

Property Whose Ownership is Disputed.

1. Please state as to each item of real estate or real property having a value in excess of \$100.00 which you allege, contend or believe is currently owned by the plaintiff, including as to each such item:
 - a. A description,
 - b. The current location,
 - c. The fair market value,
 - d. The manner or method of acquisition by the plaintiff,
 - e. The financial contribution made by the plaintiff toward such acquisition, and
 - f. The factual basis for your allegation, contention or belief.
2. Please state as to each item of real estate or real property having a value in excess of \$100 which you allege, contend or believe is currently owned by the defendant, including as to each such item:
 - a. A description,
 - b. The current location,
 - c. The fair market value,
 - d. The manner or method of acquisition by the defendant,
 - e. The financial contribution made by the defendant, toward such acquisition, and
 - f. The factual basis for your allegation, contention or belief.
3. Please state as to each item of personal property, including financial instruments, stocks, bonds and other documents of value having a value in excess of \$100 which you allege, contend or believe is currently owned by the plaintiff, including as to each such item:
 - a. A description,
 - b. The current location,
 - c. The fair market value,
 - d. The manner or method of acquisition by the plaintiff,
 - e. The financial contribution made by the plaintiff toward such acquisition, and
 - f. The factual basis for your allegation, contention or belief.
4. Please state as to each item of personal property, including financial instruments, stocks, bonds and other documents of value having a value in excess of \$100 which you allege, contend or believe is currently owned by the defendant, including as to each such item:
 - a. A description,
 - b. The current location,
 - c. The fair market value,
 - d. The manner or method of acquisition by the defendant,
 - e. The financial contribution made by the defendant toward such acquisition, and
 - f. The factual basis for your allegation, contention or belief.
5. Please state as to each item of business property having a value in excess of \$100 which you allege, contend or believe is currently owned by the plaintiff, including as to each such item:

- a. A description,
 - b. The current location,
 - c. The fair market value,
 - d. The manner or method of acquisition by the plaintiff,
 - e. The financial contribution made by the plaintiff toward such acquisition, and
 - f. The factual basis for your allegation, contention or belief.
6. Please state as to each item of business property having a value in excess of \$100 which you allege, contend or believe is currently owned by the defendant, including as to each such item:
- a. A description,
 - b. The current location,
 - c. The fair market value,
 - d. The manner or method of acquisition by the defendant,
 - e. The financial contribution made by the defendant toward such acquisition, and
 - f. The factual basis for your allegation, contention or belief.

Contributions to Marriage or Relationship.

1. If the plaintiff made any financial contribution to the marriage or the relationship between the plaintiff and the defendant, please identify the dollar amount of any such financial contribution as to the following:
- a. Any salary and wages,
 - b. Any self-employed income,
 - c. Any investment earnings,
 - d. Any gifts, including the type, value and disposition,
 - e. Any inheritance, including the type, value and disposition,
 - f. Any payment from any contract, including each date and amount,
 - g. Any trust corpus and distribution,
 - h. Winnings, and
 - i. Other.
2. If the defendant made any financial contribution to the marriage or the relationship between the plaintiff and the defendant, please identify the dollar amount of any such financial contribution as to the following:
- a. Any salary and wages,
 - b. Any self-employed income,
 - c. Any investment earnings,
 - d. Any gifts, including the type, value and disposition,
 - e. Any inheritance, including the type, value and disposition,
 - f. Any payment from any contract, including each date and amount,
 - g. Any trust corpus and distribution,
 - h. Winnings, and
 - i. Other.

3. If the plaintiff worked in the family business and as a result made a financial contribution to the marriage or the relationship between the plaintiff and the defendant, please identify the dollar amount of any such financial contribution as to the following:
 - a. A description of the kind and type of work done,
 - b. The name and address of the family business,
 - c. The hours worked,
 - d. The monetary value of the work,
 - e. The amount paid by the family business after withholdings, and
 - f. The financial contribution.

