.

18. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2(g) and (j), please state whether you have ever physically, mentally, emotionally or

verbally assaulted or abused the other parent or anyone else with whom you have had a familial or other relationship. If your answer is in the affirmative, describe each incident to the best of your recollection, including dates, times, places, and identify other persons who were present. If specific instances are listed, state as to each incident whether you believed your actions to be appropriate or inappropriate.

19. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2(g) and (j), please state whether the other parent has ever physically, mentally, emotionally or verbally assaulted or abused you or anyone with whom they have had a familial or other relationship. If your answer is in the affirmative, describe each incident to the best of your recollection, including dates, times, places, and identify other persons who were present, with their full legal name, their address and their contact information. If specific instances are listed, state as to each incident whether you believed the actions to be appropriate or inappropriate.

20. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to section 14-09-06.2(b), (f) and (g), please state the dollar amount that you and any individual residing with you spend each month for the purchase of alcoholic beverages, on the average, for the preceding 12 months.

21. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2(b), (d), (f) and (g), please state whether you have ever attended any type of treatment program geared for substance or chemical dependency abuse. If the answer is

in the affirmative, state the name, address, telephone number, dates of treatment and recommendations that followed the treatment. State whether you are willing to sign a release for any records and if not, why not.

22. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, sections 14-09-06.2(b), (d), (f) and (g), please state whether you have ever used a controlled substance, including but not limited to marijuana, cocaine, heroin, or other illegal substances. If your answer is in the affirmative, please list specific instances and substance abused. Please also provide a copy of any and all evidence or documentation of these instances, including, but not limited to, photographs, video, or other types of evidence and documents that support your answer as part of the requests for production.

23. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2(b), (d), (f) and (g), please state whether you believe the other parent has used controlled or illegal substances. If your answer is in the affirmative, please provide a detailed description of all said instances. Please also provide a copy of any and all evidence or documentation of these instances, including, but not limited to, photographs, video, or other types of evidence and documents that support your answer as part of the requests for production.

24. In consideration of N. D. C. C. section 14-09-06.2 and other statutes involving the best interests of children, including but not limited to section 14-09-06.2 (1)(c), have you ever attended parenting classes of any type? If so, please indicate the approximate date and location, the nature or title of the class, whether attendance at said classes was

voluntary or recommended by another entity/individual, the names and addresses of all individuals who made such a recommendation or referral, name of the instructor, and please provide a copy of any certificates of completion, which you received in conjunction with each such parenting class.

25. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2(g), (j) and (k), please state whether you are aware of any incidents when the other parent has disciplined any child in a physical manner. If your statement is in the affirmative, describe each incident to the best of your recollection, including dates, times, places, and identify other persons who were present as witnesses to any said events, with their full legal name, address, telephone numbers or other contact information. If specific instances are given, state as to each instance whether you believed the discipline to be appropriate or inappropriate given the particular circumstance.

26. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to sections 14-09-06.2(c), (e) and (k), please state the residential address at which you and each child would reside if you were granted or if the other parent agreed to follow your requested terms for parenting rights and responsibilities in regard to that child (decision making and/or primary or equal residential responsibility or split residential responsibility and/or parenting time and describe with specificity each child's proposed living quarters, and whom you would reside, with their full legal name, current residential address, telephone number(s) and other contact information, along with their relationship to you.

27. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, and associated parenting rights and responsibilities (decision making and/or primary or equal residential responsibility or split residential responsibility and/or parenting time), state in detail:

- a. The proportion of each day you intend to spend with each child.
- b. Your schedule or plans for each child during your time with each child.
- c. Your schedule or plans to accommodate any special needs of each child.
- d. Your schedule or plans to accommodate any other children with whom the child has either a special relationship or friendship {e.g. step-siblings, half-siblings or other close friend(s)}.
- e. How you intend to provide for each child's care when you are unavailable (name each person and/or institution or agency that will be hired for this purpose, the reason for your choice, their full legal name, address, telephone number, contact information and provide their resume' and/or references as part of your production of documents in this matter).

28. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to section 14-09-06.2 (k), in regard to parenting rights and responsibilities (decision making and/or primary or equal residential responsibility, split residential responsibility and/or parenting time, set forth the names, addresses, and telephone numbers or other contact information of any and all persons you know who have any knowledge or information concerning relevant facts about the issues in this case, and for each, state the nature of the knowledge or information and the length of time you have known each other, and the exact nature of

your relationship with that person, along with their full legal name, address, place of employment or business, and their contact information.

