

## Property Distribution — Unmarried Cohabitants.

## 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 or as a consequence of the cohabitation of the parties as described in the plaintiff's complaint.

As used in these interrogatories, the words "cohabitation" and "cohabit" shall mean and refer to the living together of the plaintiff and the defendant.

1. Please identify yourself by name, stating the following:
  - a. The current name you are using,
  - b. All previous names you have used,
  - c. All nicknames you have used,
  - d. All aliases you have used,
  - e. All various spellings of each name stated above.
2. Please state your age, including:
  - a. Your date of birth,
  - b. Your age when cohabitation began.
3. Please state as accurately as possible each of your addresses, including:
  - a. Your current residential addresses,
  - b. Your addresses during cohabitation,
  - c. Your addresses prior to cohabitation,
  - d. The dates you lived at each of the addresses listed above.
4. Please identify your status when cohabitation began, including:
  - a. Your marital status,
  - b. Your financial status, including your net worth,
  - c. Your professional or employment status,
  - d. Your salary or wages earned and other income received,
  - e. Your job advancement opportunities and earning capacity,
  - f. Your degrees earned and education completed or in progress,
  - g. Your custody of children, identify each child by name and age,
  - h. Your health status.

5. Please provide the names and ages of your children, including:
  - a. The dates of birth of each child,
  - b. Each child's age at his or her last birthday,
  - c. Whether you have had custody during cohabitation,
  - d. Each child's age when cohabitation began,
  - e. The dates when each child's cohabitation began,
  - f. The names of each child's biological parents.
6. Please state the names of each person in your household, including:
  - a. Each person's relationship to you,
  - b. The reason for each person's presence in your household,
  - c. The date when each person joined your household,
  - d. The duration, giving dates, of each person's presence in your household.
7. Please provide information on your household pets, including:
  - a. The type and age of each pet,
  - b. The name of the owner of each pet,
  - c. The name of each caretaker of each pet.
8. Please state the names of your family members, including:
  - a. The current residential address of your family members,
  - b. The degree of each family member's involvement in your household during cohabitation.
9. Please state the duration of your cohabitation, including:
  - a. The date cohabitation began,
  - b. Each place cohabitation occurred,
  - c. Each date cohabitation ended, including resumptions.
10. Please state the circumstances under which your cohabitation began, including:
  - a. The name of the party who suggested cohabitation,
  - b. Each reason cohabitation was suggested,
  - c. Your willingness to cohabit,
  - d. Any reservations you had about cohabitation,
  - e. Any special circumstances present at the commencement of your cohabitation.

11. Please describe and explain the nature and extent of your cohabitation, including:
  - a. Whether it was a sexual relationship (mates/partners),
  - b. Whether it was a caretaker relationship, and if so, the name of the caretaking person, the name of the person needing care and the reasons the person needed care,
  - c. Whether it was a roommate relationship,
  - d. Whether it was a social companion relationship.
12. Please state whether either party expected financial support during cohabitation, and state why this expectation existed.
13. Please state whether either party expected financial support during his or her lifetime, and state why this expectation existed.
14. Please state whether either party expected an inheritance from the other party, and state why this expectation existed.
15. Please state whether either party expected a transfer of real property from the other party, and state why this expectation existed.
16. Please state whether either party expected to have pooled financial resources or access to funds from the other party, and state why this expectation existed.
17. Please state whether either party expected to have services provided by the other party, and state what these services were and why this expectation existed.
18. Please state whether either party expected to enter into a business partnership with the other party, and state why this expectation existed.
19. Please state whether either party expected the other to make financial and service contributions to the business partnership with the other party, and state why this expectation existed.
20. Please state whether either party expected the other to jointly assume financial responsibility for personal and business debt, and state why this expectation existed.
21. Please state whether either party expected the other to give up or reduce his or her outside employment, and state why this expectation existed.
22. Please state whether either party expected the other to give up or obtain an education, stating what degree was given up or to be obtained, and state why this expectation existed.
23. Please state whether either party expected the other to travel with him or her, stating the nature and frequency of travel expected, and state why this expectation existed.
24. Please state whether either party expected the other to make a gift or not make a gift of the services/contributions to the cohabitation and/or business partnership and state why this expectation existed.
25. Please state any other expectations of the parties, and state why these expectations existed.
26. Please state whether the parties held out to the public that the parties were married or were partners, indicating such awareness by the public.
27. Please state whether the parties held out to the public that the parties were living together, indicating such awareness by the public.
28. Please state whether the parties held out to their employers, coworkers or employees that the parties were married or were partners, indicating such awareness by these persons.
29. Please state whether the parties held out to their family members that the parties were married or were partners, indicating such awareness by these persons.

