

Desertion.

1. Within the past three years, did you intentionally abandon the plaintiff or leave him or her with the intention of not returning?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to each abandonment or leaving of the plaintiff:
 - a. Each date,
 - b. A description of the circumstances and conditions present between you and the plaintiff at each such time,
 - c. Each date when you returned or attempted to return, and
 - d. The length of time in days when you were no longer with the plaintiff during each such abandonment or leave.
3. Did you know or learn that each such abandonment or leaving by you was against the plaintiff's wishes?
4. If your answer to the preceding interrogatory is in the affirmative, please state as to your knowledge or learning:
 - a. The date when you first learned or had knowledge,
 - b. A description of the information that you knew or learned, and
 - c. What, if anything, you did to avoid each such abandonment or leaving.
5. During the past three years, were you forced, against your will or desire, to leave the home or place where you lived with the plaintiff?
6. If your answer to the preceding interrogatory is in the affirmative, please state as to any such leaving:
 - a. Each date you were forced to leave,
 - b. The circumstances and conditions necessitating your leaving, and
 - c. The cause and reason for any such leaving.
7. During the past three years, were you forced, against your will or desire, to leave the home or place where you lived with the plaintiff as a result of any specific act of or conduct by the plaintiff?
8. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
 - a. A description of any physical threat,
 - b. A description of any physical violence,
 - c. A description of any mental abuse,
 - d. A description of any verbal abuse,
 - e. A description of any abuse to others,
 - f. A description of any substance abuse, and
 - g. A description of any other act found by you to be intolerable.
9. During the past three years, were you forced, against your will or desire, to leave the home or place where you lived with the plaintiff?

10. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. Each act, conduct and effort on your part to prevent having to leave,
 - b. Each reason why you did not attempt or try to remain,
 - c. Each act, conduct and effort on your part to return or attempt to return,
 - d. Each act, conduct, effort and statement by you to the plaintiff relating to your attempt to remain or return, and
 - e. A description of each act or conduct on the part of the plaintiff indicating his or her lack of consent to your leaving or returning.
11. Please state the most recent date when you had sexual relations with the plaintiff.
12. During the past three years, have you at any time refused to have sexual relations with the plaintiff?
13. If your answer to the preceding interrogatory is in the affirmative, please state as to each such refusal:
 - a. Each date, including the most recent date of refusal,
 - b. Each reason for each refusal,
 - c. Each cause for each refusal,
 - d. Each explanation for each refusal,
 - e. How the plaintiff made known his or her desire for sexual relations,
 - f. How and in what manner you refused each request of the plaintiff for sexual relations, and
 - g. Each attempt, if any, on your part to reconcile or solve the problem of your refusal to have sexual relations requested by the plaintiff.
14. Within the past three years, did you at any time by any act or conduct leave the home or place where you and the plaintiff had been living together with the intention of not returning?
15. If your answer to the preceding interrogatory is in the affirmative, please describe each effort on your part and each offer on your part to resume cohabitation, as follows:
 - a. The date of each effort,
 - b. The date of each offer,
 - c. The manner or method of each effort and offer,
 - d. The name of each person involved in any such effort and offer, indicating who did what, and
 - e. The response received by you from the plaintiff to any such effort and offer.

Adultery.

Definitions

The words "occurrence" or "alleged occurrence" as used hereinafter shall mean any intimate sexual activity or intercourse with anyone other than a spouse.

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 anyone 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. Is it the contention of the defendant that the plaintiff by any act or omission caused or contributed to the alleged occurrence?
5. 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.
6. Is it the contention of the defendant that the plaintiff aggravated or exacerbated plaintiff's injuries by any act or omission?
7. If the answer to the preceding interrogatory is in the affirmative, please state the factual basis of this contention.
8. Is it the contention of the defendant that a prior medical condition of the plaintiff caused or contributed to cause the plaintiff's injuries?
9. If the answer to the preceding interrogatory is in the affirmative, please state the factual basis of this contention.
10. Immediately after the alleged occurrence, did the defendant observe the plaintiff at or near the scene of the alleged occurrence?

11. If the answer to the preceding interrogatory is in the affirmative, please describe:
- The appearance of the plaintiff after the alleged occurrence,
 - The tone of voice used by the plaintiff after the alleged occurrence, and
 - The emotional condition of the plaintiff after the alleged occurrence.

Habitual Intoxication or Drug Use.

