

SEPARATION AND DIVORCE

1. During the course of your marriage to the plaintiff (or, insert the relevant time period), did you engage or participate in any act or conduct involving intimate sexual relations or intercourse with anyone other than the plaintiff?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
 - a. The date and frequency,
 - b. The place,
 - c. The identification of each person involved by name and last known address,
 - d. A description of each act or conduct, and
 - e. An explanation of any reason, cause or justification for violating your marriage vows.
3. Please state as to each and every witness known to you to have seen, heard, or known about any act or conduct involving intimate sexual relations or intercourse with any one other than the plaintiff:
 - a. The name, address and physical description of each,
 - b. The location where each witness was at the time he or she saw, heard, or learned about any alleged act or conduct,
 - c. The substance, as best you can give it, of all information or knowledge known to each such witness, and
 - d. Whether or not each such witness gave any statement or account, either oral or in writing, of his or her knowledge, and if so, give the substance of the same.
4. Do you deny that during the course of your marriage to the plaintiff you engaged or participated in any intimate sexual relations or intercourse with anyone other than the plaintiff?
5. If your answer to the preceding interrogatory is in the affirmative, please state the factual basis for your denial.
6. Has the defendant caused or inflicted any physical abuse, including any hitting, shaking, grabbing, forcibly holding or striking, on the plaintiff within the past (insert relevant time period) years?
7. If your answer to the preceding interrogatory is in the negative, please describe what happened or occurred by and between the defendant and the plaintiff on (insert date and time) at (insert place) relating in anyway to any physical abuse of the plaintiff by the defendant.
8. If your answer to interrogatory number 6 is in the affirmative, please state as to each act or occurrence of physical abuse of the plaintiff by the defendant:
 - a. A description of each such act or occurrence,
 - b. The number of blows or other aggressive actions,
 - c. The object or thing used by the defendant to strike the plaintiff,
 - d. The result of any hitting, including any injury or verbal suffering to the plaintiff,
 - e. The date and time of each such act or occurrence, and
 - f. The location of each such act or occurrence.

9. During the past three years, have you engaged in or committed any of the following acts or conduct which the plaintiff contends have had the effect of embarrassing or humiliating him or her:
- Criticizing the plaintiff when others have been present,
 - Making scenes, such as (insert facts), in public,
 - Failing to provide the plaintiff with sufficient money to pay his or her bills, thereby causing credit problems,
 - Accusing the plaintiff of infidelity in public,
 - Unwillingness to have children,
 - Conducting loud arguments or disputes that have disturbed others,
 - Following or stalking the plaintiff,
 - Interfering with the plaintiff at his or her work,
 - Interfering with the plaintiff when he or she has been engaged in activities with friends,
 - Intoxicated public behavior,
 - Displaying public behavior that has been out of control,
 - Spreading unkind or vicious rumors, and
 - Making fun of the plaintiff in public.
10. If your answer to any part of the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
- The date,
 - The place,
 - A description of each such act or conduct,
 - An explanation, cause or reason for each such act or conduct,
 - Whether you were ever aware that any such act or conduct of yours had the effect of embarrassing or humiliating the plaintiff, and
 - What steps, if any, you took to avoid repeating any such act or conduct after talking to the plaintiff.
11. Within the past three years, did you intentionally abandon the plaintiff or leave him or her with the intention of not returning?
12. If your answer to the preceding interrogatory is in the affirmative, please state as to each abandonment or leaving of the plaintiff:
- Each date,
 - A description of the circumstances and conditions present between you and the plaintiff at each such time,
 - Each date when you returned or attempted to return, and
 - The length of time in days when you were no longer with the plaintiff during each such abandonment or leave.
13. Within the past three years, has your marriage with the plaintiff developed any problem, difficulty or cause for concern by you in any of the following areas:
- Failure to communicate,
 - Lack of common interests,

- c. Habitual drunkenness,
- d. Drug abuse,
- e. Failure to support,
- f. Refusal of sexual relationship,
- g. Attempts made to repair marital relationship, and
- h. Your refusal of plaintiff's efforts to reconcile.