30. Please state whether the parties held out to their bankers or financial advisors that the parties were married or were partners, indicating such awareness by these persons.
31. Please state whether the parties held out to their friends that the parties were married or were partners, indicating such awareness by these persons.
32. Please state whether the parties held out to their neighbors that the parties were married or were partners, indicating such awareness by these persons.
33. Please state whether the parties held out to any religious leader and/or congregation members that the parties were married or were partners, indicating such awareness by these persons.
34. Please state whether the parties held out to their attorneys that the parties were married or were partners, indicating such awareness by these persons.
35. Please state whether the parties held out to their doctors and other health care providers and insurers that the parties were married or were partners, indicating such awareness by these persons.
36. Please state whether the parties held out to their co-members or associates at any club, association or organization to which the parties belong that the parties were married or were partners, indicating such awareness by these persons.
37. Please state whether the parties held out to any other persons that the parties were married or were partners, indicating such awareness by these persons.
38. Please describe and explain all facts relating to any written agreements pertaining to your cohabitation, including:
  - a. The facts known to you to establish the existence of any written agreement,
  - b. The names of the parties to each agreement,
  - c. The name of the person who prepared the agreement, who engaged and paid the preparer and the relationship of the preparer to each of the parties.
39. Please state the circumstances surrounding each written agreement, including:
  - a. The name of the party suggesting the agreement,
  - b. The reason(s) for suggesting the agreement,
  - c. Any reluctance on the part of either party to entering into the agreement,
  - d. The reasons for each party's reluctance,
  - e. The reasons for each party's acceptance of the agreement,
  - f. Whether the agreement was insisted upon by either party,
  - g. Whether you allege that fraud or misrepresentation was involved in the formation of the agreement, citing all facts of such fraud or misrepresentation,
  - h. The degree to which you assented to the agreement,
  - i. Other than the above, any other relevant circumstances surrounding the agreement.
40. Please state all terms of any written agreement, including:
  - a. The duration of each agreement's binding force,
  - b. The rights and duties of all parties,
  - c. A description of all real property affected by the agreement,
  - d. A description of all personal property affected by the agreement,
  - e. Any expected inheritances affected by the agreement,

- f. Any expected retirement/pension funds affected by the agreement,
- g. Any earnings affected by the agreement,
- h. Any unexpected windfalls/winnings affected by the agreement,
- i. All other terms of the agreement.

41. Please state the adequacy of consideration for the agreement, including:

- a. All services or behavior required of each party to the agreement,
- b. All economic benefits to each party under the agreement,
- c. All economic hardships to each party under the agreement,
- d. All behavior or acts which are forbidden or restricted by the agreement,
- e. All other types of consideration offered or required for the agreement.

42. Please state the degree to which there was public knowledge of each agreement, including:

- a. The names of witnesses to the preparation of the agreement,
- b. The names of witnesses to the final agreement,
- c. The names of witnesses to the parties' discussions of the agreement,
- d. The facts of public knowledge of the agreement.

43. Please provide information about the performance of the agreement, including:

- a. The name(s) of all performing parties,
- b. A complete description of each party's performance,
- c. The dates of each party's performance,
- d. The facts of each party's performance,
- e. The names of witnesses to each party's performance,
- f. All other relevant information about the performance of the agreement.