Habitual Intoxication

- Please describe as fully as possible the amount and regularity of the consumption of any alcoholic beverages by you for a period of five years prior to the time of the alleged occurrence, giving in your answer the nature of any such beverages and the apparent physical effects any such consumption had on you.
- Within the past five years, has any use or consumption of alcoholic beverages by you created any problems for you or others?
- If you answer to the preceding interrogatory is in the affirmative, please describe in full detail each and every problem created by your use or consumption of alcoholic beverages.
- Have you ever been told that you were an alcoholic?
- If the answer to the preceding interrogatory is in the affirmative, please state:
 - When such notice was given to you,
 - Who gave such notice to you, and
 - The form of such notice.
- Have you ever been told that you have a drinking problem relating to alcohol?
- If the answer to the preceding interrogatory is in the affirmative, please state:
 - When such notice was given to you,
 - Who gave such notice to you, and
 - The form of such notice.
- Did you have a reputation in the community for sobriety or intoxication?
- If the answer to the preceding interrogatory is in the affirmative, please describe such reputation.
- At the time of the alleged occurrence had you ever been treated, counseled, aided or advised for alcoholism by any doctor, practitioner, association, hospital, clinic or other professional person or institution?
- If the answer to the preceding interrogatory is in the affirmative, please state:
 - The date or dates of any such treatment, counseling, aid or advising,
 - The name and address of any person, association or institution treating you, and
 - The nature and extent of any such treatment, counseling, aid or advising.
- Within the past five years, have you ever been arrested for drunkenness or drunk driving?
- If your answer to the preceding interrogatory is in the affirmative, please state:
 - The date of each arrest,

- b. The name and address of each arresting officer, and
 - c. A description of the crime in which you were charged on each occasion.
14. Referring to your response to the preceding interrogatory, if any hearing or trial were held on any such arrest, please indicate the court, date of sentencing, nature and extent of rehabilitation and whether or not you resumed the use of alcohol after any such rehabilitation.
15. At the time of the alleged occurrence had you ever had your motor vehicle operator's license revoked, suspended or withdrawn by the licensing authority of any state?
16. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The date of each such revocation, suspension or withdrawal,
 - b. The duration, giving inclusive dates of each such revocation, suspension or withdrawal, and
 - c. The basis and reasons for each such revocation, suspension, or withdrawal.
17. Did you ever have any adverse reaction, including sleepiness, difficulty with coordination or problems with vision after consuming any alcoholic beverage?
18. If the answer to the preceding interrogatory is in the affirmative, please set forth for each alcoholic beverage which had such an affect on you, stating in detail each such effect.
19. Please describe in full detail, giving dates of origin, any physical defect you were afflicted with or affected by at the time of the alleged occurrence.
20. Prior to the alleged occurrence, had you ever suffered from any blackout, amnesia, mental illness, epilepsy, fainting spells, dizziness, or any other similar condition?
21. If your answer to the preceding interrogatory is in the affirmative, please state as to each such condition:
 - a. The date of its occurrence,
 - b. The place of its occurrence,
 - c. The name and address of any attending physician who treated or examined you for any such condition, and
 - d. Your physical or mental condition at the time of the alleged occurrence with respect to any such condition.
22. Was the defendant afflicted with or suffering from any medical condition, including illness, injury, ailment, infirmity, impairment or disability, immediately before or during the alleged occurrence?
23. If your answer to the preceding interrogatory is in the affirmative, please state as to each such condition:
 - a. A full and complete description, including the nature, extent and severity of each such condition,
 - b. The duration of time, in months and days, that the defendant had each such condition prior to the alleged occurrence,
 - c. Any medical or hospital examination, treatment or care that the defendant received for each such condition, including names and addresses of doctors and hospitals, and dates of care, and

- d. Any and all drugs and medications that the defendant was taking in connection with each such condition, including both brand and generic name, dosage, and frequency of administration or ingestion.
24. Please state the name and addresses of all physicians, medical practitioners, hospitals or other institutions providing examination, treatment or care for any condition of the defendant within the three-year period immediately preceding the alleged occurrence.
25. Please set forth the name and address of each person who observed the defendant during the three-hour period immediately preceding the alleged occurrence.
26. Please describe the defendant's physical condition prior to the alleged occurrence, indicating the state of the defendant's:
- Vision,
 - Hearing,
 - Motor control, and
 - Feeling of fatigue, illness or discomfort.
27. Please describe the appearance of the defendant immediately prior to and immediately following the alleged occurrence, including in your answer a complete description of the following:
- The manner in which the defendant was able to walk, stand and sit,
 - The manner in which the defendant was able to speak, including any difficulty that defendant had,
 - Whether the defendant was loud or boisterous,
 - Whether there was any odor or alcohol on the defendant's breath or clothing,
 - Whether the defendant's eyes were red or watery,
 - Whether the defendant appeared to be in any way disheveled or unkempt,
 - Whether the defendant was depressed or elated,
 - Whether the defendant was aggressive or belligerent in any way,
 - Whether the defendant appeared dazed, bewildered or otherwise confused, and
 - Whether the defendant exhibited any behavior that was out of the ordinary for the defendant, describing such behavior in detail.
28. Please set forth as accurately as the defendant can recall or determine, everything the defendant said to the plaintiff immediately before the alleged occurrence and everything the plaintiff said to the defendant.
29. Please set forth as accurately as the defendant can recall or determine, everything the defendant said to the plaintiff immediately after the alleged occurrence and everything the plaintiff said to the defendant.
30. Please state in complete detail everything the defendant did during the 30 minutes immediately following the alleged occurrence, including in your answer all physical movements and conversations.
31. Was the defendant at the time or shortly after the alleged occurrence taken into police custody?
32. If your answer to the preceding interrogatory is in the affirmative, please state:
- The reason the defendant was taken into custody,