29. Set forth the name, address, contact information and place of employment of every individual whom you or your legal counsel intend to call as a witness or expert witness in this proceedings should this matter eventually be heard as a contested final hearing or trial not otherwise indicated above or in other interrogatories. Set forth in detail the subject matter upon which each witness is expected to testify, and your relationship to each such witness. Please supplement your answers in accordance with any order.

30. State whether you have any written statements or reports from any persons identified in any other interrogatory answer, and if so, please attach copies of any such reports or statements as part of your production of documents in this matter. Do you or anyone else have any drawings, letters, other written memorandum, graphs, written record, charts, photographs, tape or electronic recordings, and/or video records or other media, whether electronic or otherwise, regarding yourself, the other parent and/or each minor child involved in this matter? If so, in consideration of the best interests of the child as enumerated in N. D. C. C. section 14-09-06.2 and other statutes, please:

- a. Identify each such drawing, graph, chart, photograph, tape or electronic recording, and/or video recording, or other media, whether electronic or otherwise, and state the subject matter thereof;
- b. Identify the persons and/or things whose visage or voice is contained in such photograph, tape or electronic recording, and/or video recording; and
- c. Identify the persons taking the photographs or making the tape or electronic

recordings, and/or video recording.

d. Describe and provide such letter or written memorandum, specifically, including the date, the person, writing such document, and whom each is addressed or directed;

e. Provide all such media as part of the request for production in this matter, or access thereto to the undersigned in accordance with this request.

31. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, including but not limited to N. D. C. C. sections 14-09-06.2 (1), (k), please identify your relationship with your own and the other parent's extended family; give specific examples and details of events and how they impact your relationship with each minor child. As part of your answer, please provide the full legal names, addresses and contact information of all individuals for whom such information is not available to the other parent.

32. In consideration of the North Dakota Child Support Guidelines, at N. D. A. C. section 75-02-04.1 and other statutes regarding child support, what do you believe is an appropriate use of money either received or paid for child support?

33. In consideration of the rebuttal section to the North Dakota Child Support Guidelines, at N. D. A. C. section 75-02-04.1 (9), please provide the following in the event that you are required to pay child support, for proper consideration of all income and expenses:

a) In regard to subsection (1) (a), do you expect to request a rebuttal to the guideline amount based upon your subsistence needs, work expenses, and daily living expenses, and if so, for what items, and in what amounts?

- b) In regard to subsection (1) (b), do you expect a rebuttal based upon the other parent's income? If so, for what reason, and in what amount?
- c) In regard to subsection (2) (b), do you expect to earn or have income from any source considered by the guidelines, in excess of \$12,500 per month?
- d) In regard to subsection (2) (c), do you expect each or any child who is the subject of this action, to attend a private school? If so, please indicate which private school each child would attend, and an itemization of all costs associated with attendance therein.
- e) In regard to subsection (2) (d), describe with particularity and not in summary fashion, any special needs, chronic illness or disabling condition(s) of each minor child who is involved in this action, along with your understanding of their diagnosis, prognosis, general condition on a daily basis, expected expenses involved, the duration of such expenses, and your plan of action related to those special needs, chronic illness or disabling condition(s).
- f) In regard to subsection (2)(e), please provide your expectations as to any increased expenses or needs for each minor child who is involved in this action, once they reach age 12.
- g) In regard to subsection (2)(f), please provide the actual cost and details regarding childcare expenses for each minor child, and indicate whether you are willing to help cover such costs and expenses, either in full or partially.

35. In consideration of N. D. C. C. section 14-09-06.2, and other statutes involving the best interests of children, and all of the factors that will be considered to determine which parent has the better ability to provide care and nurturance for each minor child

who is the subject of this action, and a determination of parenting rights and responsibilities (decision making and/or primary or equal residential responsibility or split responsibility and/or parenting time) and control of each child, please **describe in detail** and not in summary fashion how the following factors from the statute indicated below apply specifically between the other parent and each child and then between you and each child. Please give specific instances, with dates, times, places and witnesses in relation to each provision which support your position and identify all such witnesses with full legal names, addresses, telephone numbers and other contact information (the statute is provided for your ease of reference in answering each section, and each section is considered a subpart to these interrogatories and request for production:

**§ 14-09-06.2. Best Interests and welfare of child--Court consideration--Factors**

1. For the purpose of parental rights and responsibilities, the best interests and welfare of the child is determined by the court's consideration and evaluation of all factors affecting the best interests and welfare of the child. These factors include all of the following when applicable:

- a. The love, affection, and other emotional ties existing between the parents and child and the ability of each parent to provide the child with nurture, love, affection, and guidance.
- b. The ability of each parent to assure that the child receives adequate food, clothing, shelter, medical care, and a safe environment.
- c. The child's developmental needs and the ability of each parent to meet those needs, both in the present and in the future.
- d. The sufficiency and stability of each parent's home environment, the impact of extended family, the length of time the child has lived in each parent's home, and the desirability of maintaining continuity in the child's home and community.
- e. The willingness and ability of each parent to facilitate and encourage a close and continuing relationship between the other parent and the child.
- f. The moral fitness of the parents, as that fitness impacts the child.