44. Please provide information about any and all alleged breaches of the agreement, including:

- a. The name(s) of all breaching parties,
- b. Whether you were evicted from the cohabitation residence,
- c. Whether you abandoned the other party,
- d. Whether you eliminated or reduced financial support of the other party,
- e. Whether you retained any jointly owned property,
- f. Whether you disposed of jointly owned property,
- g. Whether you misappropriated jointly held funds,
- h. The circumstances surrounding each breach,
- i. The date of the original breach,
- j. The dates of all subsequent breaches,
- k. Whether the parties discussed any or all breach(es),
- l. Whether the parties amended the agreement's terms following a breach,
- m. All promises and commitments made by you following a breach,
- n. Whether you forgave any or all breaches,
- o. The facts offered of each breach,
- p. The names of witnesses to your alleged breaching conduct,
- q. All other relevant information about all breaches of the agreement.

45. Please describe and explain all facts relating to any oral agreements pertaining to your cohabitation, including:
- The facts known to you to establish the existence of any oral agreement,
  - The names of the parties to each agreement.
46. Please state the factual background surrounding each oral agreement, including:
- The name of the party suggesting the agreement,
  - The reason(s) for suggesting the agreement,
  - Any reluctance on the part of either party to entering into the agreement,
  - The reasons for each party's reluctance,
  - The reasons for each party's acceptance of the agreement,
  - Whether the agreement was insisted upon by either party,
  - Whether you allege that fraud or misrepresentation was involved in the formation of the agreement, including all facts of such fraud or misrepresentation,
  - The degree to which you assented to the agreement,
  - The reasons why the agreement was never written and formalized,
  - Whether the parties ever discussed formalizing the agreement,
  - Other than the above, any other relevant circumstances surrounding the agreement.
47. Please state all terms of any oral agreement, including:
- The duration of each agreement's binding force,
  - The rights and duties of all parties,
  - A description of all real property affected by the agreement,
  - A description of all personal property affected by the agreement,
  - Any expected inheritances affected by the agreement,
  - Any expected retirement/pension funds affected by the agreement,
  - Any earnings affected by the agreement,
  - Any unexpected windfalls/winnings affected by the agreement,
  - All other terms of the oral agreement.
48. Please state the adequacy of consideration for the oral agreement, including:
- All services or behavior required of each party to the agreement,
  - All economic benefits to each party under the agreement,
  - All economic hardships to each party under the agreement,
  - All behavior or acts which are forbidden or restricted by the agreement,
  - All other types of consideration offered or required for the agreement.
49. Please state the degree to which there was public knowledge of each oral agreement, including:
- The names of witnesses to the parties' discussions of the agreement,
  - The facts of all public knowledge of the oral agreement.

50. Please provide information about the performance of the oral agreement, including:
- The name(s) of all performing parties,
  - A complete description of each party's performance,
  - The dates of each party's performance,
  - The facts of each party's performance,
  - The names of witnesses to each party's performance,
  - All other relevant information about the performance of the agreement.
51. Please provide information about any and all alleged breaches of the oral agreement, including:
- The name(s) of all breaching parties,
  - Whether you were evicted from the cohabitation residence,
  - Whether you abandoned the other party,
  - Whether you eliminated or reduced financial support of the other party,
  - Whether you retained any jointly owned property,
  - Whether you disposed of jointly owned property,
  - Whether you misappropriated jointly held funds,
  - The circumstances surrounding each breach,
  - The date of the original breach,
  - The dates of all subsequent breaches,
  - Whether the parties discussed any or all breaches,
  - Whether the parties amended the agreement's terms following a breach,
  - All promises and commitments made by you following a breach,
  - Whether you forgave any or all breaches,
  - The facts available as to each breach,
  - The names of witnesses to your alleged breaching conduct,
  - All other relevant information about all breaches of the agreement.
52. Please provide information about opportunities lost as a result of any written agreement, including:
- Any and all employment forsaken, lost or reduced by each party,
  - Any and all education forsaken, discontinued or reduced by each party,
  - Any and all training forsaken, discontinued or reduced by each party,
  - Any and all relationships discontinued, lost or reduced by each party,
  - Any party's failure to have children,
  - All other opportunities lost as a result of the cohabitation.
53. For each lost opportunity referred to in the answer to the previous interrogatory, please state the reason that any agreement prevented either party from taking advantage of the opportunity.
54. For each lost opportunity referred to in the answers to the two previous interrogatories, please state the actions taken by either party to discourage or prevent the other party from taking advantage of the opportunity.
55. Please state all facts known to you and related to any opportunities lost by either party on account of any written agreement.