- b. Everything the police officers said to the defendant and everything the defendant said to the police officers,
 - c. Whether the defendant made a phone call from the police station and if so whether the defendant dialed the call or someone else dialed the call,
 - d. Whether the defendant was given a breathalyzer test, and if so, what the results of that test were,
 - e. If the defendant submitted to a blood test, and if so, what the result of that test was,
 - f. The name and address of the officer who took the defendant into custody,
 - g. Whether any criminal charges were brought against the defendant as a result of the alleged occurrence, and
 - h. The disposition of any and all criminal charges brought against the defendant as a result of the alleged occurrence.
33. Did the defendant at any time during the four hours immediately following the alleged occurrence submit to a breathalyzer test, or a blood test, or any other test designed to measure sobriety?
34. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The name of each such test,
 - b. The date and time of day it was administered,
 - c. The name and address of the person who administered it,
 - d. The name and address of the place where it was administered,
 - e. The complete results, and
 - f. The name and address of the person who currently has custody of the results.
35. Did the defendant at any time during the 24-hour period immediately following the alleged occurrence refuse to submit to a breathalyzer, blood test, or any other test designed to test sobriety?
36. If your answer to the preceding interrogatory is in the affirmative, please set forth the defendant's reasons for such refusal in complete detail.
37. Was the defendant seen by any physician, nurse or medical practitioner within six hours following the alleged occurrence?
38. If your answer to the preceding interrogatory is in the affirmative, please set forth the name and address of each such doctor, nurse or medical practitioner.
39. If the defendant contends that the results of any sobriety test administered following the alleged occurrence were inaccurate or in error in any way, please set forth all facts on which the defendant bases this contention.
40. At the time of the alleged occurrence had the defendant ever been charged with any criminal offense or violation of any law relating in any way to the abuse of drugs or the consumption of alcohol?
41. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The date of each such charge,
 - b. The name and address of each court involved,
 - c. A complete description of each such charge,
 - d. The disposition of each such charge by the court, and
 - e. The name and amount of the drug or alcoholic beverage involved in each such charge.

42. Please state every act or omission on the part of the plaintiff which contributed to cause the alleged occurrence.
43. If the defendant contends that the plaintiff assumed the risk of the alleged occurrence because the plaintiff had knowledge of the physical or mental condition of the defendant, or otherwise, please set forth in complete detail all facts on which the defendant bases this contention.
44. If the defendant contends that the plaintiff contributed to cause of the alleged occurrence because the plaintiff had knowledge of the physical or mental condition of the defendant, or otherwise, please set forth in complete detail all facts on which the defendant bases this contention.
45. If the defendant contends that the plaintiff was comparatively negligent in relationship to the cause of the alleged occurrence because the plaintiff had knowledge of the physical or mental condition of the defendant, or otherwise, please set forth in complete detail all facts on which the defendant bases this contention.
46. Was the defendant consuming any drug or alcoholic beverage during the 10 minutes immediately preceding the alleged occurrence in the presence of the plaintiff?
47. If your answer to the preceding interrogatory is in the affirmative, please set forth all steps the plaintiff took to stop the defendant from such consumption.
48. If you had been drinking or consumed any alcoholic beverages within three hours of the happening of the alleged occurrence, please state:
 - a. The exact description and type of said alcoholic beverages consumed by you,
 - b. The number and quantity of said alcoholic beverages consumed by you, and
 - c. The time or times when such alcoholic beverages were consumed by you.
49. Please state whether or not, in the 10-hour period preceding the alleged occurrence, you had anything of an alcoholic nature to drink.
50. If the answer to the preceding interrogatory is in the affirmative, please state as to each such drink:
 - a. The name and address of each place where you had each such drink,
 - b. The name, address and physical description of each person who sold, dispensed, served, procured, provided, gave, supplied, delivered, set up or otherwise made each such drink available to you,
 - c. The name and address of each person known or believed to have knowledge as to your state of sobriety or intoxication at the time of each such drink,
 - d. The date and the approximate hour and minute each such drink was obtained by you.
 - e. The type, brand and name of each such drink consumed by you,
 - f. The number and size of each such drink consumed by you,
 - g. The manner in which you obtained each such drink, indicating whether you were alone or in a group, and identify the person from whom you received each such drink,
 - h. The manner in which you paid for each such drink, specifying whether it was paid for in cash, by check, was bought on credit or was given as a gift to you,
 - i. The length of time you remained in each place where you consumed each such drink specifying the time you arrived and time you left each place, and
 - j. The type of transportation you used to reach and to depart from each place where you consumed each such drink.

