Physical Abuse.

Definitions

As used in these interrogatories, the words "occurrence" or "alleged occurrence" shall mean any physical abuse, including any hitting, shaking, grabbing, forcibly holding or striking of the plaintiff by the defendant.

1. Has the defendant cause of inflicted any physical abuse, including any hitting, shaking, grabbing, forcibly holding or striking, on the plaintiff within the past (insert relevant time period) years?
2. 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 any way to any physical abuse of the plaintiff by the defendant.
3. If your answer to interrogatory number 1 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 mental 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.

4. Has the defendant caused the plaintiff to be imprisoned, held against his or her will or had his or her voluntary movements limited in any way within the past (insert relevant time period) years?
5. If your answer to interrogatory number 4 is in the negative, please describe what happened or occurred between the defendant and the plaintiff on (insert date and time) at (insert place) relating in any way to any imprisonment of the plaintiff by the defendant.
6. If your answer to interrogatory number 4 is in the affirmative, please state as to each act or occurrence of imprisonment, holding against his or her will or a limitation on his or her voluntary movements, of the plaintiff by the defendant:

    a. A description of each such act or occurrence,
    b. The cause of each act or occurrence,
    c. The result of each act or occurrence,
    d. The date and time of each act or occurrence,
    e. The location of each act or occurrence,
    f. The name and address of each witness to each such act or occurrence, and
    g. A description of all actions and events which led up to any such act or occurrence.

7. Has the defendant committed any marital rape, including any forced or involuntary sexual intercourse of the plaintiff by the defendant, within the past (insert relevant time period) years?

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8. 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 any way to any marital rape of the plaintiff by the defendant.
9. If your answer to the interrogatory number 7 is in the affirmative, please state as to each occurrence of marital rape of the plaintiff by the defendant:

    a. A description of the actions and conduct of both the defendant and the plaintiff relating in any way to any such marital rape,
    b. The result of any such marital rape including any injury to the plaintiff or mental suffering by the plaintiff,
    c. The date and time of each such act or occurrence,
    d. The location of each such act or occurrence,
    e. The cause of each such marital rape,
    f. A description of all actions and events which led up to each such act or occurrence,
    g. The name and address of each witness to each such occurrence,
    h. A description of all actions and events which led up to any such act or occurrence, and
    i. The cause of each such act or occurrence.

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10. Please give a full and complete account of any threats or threatening gestures made just prior to the alleged occurrence, stating as to each:

    a. Of what it consisted,
    b. By whom it was made, and
    c. To whom it was directed.

11. Please state in complete detail any attempt you made to inflict physical harm upon the plaintiff at the time of the alleged occurrence.
12. Please state each and every act or action taken by you or by any agent or employee of which caused or contributed to the alleged occurrence.
13. Please state each and every act or action taken by you or by any agent or employee of you which was related in any way to the alleged occurrence.
14. Please state in detail everything you or any agent or employee of you did from the time the other party was first seen up to the time of the alleged occurrence.
15. Please state in complete detail the substance of any communication, including words and gestures, that you or any agent or employee of you conveyed to the other party at the time of the alleged occurrence.
16. Please give a full and complete account of any threats or threatening gestures made just prior to the alleged occurrence, stating as to each:

    a. Of what it consisted,
    b. By whom it was made, and
    c. To whom it was directed.

