

## Drug Use

67. Within the past five years, have you ever been charged with any criminal offense or violation of any law relating in any way to the abuse of drugs?
68. If the answer to the preceding interrogatory is in the affirmative, please state:
- The date of each such charge,
  - The name and address of each court involved,
  - The complete description of each such charge,
  - The disposition of each such charge by the court, and
  - The name and amount of the drug involved in each such charge.
69. Have you ever received treatment for any form of drug or substance abuse?
70. If your answer to the preceding interrogatory is in the affirmative, please state the purpose of the treatment, the date of each such treatment, and the location.
71. Within the past three years, have you been treated for any adverse reaction, including sleepiness, difficulty with coordination or problems with vision after taking any drug or medication?
72. If the answer to the preceding interrogatory is in the affirmative, please set forth each drug or medication which had such an affect on you and state the date and time of day of the most recent taking of such drug.
73. Within the past three years, has any physician refused to renew any prescription for you?
74. If the answer to the preceding interrogatory is in the affirmative, please set forth each drug or medication and the reason given for each such refusal.
75. If within the past five years there has been any financial problem relating to your unlawful drug use, please give full details, including:
- Any creditor problem resulting from any such unlawful drug use, and
  - Any bankruptcy problem resulting from any such unlawful drug use.
76. Have you been afflicted with or suffering from any medical condition, including illness, injury, ailment, infirmity, impairment or disability within the past five years?
77. If your answer to the preceding interrogatory is in the affirmative, please state as to each such condition:
- A full and complete description, including the nature, extent and severity of each condition,
  - The duration in time, in months and days that you have had each such condition, and
  - Any medical or hospital examination, treatment or care that you received for each such condition, including names and addresses of doctors and hospitals, dates of care, any and all drugs and medications that you were taking in connection with each such condition, including both brand and generic name, dosage and frequency of administration or ingestion.
78. Please state the names and addresses of all physicians, medical practitioners, hospitals or other institutions providing examination, treatment or care for any condition which you had within the past five years.

79. Within the past five years, have you received any medication for any form of mental illness, nervous breakdown, fits, convulsions, fainting spells or epilepsy?
80. If your answer to the preceding interrogatory is in the affirmative, please state as to each such condition:
- The date or dates,
  - The name and address of each doctor, practitioner, hospital or other health care institution treating you for each such condition, and
  - The generic and brand name of each drug which was prescribed for you for each such condition.
81. Have you ever used an illegal drug?
82. If your answer to the preceding interrogatory is in the affirmative, please state the circumstances, type of drug, and dates of such use.
83. Have you ever abused prescription medication?
84. If your answer to the preceding interrogatory is in the affirmative, please state the circumstances, type of drug, and dates of such use.
85. Please list all prescription and nonprescription medication that you have taken in the past five years.
86. Please indicate the physical or emotional complaint, including illness, injury, ailment, infirmity, impairment or disability for which each of the medicines in the preceding interrogatory was taken, including as to each such condition:
- A full and complete description, including the nature, extent and severity of each condition,
  - The duration in time, in months and days, that you have had each such condition,
  - Any medical or hospital examination, treatment or care that you received for each such condition, including names and addresses of doctors and hospitals with the dates of care, and
  - Any and all drugs and medications that you were taking in connection with each such condition, including both brand and generic name, dosage and frequency of administration or ingestion.
87. Please state the physical effect of each prescription or nonprescription medication listing in the preceding interrogatory, including all side effects that you experienced.
88. Please list any and all drugs which the defendant took, received or had administered during the 48-hour period immediately preceding the alleged occurrence, including in your answer for each such drug:
- The trade and generic name,
  - The date of first prescription,
  - Dosage usually taken daily,
  - Times and dosages taken during the 48-hour period immediately preceding the alleged occurrence,
  - Reason for taking,
  - All precautions or warnings given to the defendant by the person who prescribed the drug, and
  - The name and address of the drug store or pharmacy where the prescription was filed.