- g. The mental and physical health of the parents, as that health impacts the child.
- h. The home, school, and community record of the child and the potential effect of any change.
- i. If the court finds by clear and convincing evidence that a child is of sufficient maturity to make a sound judgment, the court may give substantial weight to the preference of the mature child. The court also shall give due consideration to other factors that may have affected the child's preference, including whether the child's preference was based on undesirable or improper influences.
- j. Evidence of domestic violence. In determining parental rights and responsibilities, the court shall consider evidence of domestic violence. If the court finds credible evidence that domestic violence has occurred, and there exists one incident of domestic violence which resulted in serious bodily injury or involved the use of a dangerous weapon or there exists a pattern of domestic violence within a reasonable time proximate to the proceeding, this combination creates a rebuttable presumption that a parent who has perpetrated domestic violence may not be awarded residential responsibility for the child. This presumption may be overcome only by clear and convincing evidence that the best interests of the child require that parent have residential responsibility. The court shall cite specific findings of fact to show that the residential responsibility best protects the child and the parent or other family or household member who is the victim of domestic violence. If necessary to protect the welfare of the child, residential responsibility for a child may be awarded to a suitable third person, provided that the person would not allow access to a violent parent except as ordered by the court. If the court awards residential responsibility to a third person, the court shall give priority to the child's nearest suitable adult relative. The fact that the abused parent suffers from the effects of the abuse may not be grounds for denying that parent residential responsibility. As used in this subdivision, "domestic violence" means domestic violence as defined in [section 14-07.1-01](#). A court may consider, but is not bound by, a finding of domestic violence in another proceeding under chapter 14-07.1.
- k. The interaction and interrelationship, or the potential for interaction and interrelationship, of the child with any person who resides in, is present, or frequents the household of a parent and who may significantly affect the child's best interests. The court shall consider that person's history of inflicting, or tendency to inflict, physical harm, bodily injury, assault, or the fear of physical harm, bodily injury, or assault, on other persons.
- l. The making of false allegations not made in good faith, by one parent against the other, of harm to a child as defined in [section 50-25.1-02](#).

m. Any other factors considered by the court to be relevant to a particular parental rights and responsibilities dispute.

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

37. Please set forth whether you intend to encourage a relationship and contact between each child and the other parent if you are determined appropriate to exercise parenting rights and responsibilities (decision making and/or primary or equal residential responsibility, or split residential responsibility and/or parenting time), and how you intend to do so, in a detailed and not in summary fashion.

38. Please list all persons with whom you have had sexual relations or contact during the course of your marriage, other than your spouse. As to each such relations or contact, state the following in detail:

- a) person's full legal name, address and contact information;
- b) that person's marital status at the time;
- c) if that person and you spent the night together;
- d) whether each or any child who is involved in this action was aware of the sexual relations or contact;
- e) if there were any conceptions as a result;
- f) what happened to those conceptions.

39. In consideration of N. D. C. C. section 14-09-06.2, and the best interests of minor children, as to each child involved in this matter, do you claim that they prefer to live with you? If so, state:

- a) the date upon which each child expressed the preference;

- b) the circumstances given rise to such expression;
- c) words used by each child in expressing such preference;
- d) If the preference has not been expressed to you, state the basis for your contention that the children desire to live with you, if you contend that each child does desire to live with you.

40. Please describe the household duties performed by each child involved in this matter, listing the specific duties for each child, and what you do in regard to such duties.

41. Are you currently employed? Please complete the attached Financial Affidavit as part of your answers to these Interrogatories and Request for Production of Documents; please attach all documents supporting your answers to the Financial Affidavit.

42. State all assets and their value held by either you, your spouse, or being held for you by any other person or entity, and describe in detail, with valuations, legal descriptions, and all other identifying information:

- a) Real Estate.
- b) Financial Accounts whether at banks, other locations, with account numbers, and all other information requested above.
- c) Investments, with account numbers and all other information requested above.
- d) Vehicles and recreational.
- e) Household Items in any location.
- f) Retirement Assets, Accounts at any location, with account numbers and

other information requested.

g) Any other assets or property of any description not otherwise listed above.