51. If you drank any intoxicating beverages within 12 hours prior to the alleged occurrence, please state the nature of same, the amount, and when and where said beverages were taken or consumed by you.
52. In the 24-hour period preceding the alleged occurrence, please state whether or not you took or ingested any drug, narcotic, sedative, tranquilizer, or any other form of medication or medical preparation.
53. If your answer to the preceding interrogatory is in the affirmative, please state:
- The date and time of any such taking or ingestion,
 - The name and identify of any such medication or medical preparation,
 - The amount and quantity of any such medication or medical preparation taken or ingested, and
 - Whether any such medication or medical preparation was procured under a prescription, and if so, state the name and address of the person, doctor, or practitioner by whom it was prescribed.
54. Please state the number of hours of sleep you had during the 24 hours immediately preceding the alleged occurrence.
55. Please state whether you obtained any food for yourself during the 10 hours prior to the alleged occurrence.
56. If the answer to the preceding interrogatory is in the affirmative, please state:
- The name and address of each place where you obtained such food,
 - The type and amount of such food,
 - The type and quantity of food you actually ate,
 - The approximate hour and minute of each time that you ate,
 - The name and address of each person who supplied you with food, and
 - The place where you ate such food.
57. Immediately prior to the alleged occurrence, were you in any way emotionally or mentally upset, disturbed or depressed?
58. If the answer to the preceding interrogatory is in the affirmative, please describe your mental and emotional condition fully and completely, giving any basis or reasons that may have been immediately responsible for such condition.
59. Was the plaintiff with the defendant at any time during the day of the alleged occurrence when the defendant consumed any alcoholic beverage?
60. If your answer to the preceding interrogatory is in the affirmative, please state:
- The name, address and physical description of each person who sold, dispensed, served, procured or otherwise made alcoholic drink available to the defendant,
 - The name and address of the place where such alcoholic beverage was consumed by the defendant,
 - The name and address of all persons who were present,
 - The approximate date, hour and minute when each drink was consumed by the defendant,
 - The type, brand and name of each drink which was consumed by the defendant,
 - The number and size of each drink which was consumed by the defendant,
 - The manner in which the defendant obtained each drink, specifying whether it was paid for in cash, by check, was bought on credit or was a gift, and

- h. The length of time the defendant was on the premises of each place where the defendant consumed any alcoholic beverage.
61. Did the plaintiff consume any alcoholic beverages with the defendant during the 24 hours immediately preceding the alleged occurrence?
62. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The approximate date, hour and minute when each drink was consumed by the plaintiff,
 - b. The type, brand and name of each drink which was consumed by the plaintiff,
 - c. The number and size of each type of each drink which was consumed by the plaintiff, and
 - d. The manner in which each drink consumed by the plaintiff was obtained, specifying whether it was paid for in cash, by check, was bought on credit or was a gift.
63. If the defendant and plaintiff went together to any drinking establishment or any other place where liquor was served during the 24-hour period immediately preceding the alleged occurrence, please state the mode of transportation used and the name and address of the driver, if any.
64. Did the plaintiff purchase or consume any alcoholic drink within 12 hours prior to the alleged occurrence?
65. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The precise nature and quantity of each such drink consumed,
 - b. The address where each such drink was consumed,
 - c. The name and address of the person who purchased or furnished each such drink,
 - d. The name and address of all persons present during the consumption of each such drink, and
 - e. The date and time of day each such drink was consumed.
66. Please list, by description and quantity, each beverage, food product, alcoholic beverage, drug or other substance that the plaintiff consumed during the 24-hour period immediately preceding the alleged occurrence, including the time and amount of each such consumption.