89. Please list, by description and quantity, each beverage, food product, alcoholic beverage, drug or other substance that the defendant consumed during the 48-hour period immediately preceding the alleged occurrence, including the time and amount of each such consumption.
90. During the 24-hour period immediately preceding the alleged occurrence, did the defendant take or ingest any drug, narcotic, sedative, tranquilizer, or any other form of medication or medical preparation?
91. If your answer to the preceding interrogatory is in the affirmative, please state:
- The brand and generic name of each such drug or medication,
  - The date and time of day of taking each such drug,
  - The dose taken, and
  - If the drug or medication was prescribed, the name and address of the medical practitioner who prescribed it and the date of the prescription.
92. Did the defendant take any prescription drugs during the 24-hour period immediately preceding the alleged occurrence?
93. If your answer to the preceding interrogatory is in the affirmative, please state:
- The name, address and specialty of the person who prescribed each such drug,
  - The generic and brand name of each such drug,
  - The date on which each such drug was prescribed,
  - The reason each such drug was prescribed,
  - All dates on which the defendant had seen the person who prescribed each such drug prior to the date of the alleged occurrence,
  - All oral and written instructions the person who prescribed each such drug gave the defendant regarding its use and effects on the defendant,
  - All precautions and warnings the person who prescribed each such drug gave the defendant regarding its use and effects on the defendant,
  - All precautions and warnings the person who prescribed each such drug gave the defendant regarding its use with alcoholic beverages,
  - All precautions and warnings the person who prescribed each such drug gave the defendant regarding driving following ingestion or injection of it, and
  - The substance of all conversations had between the defendant and the person who prescribed each such drug concerning the use of the drug by the defendant.
94. If the defendant ate any food during the 12-hour period immediately preceding the alleged occurrence, please state:
- The quantity, type and kind of such food,
  - The date and time of day in hours and minutes that such food was eaten, and
  - The address of the place at which such food was eaten.
95. Please set forth the name and address of each person who observed the defendant during the three-hour period immediately preceding the alleged occurrence.
96. Please state the number of hours of sleep the defendant had during the 24-hour period immediately preceding the alleged occurrence.
97. Has the defendant, prior to the alleged occurrence, ever consumed or taken any hallucinogenic drug?

98. If your answer to the preceding interrogatory is in the affirmative, please state the name of each such drug and the date on which each such drug was last consumed or taken prior the alleged occurrence.

Refusal of Conjugal Relationship.

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. If, during the past three years, you ever refused any plaintiff's request for sexual intimacy or sexual intercourse, was impotency a reason for your refusal?
7. If your answer to the preceding interrogatory is in the affirmative, please state as to any such impotency:
  - a. Each date,
  - b. Each medical or other treatment, if any, received by you,
  - c. The identification, including name and address, of each health care professional seen by you or who treated you,
  - d. Each drug, alcohol, or medication which may have caused your impotency,
  - e. A description of your impotency, and
  - f. The effect of your impotency on your sexual behavior.
8. If, during the past three years, you ever refused any plaintiff's request for sexual intimacy or sexual intercourse, was physical or mental illness a reason for your refusal?
9. If your answer to the preceding interrogatory is in the affirmative, please state as to any such illness:
  - a. Each date,
  - b. Each medical or other treatment,
  - c. The identification, including name and address, of each health care professional seen by you or who treated you,
  - d. A description of each such illness, and
  - e. The effect of your illness on your sexual behavior.
10. If, during the past three years, you ever refused any plaintiff's request for sexual intimacy or sexual intercourse, was any act, conduct or behavior by the plaintiff a reason for your refusal?