56. Please provide information about opportunities lost as a result of an oral agreement, including:
- Any and all employment forsaken, lost or reduced by each party,
  - Any and all education forsaken, discontinued or reduced by each party,
  - Any and all training forsaken, discontinued or reduced by each party,
  - Any and all relationships discontinued, lost or reduced by each party,
  - Any parties' failure to have children,
  - All other opportunities lost as a result of the cohabitation.
57. For each lost opportunity referred to in the answer to the previous interrogatory, please state the reason that any oral agreement prevented either party from taking advantage of the opportunity.
58. For each lost opportunity referred to in the answers to the two previous interrogatories, please state the actions taken by either party to discourage or prevent the other party from taking advantage of the opportunity.
59. Please state all facts known to you related to any opportunities lost by either party on account of any oral agreement.
60. Please state as accurately as possible all addresses, including:
- All addresses of residences occupied during cohabitation,
  - The duration of stay at each residence during cohabitation.
61. Please provide information about residences owned by nonparties, including:
- The name and address of the nonparty owner of each residence occupied during the cohabitation,
  - The name of the landlord on each lease,
  - The names of the tenants on each lease,
  - The amount of monthly rent paid under each lease,
  - The amount contributed monthly by each party,
  - The facts available to support each party's contribution,
  - The source of the funds for each party's contribution.
62. Please provide information about residences owned by the parties, including:
- The name and address of the party owner of each residence owned during cohabitation,
  - The names on the title to each residence.
63. Please state all facts relating to all residences owned by any party to the cohabitation, including:
- Price paid for the residence,
  - Source of funds used for the purchase,
  - Name and address of lender for each purchase,
  - Amount borrowed for each purchase,
  - Amount contributed to each purchase by each party,
  - Facts available as to each party's contribution.

64. Please state all facts relating to all monthly mortgage payment amounts paid on residences owned by any party to the cohabitation, including:
- Monthly amount contributed by each party,
  - Facts available as to each party's contribution,
  - The source of the monthly contribution of each party.
65. Please state all facts relating to the sale of any residences owned by any party to the cohabitation, including:
- The price received on each sale,
  - The net amount realized on each sale,
  - The current location of net proceeds from each sale,
  - The uses of the proceeds (debts/purchases/investments),
  - A description of the distribution of the proceeds among the parties.
66. Please provide information about each party's monetary contributions to the relationship, including:
- The dates of each party's contributions,
  - The source of funds for each contribution,
  - Whether the contributions were required by agreement or voluntary.
67. Please describe the nature of each party's monetary contributions to cohabitation, including:
- All contributions to real property purchases,
  - All contributions to personal property purchases,
  - All contributions for household expenses,
  - All contributions to health insurance, health care providers and medications,
  - All contributions to retirement funds and plans,
  - All contributions to entertainment and travel,
  - All contributions for clothing,
  - All contributions for personal expenses,
  - All contributions for education expenses,
  - All contributions to parties' family members' care,
  - All assumptions of household debt,
  - All other monetary contributions.
68. If contributions were required by any agreement between the cohabiting parties, please state:
- Whether the agreement terms were adhered to,
  - If not, the reasons for all breaches,
  - A description of each breach,
  - Whether any breach was forgiven by the other party.

