

IN THE CIRCUIT COURT FOR _____ COUNTY, MARYLAND

)	
Plaintiff)	
vs.)	Case No. _____, Family Law
)	
Defendant)	

INTERROGATORIES
Pursuant to Maryland Rules

TO: (Opponent's name), [Plaintiff/Defendant]

FROM: (Client's name), [Plaintiff/Defendant]

Instructions

Pursuant to Rule 2-421, you are required to answer the following interrogatories within 30 days or within the time otherwise required by court order or by the Maryland Rules:

(a) In accordance with Rule 2-421(b), your response shall set forth the interrogatory, and shall set forth the answer to the interrogatory "separately and fully in writing under oath" or "shall state fully the grounds for refusal to answer any interrogatory." This response shall be signed by you. (Standard Instruction (a).)

(b) Also in accordance with Rule 2-421(b), your answers "shall include all information available" to you "directly or through agents, representatives, or attorneys." (Standard Instruction (b).)

(c) Pursuant to Rule 2-401(e), these interrogatories are continuing. If you obtain further material information before trial you are required to supplement your answers promptly. (Standard Instruction (c).)

(d) If pursuant to Rule 2-421(c), you elect to specify and produce business records of

yours in answer to any interrogatory, your specification shall be in sufficient detail to enable the interrogating party to locate and identify the records from which the answer may be ascertained. (Standard Instruction (d).)

(e) If you perceive any ambiguities in a question, instruction, or definition, set forth the matter deemed ambiguous and the construction used in answering. (Standard Instruction (e).)

General Definitions

In these interrogatories, the following definitions apply:

(a) **Document** includes a writing, drawing, graph, chart, photograph, recording, and other data compilation from which information can be obtained, translated, if necessary, through detection devices into reasonably usable form. (Standard General Definition (a).)

(b) **Identify, identity, or identification**, (1) when used in reference to a natural **person**, means that **person's** full name, last known address, home and business telephone numbers, and present occupation or business affiliation; (2) when used in reference to a **person** other than a natural **person**, means that **person's** full name, a description of the nature of the **person** (that is, whether it is a corporation, partnership, etc. under the definition of **person** below), and the **person's** last known address, telephone number, and principal place of business; (3) when used in reference to any **person** after the **person** has been properly identified previously means the **person's** name; and (4) when used in reference to a **document**, requires you to state the date, the author (or, if different, the signer or signers), the addressee, the **identity** of the present custodian of the **document**, and the type of **document** (e.g., letter, memorandum, telegram or chart) or to attach an accurate copy of the **document** to your answer, appropriately labeled to correspond to the interrogatory. (Standard General Definition (b).)

(c) **Person** includes an individual, general or limited partnership, joint stock

company, unincorporated association or society, municipal or other corporation, incorporated association, limited liability partnership, limited liability company, the State, an agency or political subdivision of the State, a court, and any other governmental entity. (Standard General Definition (c).)

Additional Definitions

(a) **Employer** means any **person** that has compensated, or is obligated to compensate, you for services. (Standard Domestic Relations Definition (a).)

(b) **Fringe benefits** include: (1) contributions made by your **employer** to health insurance, life insurance, disability insurance, pension, profit sharing, or retirement plans; and

(2) **employer** reimbursements or payments that reduce your personal living expenses such as use of a company car, expense accounts, and housing. (Standard Domestic Relations Definition (b).)

(c) **Property** includes:

(1) accounts in any financial institution or brokerage, including certificates of deposit;

(2) cash;

(3) debts owed to you, secured or unsecured, actual or contingent;

(4) home furnishings, jewelry, furs, stamp or coin collections, antiques, and works of art;

(5) intellectual property, including patents, royalties, and copyrights;

(6) interests in any entity, including partnerships, joint ventures, and corporations;

(7) interest in improved or unimproved real property, including leaseholds,

condominiums, and time share interests;

(8) life insurance and annuities;

(9) military or federal retirement benefits;

(10) pension plans, profit sharing plans, individual retirement accounts, and retirement plans;

(11) securities, including stocks, bonds, mutual funds, United States Government obligations, options, and debentures;

(12) vehicles, boats, aircraft, equipment, machinery, crops, livestock, and poultry;

(13) workers' compensation claims and tort or contract claims against another; and

(14) any other interest or asset. (Standard Domestic Relations Definition (c).)