4. If the defendant worked in the family business and as a result made a financial contribution to the marriage or the relationship between the plaintiff and the defendant, please identify the dollar amount of any such financial contribution as to the following:
 - a. A description of the kind and type of work done,
 - b. The name and address of the family business,
 - c. The hours worked,
 - d. The monetary value of the work,
 - e. The amount paid by the family business after withholdings, and
 - f. The financial contribution.

5. If the family of the plaintiff provided support activities for the marriage or relationship between the plaintiff and the defendant, please state the time and financial contribution of each such family support activity, as follows:
 - a. A description,
 - b. Child care including staying home, transportation and participation in activities,
 - c. Housekeeping,
 - d. House maintenance,
 - e. Keeping family accounts,
 - f. Meal preparation,
 - g. Motor vehicle maintenance, and
 - h. Other.

6. If the family of the defendant provided support activities for the marriage or relationship between the plaintiff and the defendant, please state the time and financial contribution of each such family support activity, as follows:
 - a. A description,
 - b. Child care including staying home, transportation and participation in activities,
 - c. Housekeeping,
 - d. House maintenance,
 - e. Keeping family accounts,
 - f. Meal preparation,
 - g. Motor vehicle maintenance, and
 - h. Other.

7. If personal support was given to the plaintiff during the marriage or relationship between the plaintiff and the defendant, please state a description of the nature and extent of the following bases of personal support:
- Advice and counsel,
 - Loans,
 - Gifts,
 - Financial support, and
 - Other.
8. If personal support was given to the defendant during the marriage or relationship between the plaintiff and the defendant, please state a description of the nature and extent of the following bases of personal support:
- Advice and counsel,
 - Loans,
 - Gifts,
 - Financial support, and
 - Other.
9. If you deny that the plaintiff made any contribution during the marriage and relationship between the plaintiff and the defendant, please state in detail the factual basis for each such denial as to the following:
- Financial support,
 - Work in family business,
 - Family support activities, and
 - Personal support.
10. If you deny that the defendant made any contribution during the marriage and relationship between the plaintiff and the defendant, please state in detail the factual basis for each such denial as to the following:
- Financial support,
 - Work in family business,
 - Family support activities, and
 - Personal support.
- Opportunities Lost.
1. During the past five years, did the defendant, by any act or conduct, prevent or discourage the plaintiff from the plaintiff's idea of enrolling in an education course?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
- The date,
 - A description of each such act or conduct,

- c. The manner and method by which the defendant prevented or discouraged the plaintiff, and
 - d. Each reason why the defendant prevented or discouraged the plaintiff.
3. If your answer to interrogatory number 1 is in the negative, please state:
 - a. The factual basis for your allegation, contention or belief that the defendant did not prevent or discourage the plaintiff,
 - b. Each act or conduct by the defendant to encourage the plaintiff with his or her idea, and
 - c. Each reason why the plaintiff did not seek or pursue his or her idea.
4. Is it the defendant's allegation, contention or belief that the plaintiff's idea for enrolling in an education course but never actually carrying out his or her idea was not a lost opportunity to the plaintiff as a result of the marriage between the plaintiff and the defendant?
5. If your answer to the preceding interrogatory is in the affirmative, please state the reason and the factual basis for the defendant's allegation, contention or belief.
6. During the past five years, did the defendant, by any act or conduct, prevent or discourage the plaintiff from the plaintiff's idea of obtaining employment?
7. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
 - a. The date,
 - b. A description of each such act or conduct,
 - c. The manner and method by which the defendant prevented or discouraged the plaintiff, and
 - d. Each reason why the defendant prevented or discouraged the plaintiff.
8. If your answer to interrogatory number 6 is in the negative, please state:
 - a. The factual basis for your allegation, contention or belief that the defendant did not prevent or discourage the plaintiff,
 - b. Each act or conduct by the defendant to encourage the plaintiff with his or her idea, and
 - c. Each reason why the plaintiff did not seek or pursue his or her idea.
9. Is it the defendant's allegation, contention or belief that the plaintiff's idea for obtaining employment but never actually carrying out his or her idea was not a lost opportunity to the plaintiff as a result of the marriage between the plaintiff and the defendant?
10. If your answer to the preceding interrogatory is in the affirmative, please state the reason and the factual basis for the defendant's allegation, contention or belief.
11. During the past five years, did the defendant, by any act or conduct, prevent or discourage the plaintiff from the plaintiff's idea of having children?
12. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
 - a. The date,
 - b. A description of each such act or conduct,