17. Please state when the alleged occurrence happened, giving the date, hour, and minute as nearly as possible.

18. Please state as accurately as you are able the date and the time of the alleged occurrence.
19. Please state when the alleged occurrence took place, giving the date, hour, and minute as nearly as possible.
20. Please state as accurately as you can, the time when the alleged occurrence happened, giving the date, hour and minute as nearly as possible.
21. Please state the time of the alleged occurrence as accurately as you can, giving the year, month, day, hour, and minute.
22. Please state as accurately as you can when the alleged occurrence happened, giving the date, hour and minute as nearly as possible.
23. Please describe fully and in complete detail all events which occurred from one hour before the alleged occurrence until the occurrence, and please describe such events in sequential order.
24. Please describe fully and in complete detail everything you saw from one minute prior to the alleged occurrence until the occurrence.
25. Please describe fully and in complete detail everything you heard from one minute prior to the alleged occurrence until the occurrence.
26. Please describe fully and in complete detail everything you smelled from one minute prior to the alleged occurrence until the occurrence.
27. Please describe fully and in complete detail everything you felt from one minute prior to the alleged occurrence until the occurrence.
28. Please describe fully and in complete detail everything you did from one minute prior to the alleged occurrence until the occurrence.
29. Please describe fully and in complete detail the exact time when you became aware of the alleged occurrence, and how you became aware of the occurrence.
30. Please state exactly where the occurrence happened, including names of cities or towns, names and numbers of streets, and other named or readily identifiable landmarks, buildings or fixed objects.
31. Please describe the general neighborhood at the place where the alleged occurrence happened, stating in your answer whether it was a residential or business district, and whether it was sparsely or thickly settled.
32. Please state when the alleged occurrence happened, giving the date, hour and minute as nearly as possible.
33. Please describe fully and completely how the alleged occurrence happened, stating in your answer all events relating thereto in their sequential order.
34. Please describe in detail any action taken by you, or any other person which resulted in physical abuse, including contact with, impact with or the striking of the plaintiff, stating:

    a. Identity of the person causing each such physical abuse,
    b. A description of the physical abuse, and
    c. The exact time of each such physical abuse.

35. Please describe everything which you did in an attempt to avoid the alleged occurrence.
36. Please state each and every act or action taken by you which caused or contributed to cause the alleged occurrence.
37. Please state each and every act or action taken by you which was related in any way to the alleged occurrence.
38. Please state in detail everything you saw or heard the plaintiff do:

    a. Up to and including the alleged occurrence, and

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b. After the alleged occurrence until the plaintiff left the scene of the occurrence.

39. Is it the contention or allegation of the defendant that the plaintiff by any act or omission caused or contributed to cause the plaintiff's alleged physical abuse?
40. If your answer to the preceding interrogatory is in the affirmative, please state in detail each act or omission by the plaintiff which it is contended or alleged caused or contributed to cause the plaintiff's alleged physical abuse.
41. Please state, from any observations made by you immediately after the alleged occurrence, whether the plaintiff appeared to have been physically injured or whether the plaintiff appeared to have been mentally or emotionally disturbed as a result of the alleged occurrence.
42. If your answer to the preceding interrogatory is in the affirmative, please describe in complete detail the appearance of the plaintiff immediately after the alleged occurrence, particularly with regard to the following:

    a. The physical condition of the plaintiff, including in your answer any signs of bleeding, bruises, cuts or other physical injury,
    b. The emotional or mental condition of the plaintiff, including in your answer whether or not the plaintiff was crying, talking, complaining of pain or otherwise appeared mentally disturbed, and
    c. The appearance of the clothing of the plaintiff, as to whether or not any part of it was disarranged, torn, dirty or otherwise, indicating which and to what extent.

43. Please state whether or not you rendered any help or assistance of any kind to the plaintiff immediately after the alleged occurrence.
44. If your answer to the preceding interrogatory is in the affirmative, please give:

    a. A full and complete description of what help or assistance was rendered, and
    b. The identification, including physical appearance and name and address, of each person who rendered any such help or assistance to the plaintiff.

45. Please state whether or not you referred the plaintiff to a doctor or other medical assistance immediately after the alleged occurrence.
46. If your answer to the preceding interrogatory is in the affirmative, please state the name and address of each doctor or medical person to whom the plaintiff was referred.
47. Please describe in detail any and all conversations, sounds, words, utterances, speech or noises made by the plaintiff after the alleged occurrence, which were heard by you.
48. Was the plaintiff unconscious at any time after the time of the alleged occurrence?
49. If your answer to the preceding interrogatory is in the affirmative, please state:

    a. The exact date, hour and minute when the plaintiff became unconscious,
    b. The duration of time in hours and minutes during which the plaintiff was unconscious,
    c. The date, hour and minute when the plaintiff regained consciousness, and
    d. The duration of time in hours and minutes during which the plaintiff was conscious.

50. Please describe in detail all acts, actions, activities or movements done or made by the plaintiff after the alleged occurrence which were seen by you.

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51. At any time after the alleged occurrence did you have any conversation or communication with the plaintiff in any manner in regard to the happening of the alleged occurrence?
52. If your answer to the preceding interrogatory is in the affirmative, please give in as much detail as possible:

    a. The words or substance of any such conversation or communication,
    b. The dates of such conversation or communication, setting forth the approximate time of day on any of the aforesaid dates,
    c. The place or places where such conversation or communication occurred, and
    d. The names and addresses of each and every person who was present at the time of any such conversation or communication.