(d) **Wages** include hourly **wages**, salary, bonuses, tips, incentive awards, fees, commissions, self-employment income and overtime pay. (Standard Domestic Relations Definition (d).)

INTERROGATORIES

[Witnesses]

1. **Identify** each **person**, other than a **person** intended to be called as an expert witness at trial, having discoverable information that tends to support a position that you have taken or intend to take in this action, and state the subject matter of the information possessed by that **person**. (Standard General Interrogatory No. 1, modified.)

2. **Identify** each **person** whom you expect to call as an expert witness at trial, state the subject matter on which the expert is expected to testify, state the substance of the findings

and opinions to which the expert is expected to testify and a summary of the grounds for each opinion, and, with respect to an expert whose findings and opinions were acquired in anticipation of litigation or for trial, summarize the qualifications of the expert, state the terms of the expert's compensation, and attach to your answers any available list of publications written by the expert and any written report made by the expert concerning the expert's findings and opinions. (Standard General Interrogatory No. 2.)

[Documents]

3. If you intend to rely upon any **documents** or other tangible things to support a position that you have taken or intend to take in the action, provide a brief description, by category and location, of all such **documents** and other tangible things, and **identify** all **persons** having possession, custody, or control of them. (Standard General Interrogatory No. 3., modified)

4. **Identify** any written or recorded statements in your possession, custody or control made by any **person** (including yourself) concerning any issue alleged in this case.

5. **Identify** and describe all written or recorded statements, e-mails, video tapes and/or audio tapes in your possession, custody or control made by any individual (including yourself) concerning any issue alleged in this case. Include in your answer the exact contents, verbatim, of any written or recorded statement of the Plaintiff/Defendant, video tape, audio tape, e-mails, or any letter or other documents written to or by the Plaintiff/Defendant in your actual or constructive possession pertaining to any aspect of this action. You may answer this Interrogatory by attaching copies of any written or recorded statements of the Plaintiff/Defendant, video tape, audio tape, e-mails, or any letter or other document which is in your actual or constructive possession pertaining to any aspect of this action.

[Personal Information]

6. **Identify** yourself and all individuals with whom you reside. For each individual other than yourself, state that individual's age, relationship to you, and marital status. State your own birth date and social security number. (Standard Domestic Relations Interrogatory No. 1.)

[Education]

7. Describe your educational background. Include in your answer the highest grade you completed; the name and date of any degree, diploma, or certificate you received, and the name of the institution conferring the degree, diploma, or certificate; and any specialized training you have received. (Standard Domestic Relations Interrogatory No. 2.)

[Employment]

8. If you are currently employed in any capacity, **identify** each current **employer** and, for each employment, state: (a) your job title, (b) your duties, (c) the number of hours in your average work week, (d) your regular pay period, (e) your gross **wages** per pay period, and (f) the deductions per pay period made by your **employer** from your **wages**. If overtime work was available to you during the past 12 months, state: (a) the number of overtime hours you worked during the 12 months and your rate of pay for those hours and (b) the number of overtime hours that were available to you during the 12 months but that you did not work and the rate of pay you would have received if you had worked those hours. (Standard Domestic Relations Interrogatory No. 3.)

9. Describe the nature and amount of any **fringe benefits** that you receive as a result of your employment. (Standard Domestic Relations Interrogatory No. 4.)

10. Please give a detailed list of any and all perquisites which you have received from (Opponent's business) from January 1, (Year) through the date of trial.

11. If you are unemployed, describe your efforts to obtain employment since you became unemployed, **identify** each prospective **employer** and employment agency you have contacted while seeking employment and state the date of each contact. (Standard Domestic Relations Interrogatory No. 5.)

12. Please list each and every effort made by you during the past two years to secure gainful employment, including: the dates attempts were made; the name, address and telephone number of the individual or entity to whom the inquiry was directed; the position applied for; the salary being offered for said position; whether or not a job was offered, and if so, why it was refused.

13. If you claim you are physically or mentally unable to work or your capacity to work is limited, state the facts upon which your claim is based and **identify** all **persons** with personal knowledge of those facts. (Standard Domestic Relations Interrogatory No. 6.)

14. For each employment that you have had during the past five years other than any current employment, **identify** each **employer** and for each employment state: (a) the dates of employment, (b) your duties, (c) your **wages**, and (d) your reason for leaving the job. If you were unemployed for any period of time, specify the amount and source of any income that you received while unemployed. (Standard Domestic Relations Interrogatory No. 7.)