14. If any part of your answer to the preceding interrogatory is in the affirmative, please state as to each such problem, difficulty or cause for concern:

- a. Each date,
- b. A description of each such problem, difficulty or cause for concern,
- c. The cause of each such problem, difficulty or cause for concern,
- d. Each effort on your part to improve or correct each such problem, difficulty or cause for concern, and
- e. The identification, giving names and last known addresses, of all those persons involved in each such problem, difficulty or cause for concern.

15. Within the past three years, have you been involved in any act of homosexuality?

16. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act:

- a. Each date and place,
- b. The identification, including name and last known address, of each person involved in each such act, and
- c. A description of each such act.

17. If your answer to interrogatory number 15 is in the negative, please state the factual basis for your denial.

18. Within the past three years, have you been involved in any act of bisexuality?

19. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act:

- a. Each date and place,
- b. The identification, including name and last known address, of each person involved in each such act, and
- c. A description of each such act.

20. If your answer to interrogatory number 18 is in the negative, please state the factual basis for your denial.

21. Within the past three years, have you made any unreasonable demand on the plaintiff for intimate sexual activity or sexual intercourse?

22. If your answer to the preceding interrogatory is in the affirmative, please state as to each such demand:

- a. Each date and place,
- b. The identification of the particular intimate sexual activity or sexual intercourse involved in each demand, and
- c. A description of each such demand.

23. If your answer to interrogatory number 21 is in the negative, please state the factual basis for your denial.
24. Have you ever had or suffered from any mental illness, nervous breakdown or insanity?
25. If your answer to the preceding interrogatory is in the affirmative, please state as to any such mental illness, nervous breakdown or insanity:
 - a. The nature and extent of each,
 - b. The inclusive dates of any such diagnosis and treatment,
 - c. The name and address of each health care professional who diagnosed you and treated you,
 - d. A description of your course of treatment for each, identifying physicians, hospitals and drugs,
 - e. Each manifestation and appearance of each such illness, breakdown and insanity, and
 - f. Each effect of each such illness, breakdown and insanity on your marriage to the plaintiff.
26. If your answer to interrogatory number 24 is in the negative, please state the factual basis for your denial.
27. If it is your allegation or contention that the legal defense of collusion is applicable to the plaintiff's cause of action in this case, please state the factual basis on which you believe that such defense is applicable.
28. If it is your allegation or contention that the legal defense of recrimination is applicable to the plaintiff's cause of action in this case, please state the factual basis on which you believe that such defense is applicable.
29. If it is your allegation or contention that the legal defense of plaintiff's condonation is applicable to the plaintiff's cause of action in this case, please state the factual basis on which you believe that such defense is applicable.
30. If it is your allegation or contention that the legal defense of connivance is applicable to the plaintiff's cause of action in this case, please state the factual basis on which you believe that such defense is applicable.
31. If it is your allegation or contention that the legal defense of provocation is applicable to the plaintiff's cause of action in this case, please state the factual basis on which you believe that such defense is applicable.

Mental Abuse.

1. During the past three years, did you, by any act or conduct, refuse or deny any request or expectation by the plaintiff for sexual intercourse?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
 - a. Each date of any refusal or denial,
 - b. Each method or means used by you to refuse or deny sexual intercourse to the plaintiff, and
 - c. Each reason, cause or explanation of any refusal or denial.
3. Please state the most recent date when you had sexual intercourse with the plaintiff?
4. Please state the circumstances of your most recent sexual intercourse with the plaintiff?