53. Please state all facts on which you rely as tending to show any negligence or assumption of risk of any kind on the part of the plaintiff.
54. Did the plaintiff ever make any statement or give any account, either oral or written, of the alleged occurrence to you?
55. If your answer to the preceding interrogatory is in the affirmative, please state:

    a. The date of each such statement or account,
    b. The name and address of the person to whom such statement or account was given,
    c. The name and address of each and every person present at the time each such statement or account was given, and
    d. The contents or substance of each such statement or account in as much detail as possible.

56. Please state carefully and in detail everything you saw and everything you did during the periods immediately preceding and immediately following the alleged occurrence.
57. Please state everything you saw the plaintiff do up to the moment of contact, describing such plaintiff's entire conduct and action in detail.
58. Please describe the actions and activities of the plaintiff from the time of contact until the plaintiff was completely out of your view.
59. Please give a full and complete account of any threat or threatening gesture made just prior to the alleged occurrence, stating as to each:

    a. Of what it consisted,
    b. By whom it was made, and
    c. To whom it was directed.

60. State in detail exactly what you claim the plaintiff did prior to the time of the alleged occurrence.
61. Please state everything you saw the plaintiff do which had any bearing on the alleged occurrence.
62. Do you claim or contend that the plaintiff engaged in any action or activity which caused or contributed to cause the alleged occurrence?
63. If the answer to the preceding interrogatory is in the affirmative, please state:

    a. A full description of the plaintiff,
    b. A full description of each such action or activity, and

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c. A full explanation of how or in what manner each such action or activity caused or contributed to cause the alleged occurrence.

64. Please give a full and complete account of what you were doing at the precise moment of the occurrence.
65. Please describe, fully and chronologically, all that you did in an attempt to avoid the alleged occurrence.
66. With regard to the position of your body at the moment of the alleged occurrence, please state:

    a. What position your body was in, whether sitting, standing, walking, lying down or otherwise, and
    b. Whether your body was in motion, and if so, describe such motion, including the speed with which such motion was made.

67. Were you alone at the time of the alleged occurrence?
68. If the answer to the preceding interrogatory is in the negative, please identify each and every person who was accompanying you at the time of the occurrence.
69. Were your hands occupied with touching or holding anything at the time of the alleged occurrence?
70. If the answer to the preceding interrogatory is in the affirmative, please:

    a. Give a full and complete description of what you were touching or holding, including in your answer weight, size and shape, and
    b. Describe the manner in which you were touching or holding it, including in your answer whether you were using one or both hands.

71. Were there police officers present at the place of the occurrence before, during or after the alleged occurrence?
72. If the answer to the preceding interrogatory is in the affirmative, please state:

    a. The names, addresses, badge numbers and police units of all such police officers,
    b. The number of such officers present,
    c. The number of police cars present,
    d. The substance of all conversations you had with any such police officer,
    e. All arrests/citations made by any such officer,
    f. All reports known by you to have been filed by any such officer,
    g. The name of the person who called the police, when such call was made, and from where such call was made,
    h. When the police arrived at the scene of the occurrence,
    i. What the police officers did at the scene of the occurrence, and
    j. Whether any photographs were taken by the police.

73. Is it the contention of the defendant that the plaintiff by any act or commission caused or contributed to the alleged occurrence?
74. If the answer to the preceding interrogatory is in the affirmative, please state the basis of this contention and all facts upon which it is based.
75. Is it the contention of the defendant that the plaintiff aggravated or exacerbated plaintiff's injuries by any act or omission?

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76. If the answer to the preceding interrogatory is in the affirmative, please state the factual basis of this contention.
77. Is it the contention of the defendant that a prior medical condition of the plaintiff caused or contributed to cause the plaintiff's injuries?
78. If the answer to the preceding interrogatory is in the affirmative, please state the factual basis of this contention.
79. Immediately after the alleged occurrence, did the defendant observe the plaintiff at or near the scene of the alleged occurrence?
80. If the answer to the preceding interrogatory is in the affirmative, please describe:

    a. The appearance of the plaintiff after the alleged occurrence,
    b. The tone of voice used by the plaintiff after the alleged occurrence, and
    c. The emotional condition of the plaintiff after the alleged occurrence.