15. If you are self-employed currently or were self-employed at any time since _____, 200_, **identify** the business you conducted, your business's gross receipts each of the past three calendar years and for the current year, and your itemized business expenses each of the past three calendar years and for the current year.

[Career Objectives]

16. Describe your career objectives and plans to progress toward becoming self-

supporting, including in your answer the time and cost you contend is necessary for you to gain sufficient education or training to enable you to find suitable employment.

[Voluntary Impoverishment]

17. If you contend that the Plaintiff/Defendant voluntarily impoverished himself/herself by virtue of his termination from employment with _____ and obtaining his current employment, state all facts upon which you rely in support of your contention.

[Other Monies Received]

18. **Identify** the sources and amounts of all taxable and non-taxable income you received during the past five years. (Standard Domestic Relations Interrogatory No. 8.)

19. **Identify** the sources and amounts of any other moneys and credit(s) you received during the past five years with an aggregate value in excess of \$250 in any one year, including gifts, loans from others, loans repaid to you by others, sales of assets, and untaxed distributions. (Standard Domestic Relations Interrogatory No. 9.)

20. Itemize the date, nature, and amounts any **persons** have contributed, whether directly or indirectly, to payment of any indebtedness or living expense of yours since January 1, (Year).

[Unreported/hidden Income]

21. If you contend your spouse received or is receiving income in an amount greater than reported on federal and/or state income tax returns, please provide the details, which are to include, but not be limited to: the year in which said income was received, the amount of said income, the source of said income, the names, addresses and telephone numbers of all other individuals having knowledge of this allegation, provide all facts upon which you rely in support of this allegation, identify all documents which corroborate this allegation and for each year in

which you allege this income was received, state the disposition made of such income.

[Property/Assets]

22. List each item of **property** in which you have any interest. For each item listed, state how it is titled, its value, the amount of any present lien or mortgage on the **property**, the date of acquisition of the **property**, and the identity of any other **person** with an interest in the **property**. If you claim that any **property** listed is not marital **property**, state the facts upon which you base your claim, including all sources of funds used for the acquisition of the **property** and **identify** all **persons** with personal knowledge of those facts. (Standard Domestic Relations Interrogatory No. 10.)

23. If you have presented any financial statements, or any written applications, individually or on behalf of any business or other entity in which you have any interest, to any lending institution, other entity, or individual for the purpose of obtaining a loan, refinancing a loan, obtaining credit, a mortgage, or for any other reason at any time from _____, 200__, to the date of trial, state the exact name, address and telephone number of each such entity or individual, date of application and purpose of application, and attach a legible copy of each such financial statement or application.

24. If you have, or had, from January 1, (Year) through the date of trial, any interest in bank or savings and loan associations, credit union or savings or checking accounts, identify same, giving the name and address of the institution with which such account is held, the account numbers, the dollar balance of each at the time these Interrogatories were served on you, the date and amount of the highest dollar balance, and explain in detail the nature and amount of any liens against or interest of others (including names and addresses) in each of said accounts.

25. If you have any interest in, have used or have had your name been on any safe

deposit box(es) from January 1, (Year) through the date of trial, please provide the box number, the name, address and telephone number of the institution where the box is located, and the contents of the box.

26. State the name, address and telephone number of any stockbroker or brokerage firms with which you deal or have dealt from January 1, (Year) through the date of trial, and the identifying number of each and every account.

27. State the name, address and telephone number of any accountant(s) you have used for business or personal reasons from January 1, (Year) through the date of trial.

[Business Interests]

28. With respect to any business enterprise, including but not limited to any sole proprietorship, partnership, joint venture or corporation which you own or invested in, or in which you have or had any direct or indirect interest, either individually or with any other person, at any time since January 1, _____, state: the amount of any financial contribution made by you to the establishment, acquisition and operation thereof and the source of your funds; your ownership, investment and other interest therein; the gross receipts of the business for each of the past four calendar years, the current year, and through the date of trial; ordinary and necessary expenses of the business for each of the past four calendar years, the current year, and through the date of trial; the net income of the business for each of the past four calendar years, the current year, and through the date of trial; a complete itemization of the assets and the liabilities of the business; and the expense reimbursements or in-kind payments received by you in the course of operation of the business which reduce your personal living expenses for each of the past four calendar years, the current year, and through the date of trial.