11. If your answer to the preceding interrogatory is in the affirmative, please state as to any act, conduct or behavior:
  - a. Each date,
  - b. A description of each such act, conduct or behavior, indicating who said and did what to whom, and
  - c. The effect of each such act, conduct or behavior on your sexual behavior.
12. If, during the past three years, you ever refused any of plaintiff's request for sexual intimacy or sexual intercourse, please state each reason for your refusal, explaining the date, time, place, actions of the plaintiff and your actions.
13. Within the past three years, has there been any effort made by the plaintiff to attempt to resolve any problem relating the conjugal or marriage relationship between the defendant and the plaintiff?
14. If your answer to the preceding interrogatory is in the affirmative, please state as to any such effort:
  - a. Each date involved,
  - b. A description of each problem,
  - c. A description of each attempted effort,
  - d. A description of the success or failure of each attempted effort, and
  - e. Each reason why any such effort was not effective.
15. Within the past three years, has there been any effort made by the defendant to attempt to resolve any problem relating to the conjugal or marriage relationship between the defendant and the plaintiff?
16. If your answer to the preceding interrogatory is in the affirmative, please state as to any such effort:
  - a. Each date involved,
  - b. A description of each problem,
  - c. A description of each attempted effort,
  - d. A description of the success or failure of each attempted effort, and
  - e. Each reason why any such effort was not effective.
17. Within the past three years, has there been any effort by either the plaintiff or defendant to seek counseling for any problem related to the conjugal or marriage relationship between the plaintiff and the defendant?

18. If your answer to the preceding interrogatory is in the affirmative, please state as to any such effort:
- A description of any effort by the plaintiff,
  - A description of any effort by the defendant,
  - Each date involved,
  - A description of each problem,
  - The name and address of each counselor involved,
  - The result of each such effort,
  - The identity of the person who stopped any such effort, and
  - Each reason for stopping any such effort.

Incompatibility.

- Has there been incompatibility as to religion between the plaintiff and the defendant in their marriage?
- If your answer to the preceding interrogatory is in the affirmative, please state as to any such religion's incompatibility:
  - The form of such religion's incompatibility,
  - The practices which form the basis of such religion's incompatibility,
  - The beliefs and preferences which form the basis of such religion's incompatibility,
  - The restrictions which form the basis of such religion's incompatibility, and
  - Each area of conflict between the plaintiff's religion and the defendant's religion which form the basis of such religion's incompatibility.
- Has there been incompatibility as to lifestyles between the plaintiff and the defendant in their marriage?
- If your answer to the preceding interrogatory is in the affirmative, please state as to any such lifestyle incompatibility:
  - Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle which form the basis for such lifestyle incompatibility,
  - The form of such lifestyle incompatibility,
  - The practices which form the basis of such lifestyle incompatibility,
  - The beliefs and preferences which form the basis of such lifestyle incompatibility, and
  - The effect of such incompatibility on the marriage.
- Has there been a lifestyle incompatibility as to living locations, whether rural, urban or suburban, between the plaintiff and the defendant in their marriage?
- If your answer to the preceding interrogatory is in the affirmative, please describe as to any such living location lifestyle incompatibility:
  - Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
  - The beliefs and preferences which form the basis of such incompatibility,
  - The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,

- d. All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
  - e. The effect of such incompatibility on the marriage.
7. Has there been a lifestyle incompatibility as to marital activities, whether sedate, active, group-oriented, individual-oriented, between the plaintiff and the defendant in their marriage?
8. If your answer to the preceding interrogatory is in the affirmative, please describe as to any such marital activities lifestyle incompatibility:
- a. Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
  - b. The beliefs and preferences which form the basis of such incompatibility,
  - c. The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,
  - d. All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
  - e. The effect of such incompatibility on the marriage.
9. Has there been a lifestyle incompatibility as to the number of children in the family, whether none, many or one or two, between the plaintiff and the defendant in their marriage?
10. If your answer to the preceding interrogatory is in the affirmative, please describe as to any such number of children in the family lifestyle incompatibility:
- a. Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
  - b. The beliefs and preferences which form the basis of such incompatibility,
  - c. The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,
  - d. All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
  - e. The effect of such incompatibility on the marriage.
11. Has there been a lifestyle incompatibility as to hobbies and recreation, whether group, individual, how time spent, cost and type of activity, between the plaintiff and the defendant in their marriage?
12. If your answer to the preceding interrogatory is in the affirmative, please describe as to any such hobbies and recreation lifestyle incompatibility:
- a. Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
  - b. The beliefs and preferences which form the basis of such incompatibility,
  - c. The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,
  - d. All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
  - e. The effect of such incompatibility on the marriage.
13. Has there been a lifestyle incompatibility as to family travel between the plaintiff and the defendant in their marriage?