5. Please state the most recent date when you were approached or contacted by the plaintiff with a request for sexual intercourse?
6. Prior to the date when you most recently had sexual intercourse with the plaintiff, what was the usual or regular time in days of the frequency of your sexual activity or sexual intercourse with the plaintiff over the previous year?
7. Over the most recent three years, how often did you and the plaintiff fail to engage in sexual activity or sexual intercourse on the basis of the usual or regular frequency set forth in your response to the preceding interrogatory?
8. Within the past three years, have there been any extended time periods longer than a week during which you have not had any sexual intercourse with the plaintiff?
9. If your answer to the preceding interrogatory is in the affirmative, please state as to each such extended time period of more than a week:
 - a. The inclusive dates of each such period,
 - b. The frequency of such periods,
 - c. Each reason, cause or explanation for any lack of sexual intercourse during each such period, and
 - d. Whether you had sexual intimacy, relations or intercourse with any other person during any such period, and if so, give details.
10. During the past three years, have you unreasonably denied or refused any request or expectation by the plaintiff for sexual activity or sexual intercourse?
11. If your answer to the preceding interrogatory is in the affirmative, please explain each such denial or refusal.
12. During the past three years, have you engaged in or committed any of the following acts or conduct which the plaintiff contends have had the effect of embarrassing or humiliating him or her:
 - a. Criticizing the plaintiff when others have been present,
 - b. Making scenes, such as (insert facts), in public,
 - c. Failing to provide the plaintiff with sufficient money to pay his or her bills, thereby causing credit problems,
 - d. Accusing the plaintiff of infidelity in public,
 - e. Unwillingness to have children,
 - f. Conducting loud arguments or disputes that have disturbed others,
 - g. Following or stalking the plaintiff,
 - h. Interfering with the plaintiff at his or her work,
 - i. Interfering with the plaintiff when he or she has been engaged in activities with friends,
 - j. Intoxicated public behavior,
 - k. Displaying public behavior that has been out of control,
 - l. Spreading unkind or vicious rumors, and
 - m. Making fun of the plaintiff in public.
13. If your answer to any part of the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
 - a. The date,
 - b. The place,

- c. A description of each such act or conduct,
 - d. An explanation, cause or reason for each such act or conduct,
 - e. Whether you were ever aware that any such act or conduct of yours had the effect of embarrassing or humiliating the plaintiff, and
 - f. What steps, if any, you took to avoid repeating any such act or conduct after talking to the plaintiff.
14. During the past three years, have you and the plaintiff engaged in or carried on any fight, dispute or encounter where you have each expressed differences of opinion on various subject matters?
15. If your answer to the preceding interrogatory is in the affirmative, please state as to each act or conduct of each such fight, dispute or encounter:
- a. The date,
 - b. The place,
 - c. The subject matter, indicating a summary of your position and that of the plaintiff on each subject matter,
 - d. A description of your acts and conduct on each subject matter,
 - e. A description of the plaintiff's acts and conduct on each subject matter,
 - f. A description of each such fight, dispute or encounter,
 - g. The frequency with which you and the plaintiff engaged in some kind of fight, dispute or encounter,
 - h. A description of any physical acts or conduct by you toward or against the plaintiff,
 - i. A description of any physical acts or conduct by the plaintiff toward or against you,
 - j. A description of any verbal acts or conduct by you toward or against the plaintiff, including any degrading comments and names,
 - k. A description of any verbal acts or conduct by the plaintiff toward or against you, including any degrading comments and names,
 - l. Each reason, cause or explanation for each act or conduct by you for any such fight, dispute or encounter, and
 - m. A description of any circumstances or conduct on the part of the plaintiff which caused or provoked any acts or conduct by you.
16. During the past three years, have you engaged in or been involved in any act or conduct toward the plaintiff which has resulted in so-called "Silent Treatment" or a deliberate refusal on your part to verbally respond to statements or conversation of the plaintiff?
17. If your answer to the preceding interrogatory is in the affirmative, please state as to each act or conduct on your part:
- a. The inclusive dates of each period during which you refused to verbally respond,
 - b. A description of your acts or conduct relating to your "silent treatment,"
 - c. The length of time in days and hours of your silence on each occasion,
 - d. Any reason, cause or explanation for your silence, and
 - e. Your response to any plaintiff's request that you talk.