- c. The manner and method by which the defendant prevented or discouraged the plaintiff, and
 - d. Each reason why the defendant prevented or discouraged the plaintiff.
13. If your answer to interrogatory number 11 is in the negative, please state:
 - a. The factual basis for your allegation, contention or belief that the defendant did not prevent or discourage the plaintiff,
 - b. Each act or conduct by the defendant to encourage the plaintiff with his or her idea, and
 - c. Each reason why the plaintiff did not seek or pursue his or her idea.
14. Is it the defendant's allegation, contention or belief that the plaintiff's idea for having children but never actually carrying out his or her idea was not a lost opportunity to the plaintiff as a result of the marriage between the plaintiff and the defendant?
15. If your answer to the preceding interrogatory is in the affirmative, please state the reason and the factual basis for the defendant's allegation, contention or belief.
16. During the past five years, did the defendant, by any act or conduct, prevent or discourage the plaintiff from the plaintiff's idea of making a financial investment (details)?
17. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
 - a. The date,
 - b. A description of each such act or conduct,
 - c. The manner and method by which the defendant prevented or discouraged the plaintiff, and
 - d. Each reason why the defendant prevented or discouraged the plaintiff.
18. If your answer to interrogatory number 16 is in the negative, please state:
 - a. The factual basis for your allegation, contention or belief that the defendant did not prevent or discourage the plaintiff,
 - b. Each act or conduct by the defendant to encourage the plaintiff with his or her idea, and
 - c. Each reason why the plaintiff did not seek or pursue his or her idea.
19. Is the defendant's allegation, contention or belief that the plaintiff's idea of making a financial investment (details) but never actually carrying out his or her idea was not a lost opportunity to the plaintiff as a result of the marriage between the plaintiff and the defendant?
20. If your answer to the preceding interrogatory is in affirmative, please state the reason and the factual basis for the defendant's allegation, contention or belief.

Marital Rape.

Definitions

As used in these interrogatories, the words "occurrence" or "alleged occurrence" shall mean the facts involved in the combined events and incidents which allegedly caused injury or damage to the plaintiff as a result of the alleged marital rape or alleged attempted marital rape of the plaintiff by the defendant.

1. Please state the legal status of the marriage between the plaintiff and the defendant at the time of the alleged occurrence, indicating:
 - a. Married and living together,
 - b. Married and living separately,
 - c. Court-approved separation,
 - d. Divorce proceedings filed, and
 - e. Awaiting final divorce decree.
2. What is the defendant's blood type?
3. Within one year prior to the alleged occurrence, if the plaintiff and the defendant had engaged in any act of sexual intercourse, please state as to each such act:
 - a. The frequency,
 - b. The time, and
 - c. The place.
4. Within one year prior to the alleged occurrence, had the defendant ever requested the plaintiff's consent for sexual intercourse between the defendant and the plaintiff?
5. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The defendant's kind and type of request for consent, whether oral, written or physical,
 - b. The frequency of each such request, and
 - c. An explanation of why consent was requested at some times and not other times.
6. Within one year prior to the alleged occurrence, had the plaintiff ever denied any request by the defendant for sexual intercourse with the plaintiff?
7. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The kind and type of denial, whether oral, written or physical,
 - b. The frequency, and
 - c. Each reason or explanation given.
8. At the time of the alleged occurrence, did the defendant and the plaintiff engage in the same sexual acts, other than sexual intercourse, as they had done before the alleged occurrence?