[Retirement Plans]

29. If you have any interest in any retirement, profit sharing, deferred compensation, or pension plan or fund, including an Individual Retirement Account or Keogh Plan, state as to each plan: the plan name of the plan; the name and address of the custodian or administrator; the percent of your present vesting; the name of any contributing employer; the total amount of your contributions; the total amount of your employer's contributions in your behalf; the present balance of your interest; the earliest date upon which you are entitled to receive actual benefits; the amount of benefits and the method of payment to you upon retirement of any funds; your beginning date of employment with the plan originator; the date upon which you began as a plan participant; your last date of employment with the plan originator, if said employment has been terminated; the last date upon which you were a plan participant, if your participation has been terminated; and the present value of your interest.

30. List each life insurance, annuity and/or disability policy in which you have any interest or have had any interest in the past three (3) years, stating for each the name and address of the insurance company; the policy number; the type of policy; the name and address of the owner of the policy; the name and address of the present beneficiary of the policy; and, if there have been any changes in beneficiaries in the last three (3) years, give the date of each change and the name and address of the former beneficiary; the date the policy was issued; the face amount of said policy; the amount of annual premiums; the cash surrender value of the policy, and if any loans have been taken out against the policy, the date of each loan, the person making the loan, the amount of the loan, and the purpose for which the proceeds were utilized; if the policy has been assigned, the date of assignment and the date and address of each assignee, the present custodian of the policy; and, if the policy is supplied by your employer, under what conditions it terminates.

31. If you are a member of a partnership, please provide the name, address and telephone number of all partners, the amount of drawings or earnings for each partner, an accounting of all monies drawn from the partnership or charged to your drawing or capital account, statement of your capital account, at the beginning and end of each year and an itemization of all expenses paid for travel, entertainment, petty cash and personal items for you from January 1, (Year) through the date of trial.

32. List all bonds, including but not limited to, U.S. Savings Bonds, corporate bonds, municipal bonds or any other type of bond, owned, held, purchased or sold, redeemed or disposed of by you from January 1, (Year) through trial, whether held in your name, individually, jointly, in common, as trustee for any other person, custodian for any person or as a beneficiary or *cestui que* trust, or in which you have any beneficial interest.

33. If there have been any bank accounts on which your name did or does not appear in which you have deposited any money or withdrawn any money, for each account, please provide the name and address of the bank, the name and the number of the account, the date the account was opened and (if applicable) closed, the amount of money deposited or withdrawn on each occasion by you, the current balance in each account, if the account has been closed, the balance, when it was closed, and the highest balance from January 1, (Year) through the date of trial.

34. If you, either alone or with anyone other than your spouse, transferred **property** during the last five years of your marriage with a value in excess of \$250 to any **person** other than your spouse without receiving full consideration in money or money's worth for the **property** transferred, **identify** each **person** to whom a transfer was made and the **property** transferred, giving the date and method of transfer and the value of the **property** at the time of

transfer. (Standard Domestic Relations Interrogatory No. 11.)

[Marital/Non-marital Property]

35. If you received any assets during the marriage by way of gift or inheritance, whose value exceeds \$250, please identify each and every asset. A sufficient answer to this question must include the name, address and telephone number of the donor, the date of the transaction and the value of the item received.

36. If you contend that you owned assets prior to the marriage to which you now make a claim, please list each and every asset. A sufficient answer to this interrogatory should include the value of the asset, and the means utilized by you to arrive at said value.

37. Describe in detail each and every item of personal property, whose value exceeds \$250, owned by you or the &Client& prior to the marriage which may be traceable by you to a form which currently exists today.

[Undisclosed/Dissipated Asset]

38. If you contend your spouse owns or owned, legally or beneficially, directly or indirectly, any asset as to which full disclosure has not been made, or with respect to which there has been any disposition that is improper, illegal or otherwise not related to marital purposes, please provide all details, to include, but not be limited to, the identify of the asset, the date of its acquisition, the person or entity from whom the asset was acquired, the fair market value at the time of acquisition and at either the present time or at the time of its disposition and if you allege the asset was disposed of, state the date of its disposition and **identify** the **person** to or through which such disposition was effected.

[Changes to Financial Statement]

39. If the information contained on your financial statement submitted pursuant to

Rule 9-202(e) or (f) has changed, describe each change. (Standard Domestic Relations Interrogatory No. 12.)

[Liabilities]

40. List all liabilities you have, setting forth as to each the name of the creditor, the amount due, the reason for the debt, whether a document evidences the debt, and the amount and frequency of the payments.