18. During the past three years, have you ever removed or caused the removal of property treasured by the plaintiff?
19. If your answer to the preceding interrogatory is in the affirmative, please state as to each act or conduct of yours relating to the removal of property:
- The date,
 - The factual circumstances involved in any such removal,
 - A description of the property involved, and
 - Any reason, cause or explanation for any such removal.
20. During the past three years, have you ever destroyed or caused the destruction of property treasured by the plaintiff?
21. If your answer to the preceding interrogatory is in the affirmative, please state as to each act or conduct of yours relating to the destruction of property:
- The date,
 - The factual circumstances involved in any such destruction,
 - A description of the property involved, and
 - Any reason, cause or explanation for any such destruction.
22. During the past three years, has your conduct included any act of unkindness against any friend of the plaintiff?
23. If your answer to the preceding interrogatory is in the affirmative, please state as to each act of yours:
- The date,
 - The factual circumstances involved in any such unkind act,
 - A description of each such act, and
 - Any reason, cause or explanation for any such act of unkindness.
24. During the past three years, has your conduct included any act of unkindness against the plaintiff's family?
25. If your answer to the preceding interrogatory is in the affirmative, please state as to each act of yours:
- The date,
 - The factual circumstances involved in any such unkind act, and
 - Any reason, cause or explanation for any such act of unkindness.
26. During the past three years, have there been times when you had a condition of impotence, including your inability to achieve or maintain an erection?
27. If your answer to the preceding interrogatory is in the affirmative, please state as to each time of your impotence:
- The date,
 - A description of your condition,
 - The impact of your condition on your sexual activities with the plaintiff, and
 - The cause of your condition.

28. If your condition of impotence was caused by or related to any medical problem which you had, please state:
- A description of your medical problem,
 - How such problem was determined,
 - Identify any health care professional by name and address who saw or treated you for such condition,
 - The dates, kind and type of each medical treatment which you received for any such condition, and
 - Whether any such condition was caused by or related to your use of any alcoholic drink or any drug, and if so, give details.
29. If your condition of impotence was caused by or related to any mental or psychological problem which you had, please state:
- A description of your mental or psychological problem,
 - How such problem was determined,
 - Identify any health care professional by name and address who saw or treated you for such condition,
 - The date, kind and type of each treatment which you received for any such condition, and
 - Whether any such condition was caused by or related to your use of any alcoholic drink or any drug, and if so, give details.
30. Are you married at the present time?
31. If the answer to the preceding interrogatory is in the affirmative, please state as to your present marriage:
- The date and place where you were married,
 - The full name of your spouse (including maiden name), and
 - Whether your spouse is now living with you.
32. Please state whether or not your spouse is now living with you.
33. If the answer to the preceding interrogatory is in the negative, please state:
- The approximate date of separation, and
 - The present address of your spouse.
34. Were you ever married prior to your present marriage?
35. If the answer to the preceding interrogatory is in the affirmative, please state for each previous marriage and each previous spouse:
- The full name of each spouse,
 - The present address of each such spouse,
 - The date of commencement of each such marriage,
 - The date of termination of each such marriage, and
 - The cause or manner of termination of each such marriage.