9. If your answer to the preceding interrogatory is in the affirmative, please state:
- A description of each such act, and
 - The frequency of each such act.
10. At the time of the alleged occurrence, did the defendant use any force, including any oral threat, against the plaintiff before any attempt by the defendant to have sexual intercourse with the plaintiff?
11. If your answer to the preceding interrogatory is in the affirmative, please state:
- Did the defendant threaten harm to the plaintiff,
 - Did the defendant threaten harm to any child of the plaintiff,
 - Did the defendant threaten harm to any property of the plaintiff,
 - Did the defendant threaten harm to any third party,
 - A description of the nature and extent of any force used, and
 - A description of the nature, extent and substance of any oral threat?
12. At the time of the alleged occurrence, did the defendant use any force, including any physical conduct, against the plaintiff before any attempt by the defendant to have sexual intercourse with the plaintiff?
13. If your answer to the preceding interrogatory is in the affirmative, please state:
- Did the defendant beat or strike the plaintiff,
 - Did the defendant physically threaten to strike or hit the plaintiff,
 - Did the defendant hold down the plaintiff by physical force,
 - Did any third party hold down the plaintiff by physical force, and if so, identify the third party by name, address and any relationship to the plaintiff or the defendant, and
 - Did the defendant tie up or restrain the plaintiff?
14. At the time of the alleged occurrence, did the defendant use any force, including any intimidation, against the plaintiff prior to any attempt by the defendant to have sexual intercourse with the plaintiff?
15. If your answer to the preceding interrogatory is in the affirmative, please state:
- A description in detail of each act of intimidation, and
 - The substance of any conversation between the defendant and the plaintiff, indicating who said what to whom as to any intimidation.
16. At the time of the alleged occurrence, did the defendant use any force, including any fraudulent act, against the plaintiff prior to any attempt by the defendant to have sexual intercourse with the plaintiff?
17. If your answer to the preceding interrogatory is in the affirmative, please state:
- A description of each fraudulent act,
 - Whether the defendant claimed that the defendant's conduct was in the plaintiff's best interest,
 - Whether the defendant claimed that the plaintiff had no legal right to refuse, and

- d. Whether the defendant claimed that the defendant's conduct was necessary medical treatment.
18. At the time of the alleged occurrence, was it possible for the defendant to obtain or receive the plaintiff's consent?
19. If your answer to the preceding interrogatory is in the affirmative, please state as to the plaintiff's physical, mental and legal status:
- a. The plaintiff was conscious,
b. The plaintiff was not intoxicated,
c. The plaintiff was not mentally deficient,
d. The plaintiff was competent, and
e. The plaintiff was above the statutory age for consent.
20. At the time of the alleged occurrence just prior to any sexual intercourse between the defendant and the plaintiff, did the defendant request, seek or attempt to obtain the plaintiff's consent to sexual intercourse?
21. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. A description of any oral request, whether express or implied, indicating as to any conversation between the defendant and the plaintiff, who said what to whom, and
b. A description of any physical act or conduct on the part of the defendant, whether a physical motion or body language which the defendant believed was a request for sexual intercourse.
22. At the time of the alleged occurrence, prior to any sexual intercourse between the defendant and the plaintiff occurred, did the plaintiff give or grant to the defendant any consent to or for sexual intercourse?
23. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. A description of any oral consent, whether express or implied, indicating as to any conversation between the plaintiff and the defendant, who said what to whom, and
b. A description of any physical act or conduct on the part of the plaintiff, whether a physical motion or body language which the defendant believed was the plaintiff's consent for sexual intercourse.
24. At the time of the alleged occurrence, prior to any sexual intercourse between the defendant and the plaintiff occurred, did the plaintiff either orally or physically withdraw the plaintiff's consent to the defendant's sexual intercourse with the plaintiff?
25. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. A description of any oral withdrawal of consent, whether express or implied, indicating as to any conversation between the plaintiff and the defendant, who said what to whom,
b. A description of any physical act or conduct on the part of the plaintiff whether a physical motion or body language which the defendant understood or believed was the plaintiff's withdrawal of consent for sexual intercourse, and