[Support]

41. State by type and amount all support provided by you for your spouse and children since the date of your separation. (Standard Domestic Relations Interrogatory No. 13.)

[Grounds for Divorce]

42. State the date on which you separated from your spouse and describe the circumstances of the separation. (Standard Domestic Relations Interrogatory No. 14.)

43. If you contend that you are entitled to a divorce because your spouse's conduct toward you or your minor child was cruel or vicious or that your spouse constructively deserted you, describe your spouse's conduct and state the date and nature of any injuries sustained by you or your minor child and the date, nature, and provider of health care services rendered regarding the injuries. **Identify** all **persons** with personal knowledge of your spouse's conduct and all **persons** with knowledge of any injuries you or your minor child sustained as a result of that conduct. (Standard Domestic Relations Interrogatory No. 15.)

44. State the date on which you and your spouse last had sexual relations with each other. (Standard Domestic Relations Interrogatory No. 16.)

45. If you have had sexual relations with a **person** other than your spouse during your marriage, **identify** the **person(s)** with whom you have had sexual relations, state the date of each act of sexual relations, and state the location where each act took place. If you refuse to answer this interrogatory as framed because the answer would tend to incriminate you, so state and answer for the period ending one year prior to the date of your answers. (Standard Domestic Relations Interrogatory No. 17.)

46. If you have had sexual relations with a **person** other than your spouse during the marriage and you contend that your spouse has forgiven or condoned your actions, state the facts upon which your contention is based. (Standard Domestic Relations Interrogatory No. 18.)

47. Please give the name, address and telephone number of any detective hired by you or your attorney to obtain information regarding the activities of the [Plaintiff/Defendant].

48. List the name, address and telephone number of any and all persons with whom you claim the [Plaintiff/Defendant] committed adultery, and detail each and every instance.

49. If you, since the date of your marriage, committed adultery and/or had sexual relations/contact with any person other than your spouse, please give the name, address and telephone number of each and every individual with whom you committed adultery and/or each and every individual with whom you had sexual relations/contact; the dates and places of each act; and the name, address and telephone number of each and every individual with knowledge of each act.

50. Please state whether or not you deserted your (Spouse) and (dependents)

on (Month day, year), and if the answer to this question is no, please explain, in detail, the reasons why you left the marital home.

51. Please give the name, address and telephone number of each and every individual who can corroborate the facts enumerated in answer to Interrogatory No. 47 above.

52. If you contend that your spouse is not entitled to a divorce on the grounds alleged in [his/her] pleadings, then state all facts which support your contention, and **identify** those **persons** who have personal knowledge of these facts.

53. If you contend that your spouse was totally or partially responsible for the estrangement of you and your spouse, state the facts upon which you base your contention and **identify** those **persons** who have personal knowledge of these facts.

[Child Custody - Fitness]

54. If you contend that your spouse is unfit to have custody of the children, state the facts upon which your contention is based and **identify** all **persons** having personal knowledge of these facts. If your contention is based on the use of controlled dangerous substances or the abuse of alcohol on specific occasions, **identify** the substance used, the other **persons** present at the time of the use, and the date, time, and place of the use. If your contention is based on the repeated use of controlled dangerous substances or the repeated abuse of alcohol, **identify** the substance and all **persons** with personal knowledge of the repeated use or abuse. (Standard Domestic Relations Interrogatory No. 19.)

[Medical Care Providers]

55. If you have sought or received treatment or therapy at any time during the

past 10 years for any physical, mental, or emotional condition, including drug addiction or alcoholism, describe the condition and the treatment or therapy provided, state the date or dates of treatment or therapy, and **identify** all **persons** providing treatment or therapy. (Standard Domestic Relations Interrogatory No. 20.)

[Child Custody]

56. If you contend that placing the children in your sole, shared, or joint custody will be in their best interest, specify the facts and circumstances upon which you rely. (Standard Domestic Relations Interrogatory No. 21.)

57. Describe the child care plan you intend to follow when the children are with you. Include in your answer a description of the place where the children will reside, specifying the number of bedrooms, bathrooms, and other rooms, the distance to the school which the children will attend, and the **identity** of all other **persons** who will be residing in that household. **Identify** all **persons** who will care for the children in your absence, state the hours during which they will care for the children, and the location where the care will be provided. (Standard Domestic Relations Interrogatory No. 22.)
{NOTE: Although not part of Standard Domestic Relations Interrogatory No. 22, you may want to also ask “the actual cost of the child care expense.”}

58. Describe in detail the health and well-being of your child since her date of birth.

59. Describe in detail all developmental and recreational activities you have engaged in with your child since January 1, (Year), including in your answer the dates you engaged in such activities and the names of any and all persons present during such activities.