Verbal Abuse.

Definitions

The words "occurrence" or "alleged occurrence" as used hereinafter shall mean the verbal abuse, including harsh, negative, defamatory or derogatory language directed by the defendant to the plaintiff.

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1. During the past three years, have you ever, in any private conversation by you with the plaintiff while you were upset or angry with the plaintiff, used vulgar, profane or swearing words in a hostile manner?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

    a. The date and frequency,
    b. The place,
    c. The substance, as best you can recall, of each conversation including who said what to whom,
    d. The loudness and tone of your voice, and
    e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

3. During the past three years, have you ever, in any private conversation by you with the plaintiff while you were upset or angry with the plaintiff, made threats or warnings against the plaintiff in a hostile manner?
4. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

    a. The date and frequency,
    b. The place,
    c. The substance, as best you can recall, of each conversation including who said what to whom,
    d. The loudness and tone of your voice, and
    e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

5. During the past three years, have you ever, in any private conversation by you with the plaintiff while you were upset or angry with the plaintiff, made accusations against the plaintiff in a hostile manner?
6. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

   a. The date and frequency,
   b. The place,
   c. The substance, as best you can recall, of each conversation including who said what to whom,
   d. The loudness and tone of your voice, and
   e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

7. During the past three years, have you ever, in any private conversation by you with the plaintiff while you were upset or angry with the plaintiff, in a hostile manner blamed the plaintiff for his or her conduct.
8. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

   a. The date and frequency,
   b. The place,
   c. The substance, as best you can recall, of each conversation including who said what to whom,
   d. The loudness and tone of your voice, and
   e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

9. During the past three years, have you ever, in any private conversation by you with the plaintiff while you were upset or angry with the plaintiff, made complaints or criticisms against the plaintiff in a hostile manner?
10. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

    a. The date and frequency,
    b. The place,
    c. The substance, as best you can recall, of each conversation including who said what to whom,
    d. The loudness and tone of your voice, and

    e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

11. During the past three years, have you ever failed to stop speaking to the plaintiff in a hostile or aggressive manner after being requested by him or her to do so?
12. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation:

    a. The date,

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b. The place,
c. The substance, as best you can recall, of each such conversation including who said what to whom, and
d. An explanation for any reason, cause, circumstance or justification for your failure to stop speaking when requested by the plaintiff to do so.

13. During the past three years, have you ever, in nonprivate conversation by you with the plaintiff, and other people while you were upset or angry with the plaintiff, used vulgar, profane or swearing words in a hostile manner?
14. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

a. The date and frequency,
b. The place,
c. The substance, as best you can recall, of each conversation including who said what to whom,
d. The loudness and tone of your voice, and
e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

15. During the past three years, have you ever, in any nonprivate conversation by you with the plaintiff and other people while you were upset or angry with the plaintiff, made threats or warnings against the plaintiff in a hostile manner?
16. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

a. The date and frequency,
b. The place,
c. The substance, as best you can recall, of each conversation including who said what to whom,
d. The loudness and tone of your voice, and
e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

17. During the past three years, have you ever, in any nonprivate conversation by you with the plaintiff and other persons while you were upset or angry with the plaintiff, made accusations against the plaintiff in a hostile manner?
18. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

a. The date and frequency,
b. The place,
c. The substance, as best you can recall, of each conversation including who said what to whom,
d. The loudness and tone of your voice, and
e. Explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

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19. During the past three years, have you ever, in any nonprivate conversation by you with the plaintiff and other persons while you were upset or angry with the plaintiff, in a hostile manner blamed the plaintiff for his or her conduct?
20. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

    a. The date and frequency,
    b. The place,
    c. The substance, as best you can recall, of each conversation including who said what to whom,
    d. The loudness and tone of your voice, and
    e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

21. During the past three years, have you ever, in any nonprivate conversation by you with the plaintiff while you were upset or angry with the plaintiff, made complaints or criticisms against the plaintiff in a hostile manner?
22. If your answer to the preceding interrogatory is in the affirmative, please state as to each such conversation you had with the plaintiff:

    a. The date and frequency,
    b. The place,
    c. The substance, as best you can recall, of each conversation including who said what to whom,
    d. The loudness and tone of your voice, and
    e. An explanation for any reason, cause, circumstance or justification for your hostile conversation with the plaintiff.