69. If the agreement was breached, please state whether the terms of the agreement were amended regarding monetary contributions, including:
- A complete description of all changes,
  - The adequacy of the consideration for changes,
  - The name of the party suggesting changes,
  - The circumstances surrounding the changes,
  - Whether the amended terms were adhered to,
  - If the terms were not adhered to, the reasons for all breaches,
  - A description of all breaches,
  - Whether any breaches were forgiven by the other party.
70. Please state the facts relating to all monetary contributions, including:
- Tax returns,
  - Financial statements,
  - Loan documents,
  - Bank account records,
  - Other proof of monetary contributions to the relationship.
71. Please provide information about your monetary contributions to your business interests, including:
- A description of the business, including the ownership structure of the business, the financial status of the business and the business titles of the parties,
  - The dates of all your contributions,
  - The source of funds for each of your contributions,
  - Whether each of your contributions was required by agreement or was voluntary.
72. Please describe the nature and amount of each of your monetary business contributions, including:
- All contributions for capital or start-up costs,
  - All contributions to real property purchases,
  - All contributions to equipment purchases,
  - All contributions to fixtures purchases,
  - All contributions for business expenses,
  - All contributions to insurance providers/plans,
  - All contributions to retirement funds/plans,
  - All contributions to business entertainment/travel,
  - All contributions for uniforms,
  - All contributions for business expenses,
  - All contributions for training or business/professional education,
  - All assumption of business debt,
  - All other monetary business contributions.

73. If your business contributions were required by an agreement, please state:
- Whether each agreement's terms were adhered to,
  - If not, the reasons for all breaches,
  - A description of each breach,
  - Whether any breach was forgiven by the other party.
74. If your agreement was breached, please state whether terms of the agreement were amended regarding monetary contributions to business interests, including:
- A complete description of all changes,
  - The adequacy of the consideration for changes,
  - The name of the party suggesting changes,
  - The circumstances surrounding the changes.
75. If your agreement's terms were amended, please state:
- Whether the amended terms were adhered to,
  - If not, the reasons for each breach,
  - If not, a description of each breach,
  - If not, whether any breach was forgiven.
76. Please state the facts available as to all monetary business contributions, including:
- Incorporation documents,
  - Partnership agreements,
  - Tax returns,
  - Financial statements,
  - Loan documents,
  - Bank account records,
  - Other proof of business contributions.
77. Please state the facts about adult care provided by you, including:
- Whether adult care was required by agreement or voluntary,
  - The name of the person for whom care was provided,
  - A description of the adult care duties provided,
  - The time periods involved in the adult care,
  - The reasons for the adult care,
  - Any special skills involved in providing the adult care,
  - All costs incurred by each party in providing adult care,
  - A description of all required travel to doctors or appointments,
  - All medicines administered,
  - All other relevant adult care information.
78. Please state the facts about child care provided by you, including:
- Whether child care was required by agreement or voluntary,
  - The name of the person for whom care was provided,

- c. A description of the child care duties provided,
- d. The time periods involved in the child care,
- e. The reasons for the child care,
- f. Any special skills involved in providing the child care,
- g. All costs incurred by each party in providing child care,
- h. A description of all required travel to doctors and appointments,
- i. A description of all required travel to school and religious activities,
- j. A description of all required travel to other caregivers, tutors or lessons,
- k. A description of all required travel to friends/entertainment,
- l. All medicines administered,
- m. All other relevant child care information.

79. Please provide information about homemaking services provided by you, including:

- a. Whether homemaking was required by any agreement or was voluntary,
- b. Your responsibility for bill paying,
- c. Your responsibility for home decorating,
- d. Your responsibility for home cleaning,
- e. Your responsibility for food shopping and meal preparation,
- f. Your responsibility for clothes shopping and maintenance,
- g. Your responsibility for yard work and snow and leaf removal,
- h. Your responsibility for gardening,
- i. Your responsibility for birthday, holiday and social entertaining and correspondence,
- j. Your responsibility for home maintenance and repair,
- k. The circumstances under which the homemaker relationship began,
- l. The time periods involved in the homemaking duties,
- m. Any public awareness of the homemaker relationship,
- n. Any special skills involved in providing the homemaking,
- o. All housekeeping costs incurred by each party,
- p. Other relevant information regarding homemaking services.