43. As of the date of answering these interrogatories, what is the amount of cash or financial account money to which you have immediate access that you currently have under your control, or under the control of any third party? Describe in detail all amounts, locations, and the names under which such cash is currently held.

44. As of the date of the Summons and Complaint served upon you in this matter, what is the amount of cash or financial account money to which you have immediate access that you currently have under your control, or under the control of any third party? Describe in detail all amounts, locations, and the names under which such cash is currently held.

45. As of the date of answering these interrogatories, and for the previous two years prior to answering, did you have any separate accounts in any financial institution to which your spouse did not have access? If so, for each account please give the following:

a) Name and all contact information for such institution;

b) Type of account, account number and in whose names such account(s) was/are held;

c) Name(s) of all persons having or who have had access to such account(s);

d) Balance in such account(s) as of the date of service of the Summons and Complaint upon you;

e) Balance currently in any such account(s);

f) Balance two years prior to service of the Summons and Complaint;

g) Dates upon which accounts were closed, if closed;

h) Amounts held in the account upon the date of closing, and five days prior to closing;

i) Where such monies are either currently held, or the use made of such monies.

46. Have you closed any joint accounts held with your spouse? If so, explain in detail your reasons for doing so.

47. Do you maintain any retirement accounts other than those for which you have previously provided information to this office? If so, please provide all information related to said accounts.

48. Do you own or are you entitled to any property you believe to be separate from the marital estate and to which you alone are entitled? If so, explain why such property is not marital property (other than clothing and toiletries), and the value you place upon such property.

49. State all present separate and joint debts of any nature whatever, along with the name of the creditor, any third party creditor or collection agency, their contact information, the date the debt was incurred, the reason for the debt, whether your spouse was involved with or knew about the debt when incurred, and the original and current balances due, along with interest currently due and the current schedule for repayment of the debt, along with the date each payment is due.

50. Please estimate and itemize your monthly living expenses, separating those that are attributable to yourself, and to your dependents, in detail.

51. Do you share living expenses with anyone else? If so, state the name, contact

information and relationship of yourself to such person(s), and list the amounts paid by such person(s) along with a description of the reasons and type of living expense so shared.

52. Have you made any transfers of money or property within the past year?

If so, please indicate the person or entity to whom such money or property was transferred, the amounts, and the reason for such transfer(s).

53. Identify all witnesses you expect to call at the trial in this matter, with all contact information, their relationship to you, the substance and facts to which they are expected to testify, and a summary of their testimony.

54. Identify all persons or entities having personal or financial information in regard to the parties in this matter, or in regard to the minor children of the parties; please also provide all names, contact information, relationship to you, your spouse or the minor children, and what matters you believe they could address.

55. Identify all experts you intend to call at the trial of this matter, including their name(s), contact information, curriculum vitae or resume', the substance of their testimony, the facts upon which they will testify, their expected opinion, and the general subject matter of their testimony. Attach a copy of their curriculum vitae' or resume' to your answers as part of the request for production, as well as any documents upon which they will be relying to form their opinion.

56. Do you contend that your spouse has made any statements to you or to anyone else which would constitute an admissions against interest, admission to party opponent, or constituting any statement regarding matters material to this matter? If so, please state all such information in detail, with specificity as to the exact nature of the statement, to

whom the statement was made, the date, time and place the statement was made, and any other information regarding such statements or admissions.

57. In regard to INCIDENT, is it your intent to reimburse her for all costs and expenses regarding this incident? If so, when do you plan on doing so?

**Request for Production of Documents**

1. Please provide all documents as previously requested in any of the interrogatories above.
2. Please provide all documents supporting any of your answers to the interrogatories above.
3. Please provide copies of all documents supporting all valuations of all property indicated in the interrogatories above.
4. Please provide copies of all check registers and bank statements on any financial account in which you have had either a separate interest, an interest with your spouse, or an interest with any third person for the past year.
5. Please provide copies of your life insurance policy(ies), including all documentation related to them.
6. Please provide copies of all credit card, loan or other debt-related statements or other financial information associated with said accounts in your name alone, your name jointly with your spouse, or with any other third person or entity.
7. Please provide copies of all documentation or computer records of all Webkinz or other points you have accrued for the children in this action over the past year.
8. Please provide a copy of any or all frequent flyer mileage points, amounts

accrued and the valuation of said points.

9. Have you been informed that you are under oath and that your answers to these interrogatories, as well as the media provided in response to request for production of documents, could be used at trial or in any hearing in this matter?

Dated this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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ATTORNEY, (ND ID #)  
Attorney for PARTY 1 M. Last Name