60. If there are currently or have been in the past disagreements between you and Plaintiff/Defendant as to major issues affecting the welfare of the minor child, state all pertinent facts concerning such disagreement(s), including but not limited to the nature of the disagreement, the position taken by each of you, and how, if at all, said disagreement was resolved.

61. If you contend that you and Plaintiff/Defendant do not agree on the children's education, child care, religious training, discipline, or medical care, state how you differ from each other, and state the facts and circumstances that support your contention.

62. If you have any complaints, concerns or criticism of Plaintiff's/Defendant's parenting of the minor children, state with particularity each complaint, concern or criticism, and **identify** all **persons** with personal knowledge of these facts.

63. State the specific custody and access schedule you contend is in the best interest of the minor children including but not limited to when the minor children would spend time with each parent, and explain why the schedule would be in the best interests of the minor children.

64. If you or anyone in your household (or anyone who has cared for your child(ren) has been arrested for or convicted of any alcohol- or drug-related offense, or of any other criminal offense, since _____, state as to each charge the date of arrest, the charge, the court and case number, the trial date, the disposition, and the disposition date.

65. State with particularity and in detail what conversations you have had with the minor child(ren) relative to the issues in this case and the substance of said

conversations, specify who initiated said conversation. Include in your answer what, if anything, the minor child(ren) has communicated to you or anyone else about her preferences about her living arrangements, about the relationship between the minor child(ren) and the other parent, about the relationship between the minor child(ren) and you and, specifying form (written or oral), the substance of the communication, date, time, place, and who was present.

[Custody – Modification]

66. State all facts upon which you rely in support of your contention that there has been a change in circumstances since _____ that warrants modification of legal custody awarded by the Court, and **identify** all **persons** with personal knowledge of these facts.

67. State all facts upon which you rely in support of your contention that there has been a change in circumstances since _____ that warrants modification of physical custody awarded by the Court, and **identify** all **persons** with personal knowledge of these facts.

68. State all facts upon which you rely in support of your contention that there has been a change in circumstances since _____ that warrants modification of visitation/access awarded by the Court, and **identify** all **persons** with personal knowledge of these facts.

69. State all facts upon which you rely to support your contention that modification of the Court ordered legal custody/physical custody/access is in the minor child(ren)'s best interest, and **identify** all **persons** with personal knowledge of these facts.

70. If you contend that [Plaintiff/Defendant] has denied you access to the minor

child(ren) in any way since _____, state the date you were denied access by [Plaintiff/Defendant], state what access you requested and how [Plaintiff/Defendant] responded, and **identify** all **persons** with personal knowledge of these facts.

[Use and Possession]

71. If you contend that the residence at (Address) is not the "family home" as defined by Section 8-201(c) of the Family Law Article, state the facts upon which you base said contention.

72. If you claim that any tangible personal property located at the "family home" is not "family use personal property" as defined by the Section 8-201(d) of the Family Law Article, state the facts upon which you base said contention.

73. If you claim that any automobile being used by either you or your spouse is not "family use personal property" as defined by Section 8-201(d) of the Family Law Article, state the facts upon which you base said contention.

74. State all facts upon which you rely in support of your contention, if any, that the court should award you the sole possession and use of the family home and family use personal property.

75. If you contend that the child does not have a need to continue to reside with your spouse in the family home in the State of Maryland, state the facts upon which you base said contention.

[Custody - Out of State Removal]

76. With respect to your proposed move from the Maryland-Washington, D.C. Metropolitan Area, please state: (a) the date you intend to move and the place to which you intend to move; (b) where you intend to reside, including in your answer the names

and ages of all persons who will reside at such residence, the number of bedrooms, the number of bathrooms and the size of the yard; (c) the child-care plan which you would provide to your minor children during periods of time she may be with you, stating the names, ages and qualifications of all persons who would care for her, the hours during which you would utilize their services, the cost of such services, and the location where they would care for her; (d) the facts, circumstances and reasons for such move; (e) a detailed and specific visitation schedule to which you believe you and any other person(s) should be entitled if Plaintiff is awarded custody, and a schedule to which you believe Plaintiff should be entitled if you are awarded custody.