80. Please provide information about your sexual relationship with the opposing party, including:

- a. A description of the nature of any portion of a written or oral agreement relating to sexual services,
- b. A description of the sexual relationship,
- c. The circumstances under which the sexual relationship started,
- d. Any monetary compensation for sexual services involved,
- e. Any public awareness of the parties' sexual relationship.

81. Please provide information about social companionship services provided by you for the opposing party, including:

- a. Whether social companionship services were required by agreement or were voluntary,
- b. A description of the relationship and companionship duties provided,
- c. The time periods involved in the companionship,

- d. The circumstances under which the companionship began,
- e. A description of the home entertainment provided as companion,
- f. A description of business entertainment provided as companion,
- g. Any special skills involved in providing the companionship,
- h. All costs incurred in providing the companionship,
- i. A description of all required travel as social companion,
- j. Any public awareness of the social companionship relationship,
- k. All other relevant companionship information.

82. Please describe any business partnership services provided by you, including:

- a. Whether business partnership services were required by agreement or were voluntary,
- b. A description of the business relationship and duties provided, including advice and counsel and unpaid labor,
- c. The time periods involved in the business relationship,
- d. The circumstances under which the business relationship began,
- e. Any special skills involved in providing the business relationship,
- f. All costs incurred in providing the business relationship,
- g. Any public awareness of the business relationship,
- h. All other relevant business relationship information.

83. Please describe and explain the facts available to establish all nonmonetary contributions, including:

- a. The names of witnesses to all nonmonetary contributions,
- b. A description of all recipients of services,
- c. A description of all notes or thank you statements from recipients of services.

84. Please state the assets held by you when the cohabitation began, including:

- a. All real property in which you had an ownership interest,
- b. All personal property you owned,
- c. All cash/securities you held,
- d. All financial and other investments,
- e. Any trust fund from which you received income,
- f. All income/wages/other income sources which you had,
- g. All intangibles/expectancies which you had,
- h. All other assets in which you held an interest,
- i. The value of each asset when the cohabitation began,
- j. The current value of each asset,
- k. A description and explanation of the ownership and value of each asset.

85. Please provide information about any of your assets which were contributed to the cohabitation, including:

- a. A description of each asset,
- b. The date and timing of the contribution of each asset,
- c. Whether the contributions were made by agreement or were voluntary,

- d. Whether you intended to make a gift of the asset contributed,
- e. An explanation of the contribution and your intent regarding the contribution.

86. Please state whether you knew of ownership of the assets held by the other party when the cohabitation began, including:

- a. A description of your knowledge,
- b. A description of each asset specifically referred to in any written agreement,
- c. A description of each asset specifically referred to in discussions of the cohabitation or in any oral agreement concerning the cohabitation.

87. Please describe all of your contentions and allegations concerning all assets in dispute at the end of the cohabitation, including current ownership and possession of assets:

- a. Real property,
- b. Personal property,
- c. Cash and securities,
- d. Investments,
- e. Income, wages and/or other income,
- f. Any other assets,
- g. Any dispute about the current value of each asset,
- h. Any dispute about the original ownership of each asset,
- i. Any dispute about the original value of each asset,
- j. Any misconduct or malfeasance you allege regarding each asset,
- k. Any promises made or any expectancy regarding each asset,
- l. The facts you rely on regarding each dispute.