36. Was any marriage previous to your present marriage terminated by divorce?
37. If the answer to the preceding interrogatory is in the affirmative, please state:
- The full name of the spouse from which you were divorced,
 - The state and county where any such divorce was decreed,
 - The date of any such divorce, and
 - The grounds of any such divorce decree.
38. Is it your belief that your divorce from any prior marriage is legally binding on you and on your marriage to the plaintiff?
39. If your answer to the preceding interrogatory is in the affirmative, please state:
- The date and place of such divorce,
 - The court, giving name and address, having jurisdiction of such divorce,
 - The terms and condition of any court decree of divorce, and
 - Each reason supporting your belief that your divorce from any prior marriage is legally binding.
40. Are you currently providing any financial support for any spouse by reason of a prior marriage?
41. If your answer to the preceding interrogatory is in the affirmative, please state:
- The identity, including name and address of any such spouse,
 - The amount of any such financial support,
 - The court, including name and address, ordering any such financial support, and
 - The terms and conditions of any such court order for support.
42. Please identify yourself fully, giving your full name and the names and ages in full of your natural children, stepchildren, foster children, and adopted children.
43. Please identify yourself fully giving your full name and the full name of your present spouse.
44. Do you have any natural children?
45. If the answer to the preceding interrogatory is in the affirmative, please state:
- The full name of each natural child,
 - The present age of each natural child, and
 - Which of such natural children presently reside with you.
46. Do you have natural children by more than one spouse?
47. If the answer to the preceding interrogatory is in the affirmative, please state:
- The full name of each spouse, and
 - Which spouse in the natural parent to each child.
48. Do you have any stepchildren?
49. If the answer to the preceding interrogatory is in the affirmative, please state:
- The full name of each stepchild,
 - The present age of each stepchild,

- c. The names in full of the natural parents of each stepchild, and
- d. Which of such stepchildren currently reside with you.

50. Do you have any foster children?

51. If the answer to the preceding interrogatory is in the affirmative, please state:

- a. The full name of each foster child,
- b. The present age of each foster child,
- c. The names in full of the natural parents of each foster child, and
- d. The date when each foster child was put into your home.

52. Do you have any adopted children?

53. If the answer to the preceding interrogatory is in the affirmative, please state:

- a. The full present name of each adopted child,
- b. The present age of each adopted child,
- c. The date on which you became a parent to each adopted child,
- d. The place where, or agency through which, each child was adopted,
- e. The name of spouse in full with whom each child was adopted, and
- f. Which of such adopted children presently reside with you.

54. Do any of your children no longer reside with you?

55. If the answer to the preceding interrogatory is in the affirmative, please state:

- a. The name in full and age of each child,
- b. The present residence address of each child in full, giving number, street, city or town, state, and telephone number,
- c. The occupation of each child, including present business address, giving name, number, street, city or town, state, and telephone number, and
- d. The marital status of each child, giving the full name of the present spouse.

56. Please set forth fully and completely a history and biography of your physical and mental condition for the past five years, describing in detail any injuries, ailments, operations, or illnesses suffered by you during that period.

57. Within the past five years have you undergone or received any treatment for any mental or emotional disturbance?

58. If your answer to the preceding interrogatory is in the affirmative, please state as to any such treatment for each such mental or emotional disturbance:

- a. The nature and extent of any such treatment,
- b. The dates of any such treatment,
- c. The location or place of any such treatment, and
- d. The name and address of any doctor or hospital involved in any such treatment.

59. Within the past three years, have you undergone or received any psychiatric treatment?

60. If your answer to the preceding interrogatory is in the affirmative, please state:

- a. The nature and extent of any such treatment,

- b. The dates of any such treatment, and
 - c. The name and address of any doctor or practitioner treating you.
61. Within the past three years have you undergone or had any mental or emotional disturbance?
62. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The nature and extent of any such mental or emotional disturbance,
 - b. The date or dates of any such mental or emotional disturbance, and
 - c. The name and address of any doctor or practitioner, or hospital or other institution, involved in any way in any examination, treatment or care for any such mental or emotional disturbance.
63. Have you ever had any form of mental illness, nervous breakdown, fits, convulsion, fainting spells, epilepsy, venereal disease, or tuberculosis?
64. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The date of each occurrence, and
 - b. The name and address of any doctor, practitioner, hospital, or other institution treating you for any such condition.
65. Please describe in as much detail as possible any and all changes in your personality, attitudes, manner, state of mind and emotional state as a result of any prior existing injury, illness, or disability.
66. Please describe in as much detail as possible any and all changes in your appearance, facial expression, speaking ability, hearing ability, or mobility as a result of any prior existing injury, illness, or disability.
67. Please describe in complete detail all injuries, illnesses and disabilities that you received or suffered from within the past five years stating in your answer the parts of your body so affected; the severity of such injuries, ailments, or pains; and how long each lasted.
68. If, as a result of any prior existing illness, injury or disability, you are suffering any present or permanent injuries, ailments, or pains, please describe the same fully, stating their nature, extent, and location.
69. As a result of any prior existing illness, injury or disability, how long and between what dates were you:
- a. Wholly confined to bed,
 - b. Wholly confined to the house, and
 - c. Wholly incapacitated from your normal activities, giving particulars as to each activity from which you were so incapacitated.
70. Please describe the nature and extent of the medical or hospital treatment which you received as a result of any prior existing illness, injury or disability, stating in each case the dates thereof and the names and addresses of the physicians or hospitals involved.
71. With respect to any and all prior existing injuries, illnesses, or disabilities, please state:
- a. A full and complete description of each such injury, illness, or disability,
 - b. The date and time when each such injury, illness, or disability first manifested itself, and