14. If your answer to the preceding interrogatory is in the affirmative, please describe as to any such family travel lifestyle incompatibility:
- Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
  - The beliefs and preferences which form the basis of such incompatibility,
  - The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,
  - All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
  - The effect of such incompatibility on the marriage.
15. Has there been a lifestyle incompatibility as to friends and associates, including description, names, meeting places, activities engaged in and time spent together, between the plaintiff and the defendant in their marriage?
16. If your answer to the preceding interrogatory is in the affirmative, please describe as to any such friends and associates lifestyle incompatibility:
- Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
  - The beliefs and preferences which form the basis of such incompatibility,
  - The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,
  - All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
  - The effect of such incompatibility on the marriage.
17. Has there been a lifestyle incompatibility as to education, including objectives, degrees and training, between the plaintiff and the defendant in their marriage?
18. If your answer to the preceding interrogatory is in the affirmative, please describe as to any such education lifestyle incompatibility:
- Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
  - The beliefs and preferences which form the basis of such incompatibility,
  - The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,
  - All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
  - The effect of such incompatibility on the marriage.
19. Has there been a lifestyle incompatibility as to employment, including objectives, willingness to sacrifice for advancement, value of leisure time compared to financial rewards, between the plaintiff and the defendant in their marriage?
20. If your answer to the preceding interrogatory is in the affirmative, please describe as to any such employment lifestyle incompatibility:
- Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
  - The beliefs and preferences which form the basis of such incompatibility,
  - The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,

- d. All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
- e. The effect of such incompatibility on the marriage.
21. Has there been a lifestyle incompatibility as to business ownership, including demands of time and special expertise required, between the plaintiff and the defendant in their marriage?
22. If your answer to the preceding interrogatory is in the affirmative, please describe as to any such business ownership lifestyle incompatibility:
- a. Each area of conflict between the plaintiff's lifestyle and the defendant's lifestyle,
- b. The beliefs and preferences which form the basis of such incompatibility,
- c. The intensity and depth of feeling of both the plaintiff and the defendant as to each such incompatibility,
- d. All efforts which have been made by the plaintiff and the defendant to accommodate or overcome each such lifestyle incompatibility, and
- e. The effect of such incompatibility on the marriage.
23. Has the plaintiff in the past three years undertaken any act or conduct to recognize, moderate or accommodate any area of incompatibility in the marriage between the plaintiff and the defendant?
24. If your answer to the preceding interrogatory is in the affirmative, please state as to any such act or conduct:
- a. Each date,
- b. A description of each act or conduct,
- c. Each change or accommodation made in any activity or lifestyle, and
- d. The effect on the marriage as a result of each such act or conduct.
25. Has the defendant in the past three years undertaken any act or conduct to recognize, moderate or accommodate any area of incompatibility in the marriage between the plaintiff and the defendant?
26. If your answer to the preceding interrogatory is in the affirmative, please state as to any such act or conduct:
- a. Each date,
- b. A description of each act or conduct,
- c. Each change or accommodation made in any activity or lifestyle, and
- d. The effect on the marriage as a result of each such act or conduct.
- Irretrievable Breakdown of Marriage.
1. If is your allegation, contention or belief that there is or has been an irretrievable breakdown of the marriage between the plaintiff and the defendant?
2. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The factual basis for such allegation, contention, or belief,
- b. A description of each difficulty or problem within the marriage,