88. Please describe all of your contentions and allegations about the business assets in which you held an ownership interest when the cohabitation began, including:

- a. Real property,
- b. Personal property/equipment/fixtures,
- c. Cash/securities,
- d. Investments,
- e. Other assets,
- f. The value of the your business assets when the cohabitation began,
- g. The current value of your business assets,
- h. The facts you rely on regarding ownership, possession and value of your business assets.

89. Please provide information about any of your business assets which were contributed to the cohabitation, including:

- a. A description of the assets and the timing of their contribution,
- b. Whether the contribution was made under an agreement or was voluntary,
- c. Whether you intended to make a gift of the asset,
- d. The facts you rely on regarding the contributions of each asset.

90. Please state whether the other party knew of your ownership of the business assets when cohabitation began, including:
- The facts you rely on as to such knowledge,
  - Any business asset specifically referred to in any written agreement,
  - Any asset specifically referred to in discussions of any oral agreement.
91. Please provide information about any contentions or allegations made by you regarding business assets in dispute when the cohabitation ended, including:
- A description of the business asset,
  - Any dispute about the asset's current value,
  - Any dispute about the asset's original ownership,
  - Any dispute about the original value of the asset,
  - Any misconduct or malfeasance you allege regarding the asset,
  - Any promises made or any expectancy regarding the asset,
  - The facts you rely on as to ownership, possession and value of the asset.
92. Please provide all facts about any personal debts incurred by you during the cohabitation, including:
- A description of each debt,
  - The date(s) incurred,
  - The reason each debt was incurred,
  - The names of the parties responsible for the payment of each debt,
  - Whether you agreed to incur the debt,
  - Whether one party obligated the other without prior permission,
  - The specific amount of the debt in dispute.
93. Please provide all facts about any business debts incurred by you during the cohabitation, including:
- A description of each debt,
  - The date(s) incurred,
  - The reason each debt was incurred,
  - The names of the parties responsible for payment of each debt,
  - Whether you agreed to incur the debt,
  - Whether one party obligated the other without prior permission,
  - The specific amount of the debt in dispute.
94. Please provide the facts of your knowledge regarding allegations of your alleged improper conduct during cohabitation, including:
- Any incidents of physical abuse,
  - Any incidents of emotional abuse,
  - Any financial misconduct,
  - Any incidents of infidelity,
  - Any failure to work or earn income,

- f. Any failure to search for employment,
- g. Any failure to support the goals and efforts of the other party,
- h. Any absences or poor performance as a parent,
- i. Any absenteeism or abandonment,
- j. Any failure to assist in maintaining the household,
- k. Any incidents or history of drug abuse,
- l. Any incidents or history of alcoholism,
- m. Any incidents of lack of consortium,
- n. Any interference with familial, social or business relationships,
- o. Any other improper behavior alleged.

95. If any of your answers to the preceding interrogatory are in the affirmative, please identify all facts you rely on in support of your conduct, including:

- a. Any medical records,
- b. Any psychologist's reports,
- c. Any children's school reports,
- d. Any drug and alcohol rehabilitation records,
- e. Any bank statements,
- f. Any tax returns,
- g. Any statements of children,
- h. Any statements of witnesses,
- i. Any business records.

96. Please provide all facts on which you rely that your conduct during cohabitation was appropriate and proper, including:

- a. Regular employment,
- b. Excellent performance as a parent,
- c. Regular maintenance of home,
- d. Regular shopping for household,
- e. Regular meal preparation,
- f. Regular attendance at family functions,
- g. Regular attendance at religious services,
- h. Regular attendance at school functions,
- i. Regular household bill payment,
- j. Conservation of financial, business and household assets,
- k. Generation of business contacts and clients,
- l. Other proper conduct.

97. If any of your answers to the preceding interrogatory are in the affirmative, please identify all facts you rely on in support of your conduct, including:

- a. Any medical records,
- b. Any psychologist's reports,
- c. Any children's school reports,
- d. Any drug and alcohol rehabilitation records,
- e. Any bank statements,
- f. Any tax returns,
- g. Any statements of children,
- h. Any statements of witnesses,
- i. Any business records.