- c. The defendant's understanding or belief as to what the plaintiff meant by withdrawing consent.
26. Is it the defendant's contention, allegation or belief that the plaintiff's consent was not necessary for the defendant to engage in sexual intercourse with the plaintiff?
27. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief.
28. At the time of the alleged occurrence, did the defendant physically engage in sexual intercourse with the plaintiff?
29. If your answer to the preceding interrogatory is in the affirmative, please state:
- Whether penetration by the defendant occurred,
 - The depth of the defendant's penetration, and
 - Whether ejaculation on the part of the defendant occurred.
30. At the time of the alleged occurrence, did the defendant engage in intimate sexual acts, other than sexual intercourse, with the plaintiff?
31. If your answer to the preceding interrogatory is in the affirmative, please state:
- A description of any oral sex, including cunnilingus or fellatio, which occurred,
 - A description of any masturbation, whether plaintiff to defendant or defendant to plaintiff, which occurred,
 - A description of any sodomy which occurred,
 - A description of any bondage which occurred, and
 - A description of any other intimate sexual activity which occurred.
32. At the time of and during the alleged occurrence, did the plaintiff, by any physical act or oral statement, indicate that the plaintiff did not want the defendant to engage in any sexual intercourse with the plaintiff?
33. If your answer to the preceding interrogatory is in the affirmative, please state whether the plaintiff:
- Pushed the defendant away,
 - Physically hit, struck slapped or scratched the defendant,
 - Told the defendant that the plaintiff did not want to engage in sexual intercourse,
 - Screamed or shouted at the defendant,
 - Screamed or shouted for help, and
 - Begged for the defendant not to engage in sexual intercourse.
34. Immediately after the alleged occurrence, did the defendant have any physical injuries due in any way to the alleged occurrence?
35. If your answer to the preceding interrogatory is in the affirmative, please state as to any such physical injury:
- Scratches,
 - Scrapes,
 - Bruises,
 - Cuts,

- e. Bumps,
- f. Broken bones, and
- g. Any other physical injury.

36. Immediately after the alleged occurrence, did the defendant seek or receive any examination or treatment from any health care professional for any physical injury received by the defendant as a result of the occurrence?
37. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The name and address of any health care institution examining or treating the defendant, and
 - b. The name, address and medical specialty of any health care professional examining or treating the defendant, whether physician, nurse, emergency medical technician, ambulance attendant, police officer, third party or other.
38. Within 48 hours after the alleged occurrence, did the defendant make any oral or written statement to anyone about the alleged occurrence?
39. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The name, address and, if any, relationship to the defendant and the plaintiff,
 - b. The substance of any such oral statement, indicating who said what to whom,
 - c. The verbatim substance of any such statement in writing,
 - d. The date, time and place of the making of any such statement,
 - e. Whether any such statement was made to the plaintiff,
 - f. Whether any such statement was made to any health care professional,
 - g. Whether any such statement was made to any police officer, ambulance driver or other emergency governmental person, and
 - h. Whether any such statement was made to any third person.
40. Within three hours after the alleged occurrence, please describe each act or statement relating to the conduct of the plaintiff, indicating whether the plaintiff:
- a. Remained with the defendant,
 - b. Demonstrated affection toward the defendant,
 - c. Engaged in subsequent sexual acts with the defendant,
 - d. Left the place of the alleged occurrence,
 - e. Cried,
 - f. Fainted or became unconscious,
 - g. Yelled or screamed,
 - h. Asked the defendant to leave the place of the alleged occurrence,
 - i. Demanded that the defendant leave the place of the alleged occurrence,
 - j. Threatened the defendant,
 - k. Called the police, and
 - l. Called a third party, and if so, give the name and address of the third party.