- c. An identification of each person or condition causing or contributing to the cause of each difficulty or problem within the marriage,
  - d. Each act or conduct by either the plaintiff or the defendant which could have been taken but was not done or undertaken to repair or improve the marriage, and
  - e. Each reason known to you or believed by you why any such act or conduct was not done or undertaken to repair or improve the marriage.
3. Within the past three years, was any act or conduct done or attempted by either the plaintiff or the defendant which was for the purpose of repairing or improving the marriage between the plaintiff and the defendant?
4. If your answer to the preceding interrogatory is in the affirmative, please state as to any such act or conduct:
  - a. The identify of either the plaintiff or the defendant, or both, who did any act or carried out any conduct in an effort to repair or improve the marriage,
  - b. A description of each such act or conduct,
  - c. An evaluation or assessment as to whether any such act or conduct helped or did not help the marriage, and
  - d. If any such act or conduct did not help the marriage, please state each reason why such act or conduct did not help.
5. If, during the past three years, either the plaintiff or the defendant was involved in any marriage counseling, please state:
  - a. The name and address of each counselor,
  - b. The date of each such involvement,
  - c. The purpose of each such involvement, and
  - d. The reason why each such involvement was terminated.
6. If, during the past three years, either the plaintiff or the defendant was involved in any examination or treatment for alcohol or substance or drug abuse, please state:
  - a. The identification of each person involved, whether the plaintiff or the defendant, or both,
  - b. The date of each such involvement,
  - c. The name and address of each place or location involved,
  - d. The purpose of each such involvement, and
  - e. The reason for the termination of each such involvement.
7. If, during the past three years, either the plaintiff or the defendant made any change in his or her lifestyle, please state:
  - a. A description of each such change,
  - b. The date of each such change,
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.

8. If, during the past three years, either the plaintiff or the defendant made any change in his or her religion, please state:
  - a. A description of each such change,
  - b. The date of each such change
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.
  
9. If, during the past three years, either the plaintiff or the defendant made any change in his or her living location, please state:
  - a. A description of each such change,
  - b. The date of each such change,
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.
  
10. If, during the past three years, either the plaintiff or the defendant made any change in his or her sexual activities, please state:
  - a. A description of each such change,
  - b. The date of each such change,
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.
  
11. If, during the past three years, either the plaintiff or the defendant made any change in his or her hobbies, recreation or leisure activities, please state:
  - a. A description of each such change,
  - b. The date of each such change,
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.
  
12. If, during the past three years, either the plaintiff or the defendant made any change in his or her travel activities, please state:
  - a. A description of each such change,

- b. The date of each such change,
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.
13. If, during the past three years, either the plaintiff or the defendant made any change in his or her activities or conduct with friends or associates, please state:
  - a. A description of each such change,
  - b. The date of each such change,
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.
14. If, during the past three years, either the plaintiff or the defendant made any change in his or her hours of employment or self-employment, please state:
  - a. A description of each such change,
  - b. The date of each such change,
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.
15. If, during the past three years, either the plaintiff or the defendant made any change in his or her work activities, please state:
  - a. A description of each such change,
  - b. The date of each such change,
  - c. The reason or purpose of each such change,
  - d. A description of how or in what manner each such change caused any problem to the marriage, and
  - e. A description of how or in what manner each such change improved or benefited the marriage.
16. If it is your contention, allegation or belief that any act or conduct undertaken by either the plaintiff or the defendant to repair or improve the marriage failed or was ineffective as a result of the lack of cooperation of the plaintiff, please state the factual basis of each such contention or allegation.
17. If it is your contention, allegation or belief that any act or conduct undertaken by either the plaintiff or the defendant to repair or improve the marriage failed or was ineffective as a result of the lack of cooperation of the defendant, please state the factual basis of each such contention or allegation.