[Custody - Complaint Allegations]

77. State all facts upon which you rely in support of your allegation in Paragraph (#) of your (Name of Pleading) that _____.

78. State all facts upon which you rely in support of your allegation in Paragraph (#) of your (Name of Pleading) that you have been the parent who has provided your child's religious upbringing including, without limitation, a detailed description of your involvement in the (Type) faith during the past five years including, without limitation, the dates, place and occasion of each instance of church/synagogue attendance by you during said period.

[Health Insurance Coverage; Extraordinary Medical Expenses]

79. If you have health insurance, **identify** the insurer, the policy number, the State in which the policy was written, who are covered under the plan, the actual cost to you of your coverage, the actual cost to you of including the child(ren) in such coverage, and describe the coverage provided.

80. If you contend that any child has extraordinary medical expenses, i.e., uninsured expenses over \$100 a year for a single illness or condition including, without limitation, uninsured, reasonable, and necessary costs for orthodontia, dental treatment, asthma treatment, physical therapy, treatment for any chronic health problem, and professional counseling or psychiatric therapy for diagnosed mental disorders, **identify** the child's illness or condition, **identify** all **persons** providing any diagnosis, treatment, therapy or counseling for the child, the amount of the extraordinary medical expenses for each illness or condition incurred in each of the past three calendar years, and the current calendar year, and the anticipated future uninsured costs.

[School Expenses]

81. If you contend that there are expenses incurred or which may need to be incurred on behalf of any child for attending a special or private elementary or secondary school to meet the particular educational needs of the child, state all facts upon which you rely in support of your contention including in your answer **identification** of the school, the nature and amount of such expenses, the child's particular educational needs, and the reasons that a public school is not able to meet the child's particular educational needs.

[Child Support Guidelines – Deviation/Departure]

52. If you contend that application of the child support guidelines would be unjust or inappropriate in this case, please state all facts upon which you rely in support of your contention.

[Prenuptial Agreement]

83. Describe in detail the circumstances surrounding the preparation and execution of a certain "Pre Nuptial Agreement" dated (Date) to which you are a party,

including in your answer the date and substance of any and all discussions you had with [Plaintiff/Defendant] concerning the terms of the Agreement, the date and nature of any and all services performed by [Name of attorney], Esquire in connection with the Agreement including the date and substance of any and all advice, explanations or other communications between either or both parties and said attorney, whether said attorney represented either or both parties in connection with the agreement, the cost of said attorney's services, and the date, amount and person who paid for said attorney's services.

[Alleged Agreements]

84. If you claim that an agreement exists between you and the Plaintiff concerning support, the division of assets, or any other matter, state: (a) the terms and date thereof; (b) Whether oral or in writing; (c) If either of you agreed to pay certain amounts, how such amounts were to be calculated; (d) whether you divided any assets and, if so, what assets each of you obtained; (e) whether the Plaintiff has ever contested the existence of such Agreement and, if so, when she did so.

[Child Support Modification]

85. Itemize the income you have received from any and all sources for each calendar year (Year) through (Year), including in your answer the sources of such income and the amounts received from each such source each year.

86. Please itemize the amounts you spend on a monthly basis for all living expense and itemize all liabilities.

87. Please itemize the amounts you spent on a monthly basis for all living expenses at the time of your divorce, and itemize all liabilities you had at that time.

88. State what amount you contend should be paid by you for the support of

your children, and all facts upon which you rely in support of your contention.

89. Describe in detail any and all differences between your current financial circumstances and your financial circumstances at the time of your divorce, including in your answer any changes in your income, expenses, assets, and liabilities.

90. If you contend that there has not been any material change in circumstances since the date of your divorce and that the Plaintiff/Defendant is not entitled to an increased award of child support, then state all facts upon which you rely in support of your contention.

91. If you contend that the children's expenses as set forth on the Plaintiff's/Defendant's financial statement dated (Date) are inaccurate or unreasonable, state all facts upon which you base your contention, and describe in detail what amounts you believe to be reasonable expenses for your children with respect to each category of expense.

(Attorney's name)
Attorney for [Plaintiff/Defendant]
(Address)
(Phone No.)

**[NOTE: A LINE CERTIFYING SERVICE OF DISCOVERY MATERIAL
MUST BE FILED AND A COPY MUST BE SERVED]**