41. Within three hours after the alleged occurrence, please describe each act or statement relating to the conduct of the defendant, indicating whether the defendant:
- Remained with the plaintiff,
 - Demonstrated affection toward the plaintiff,
 - Engaged in subsequent sexual acts with the plaintiff,
 - Immediately left the place of the alleged occurrence,
 - Apologized to the plaintiff,
 - Became unconscious or fell asleep,
 - Yelled or screamed,
 - Asked the plaintiff to leave the place of the alleged occurrence,
 - Threatened the plaintiff, and
 - Communicated with a third party, and if so, give the name and address of the third party.
42. Please describe in detail the condition of the place of the occurrence within three hours immediately after the alleged occurrence, indicating whether the place:
- Was disheveled,
 - Was in disrepair,
 - Contained broken objects, and
 - Was without significant disruption or damage.
43. Is it the defendant's contention, allegation or belief that the defendant was not physically present with the plaintiff at the time of the alleged occurrence?
44. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, including:
- The place where the defendant was, if not with the plaintiff, at the time of the alleged occurrence, and
 - The identity, including name and address, of each person who has any knowledge of the whereabouts of the defendant at the time of the alleged occurrence.
45. Is it the defendant's contention, allegation or belief that, at the time of the alleged occurrence, the plaintiff consented to the defendant's sexual intercourse with the plaintiff?
46. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, including:
- Whether the consent was express consent, and
 - Whether the consent was implied consent.
47. Is it the defendant's contention, allegation or belief that the plaintiff did not have a reputation for proper moral conduct?
48. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- A description of the plaintiff's reputation as to proper moral conduct, and
 - The identity, including name and address, of each person who has any knowledge of the plaintiff's reputation for proper moral conduct.

49. Is it the defendant's contention, allegation or belief that the defendant was entrapped, that is, lured into committing sexual intercourse with the plaintiff?
50. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- A description of each aspect of any such entrapment,
 - The name, address and any relationship to the plaintiff and the defendant of the person luring the defendant, and
 - The name and address of each person who has any knowledge of any such entrapment.
51. Is it the defendant's contention, allegation or belief that there was a lack of penetration during sexual intercourse by the defendant with the plaintiff?
52. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- The degree of penetration, whether full, half, slight, none or other,
 - The degree of the defendant's erection, whether fully erect, semierect, flaccid, or other, and
 - The length of time in minutes that the defendant had to accomplish penetration.
53. Is it the defendant's contention, allegation or belief that, at the time of the alleged occurrence, the defendant was impotent?
54. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- A description of the defendant's impotent condition,
 - The source of the defendant's condition of impotence, including physical disability, intoxication, drug use, fatigue or other, and
 - The name and address of each medical professional who will support the defendant's claim of impotence.
55. Is it the defendant's contention, allegation or belief that the defendant was insane at the time of the alleged occurrence?
56. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, including:
- A description of each aspect of the defendant's insanity,
 - The cause or basis of any such insanity,
 - The defendant's inability to distinguish right from wrong,
 - A description of the defendant's irresistible impulse where the actions of the defendant could not be controlled, and
 - How and to what extent the defendant's unlawful act was the product of any mental defect or disease.
57. The name and address of each medical professional who will support the defendant's claim of impotence.
58. Is it the defendant's contention, allegation or belief that the defendant's loss of memory of the facts of the alleged occurrence was due to intoxication?

59. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
- a. The quantity of alcohol consumed,
 - b. The quantity of drugs consumed,
 - c. The place where the defendant drank or ingested any alcohol or drug, and
 - d. The name and address of each witness with knowledge of any such alcohol or drug intoxication.