23. Please describe in full detail how the alleged occurrence took place, giving all events in detail in the order in which they occurred, before, at the time of, or after the occurrence, which had any bearing on the cause and manner of the happening of the occurrence.
24. Please state in complete detail as to each alleged incident:

    a. The date and time of each incident,
    b. The place of each incident,
    c. The physical description of the place where each incident occurred,
    d. All the reasons known to you for which the plaintiff was present in each such place,
    e. All the reasons for which the defendant was present in each such place, and

    f. The physical appearance of the defendant during each such incident, including in your answer the type of clothing worn, what objects, if any, were held by the defendant and all other physical characteristics.

25. Please state fully and in complete detail the exact place(s) where each incident of the alleged occurrence took place, in chronological order, including in your answer:

    a. The address of each such place,
    b. The name and address of the owner of each such place, and

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c. The name and address of the person, firm or corporation in control of each place.

26. Please describe fully all the actions of the defendant.
27. Please describe fully as to each alleged incident:

a. All physical contact between the plaintiff and the defendant,
b. The words of the defendant,
c. The gestures of the defendant,
d. The tone of voice of the defendant, and
e. Whether the encounter with the plaintiff was planned or otherwise.

28. If the exact words cannot be remembered, please give the substance of each conversation or communication with the plaintiff during each alleged incident, indicating whether the defendant swore, threatened violence, made accusations of dishonesty or illegal or immoral behavior, threatened legal proceedings, threatened to reveal information to the plaintiff's employer or neighbors, or spoke in any other abusive or insulting manner.
29. Please describe fully as to each alleged incident, the conduct, conversation and actions of the plaintiff.
30. Please identify and describe the appearance of each and every person who was present at the time of each such incident, including in your answer:

a. The name and address of each such person if known to you,
b. The date(s) on which each such person was present,
c. The location of each such person in reference to the plaintiff and the defendant during the time of each such incident,
d. The reason(s) for each such person being present at that time and place, and
e. The relationship, if any, which exists or existed between each such person and the defendant.

31. Did the plaintiff seem distressed, upset, nervous, shocked, frightened, fearful, humiliated, insulted, angered, or outraged at any time during each alleged incident?
32. If the answer to the preceding interrogatory is in the affirmative, please describe:

a. The exact nature of the plaintiff's mental or emotional state, including the physical manifestations,
b. The time and manner in which the defendant or any agent or employee of the defendant realized that the plaintiff was becoming so affected,
c. All actions taken by the defendant or any agent or employee of the defendant upon gaining such knowledge, and
d. Whether the encounter or contact ended because of this reaction by the plaintiff.

33. Please state in detail the substance of any conversation between you and the plaintiff concerning the alleged occurrence at the place and time of the alleged occurrence.
34. Please give the substance of any and all conversations, communications or statements made by or between the plaintiff and defendant relative to the alleged occurrence.
35. If you had any conversation with the plaintiff at the time of or shortly after the alleged occurrence, please give the substance of any such conversation.

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36. Please state any conversation you had with the plaintiff following the alleged verbal abuse, stating in detail everything you said and everything the plaintiff said to you concerning the alleged verbal abuse.
37. Please state the substance of all conversations that took place:

    a. Between you and the plaintiff concerning the alleged occurrence, and
    b. Between others and the plaintiff in your presence concerning the alleged occurrence.

38. If you had any conversation with the plaintiff concerning the occurrence, please state who was present at each such conversation, the substance and what was said, identifying who said what.
39. Did you ever make or give any statement, oral or written, to anyone regarding the alleged occurrence?
40. If the answer to the preceding interrogatory is in the affirmative, please state:

    a. The name and address of each person to whom you made or gave any such statement,
    b. The date of each such statement,
    c. The form of each such statement, i.e., whether oral, written, stenographic transcription, or otherwise,
    d. The name and address of each person now having possession or custody of any such statement, and
    e. The substance and content, as best you can recall, of each such statement.

41. Please describe any act or statement by the plaintiff which the defendant contends authorized or incited the alleged incident.
42. Is it the contention or allegation of the defendant that the plaintiff by any act or omission caused or contributed to cause the alleged occurrence?
43. If the answer to the preceding interrogatory is in the affirmative, please state in detail each act or omission by the plaintiff which it is contended or alleged caused or contributed to cause the alleged occurrence.

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