- c. Whether or not you have now fully recovered therefrom, giving the approximate date upon which recovery was complete, or, if not complete, the approximate date when it is contemplated that recovery will be complete.
72. If you have recovered from the effects of all prior existing injuries, illnesses or disabilities, please give the date on which you were fully recovered.
73. If you have not recovered from the effects of all prior existing injuries, illnesses or disabilities, please describe in complete detail all your present injuries, pains, disabilities, signs and symptoms.
74. Please state the inclusive dates when, as a result of any prior existing injury, illness, or disability you were:
- a. Totally disabled from your normal activities, and
- b. Partially disabled from your normal activities.
75. During the period of total disability as a result of any prior existing injury, illness, or disability, please itemize each and every activity as to which you were totally disabled, giving the inclusive dates of such disability as to each and every activity.
76. During the period of partial disability as a result of any prior existing injury, illness, or disability, please itemize each and every activity as to which you were partially disabled, giving the inclusive dates of such disability as to each and every activity.
77. If, as a result of any prior existing injury, illness, or disability you were necessarily and completely confined to your home or any place other than a hospital, clinic, or other institution, please state:
- a. The address and name or other designation of any such place where you were so confined,
- b. Whether you were confined to bed or simply to the premises, and
- c. The period, giving inclusive dates, of any such confinement.
78. Are you still afflicted with or suffering from the effects of any prior existing injury, illness or disability?
79. If your answer to the preceding interrogatory is in the affirmative, please describe in complete detail the nature, extent and duration of each and everyone of such injuries, illnesses, pains, disabilities, signs and symptoms.
80. If, as a result of any prior existing injury, illness, or disability, you received any presently existing or permanent injuries, ailments or pains, please describe the same fully, stating their nature, extent, and location.
81. If you believe that you have any permanent injuries as a result of any prior existing injury, illness, or disability, please describe such permanent injuries in detail insofar as you are able to do so.
82. Are you presently receiving treatment or care for any medical condition involving any prior existing injury, illness or disability?
83. If your answer to the preceding interrogatory is in the affirmative, please state with respect to any diagnosis of any such medical condition:
- a. A full description of each such diagnosis,
- b. The date on which each such diagnosis was made, and
- c. The name and address of each doctor making each such diagnosis.

84. If any prognosis has been made concerning any condition which you presently have as a result of any prior existing injury, illness, or disability, please state:
- a. A full description of each such prognosis which is known to you,
 - b. The date on which each such prognosis was made, and
 - c. The name and address of each doctor making each such prognosis.
85. If the general physical or mental condition of your health during each of the past five years has been other than normal in any particular, describe the details thereof.
86. Please describe fully and in complete detail any illnesses, injuries, diseases, defects, or operations which you may have had or suffered from:
- a. Within two years prior to the date of the alleged occurrence, and
 - b. At any time after the date of the alleged occurrence, not caused or arising from the same, setting forth the dates upon which each of the above was had or suffered from.