

Remarriage of Defendant Payor.

1. During the past three years, has the defendant remarried after the termination of the defendant's marriage to the plaintiff?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to such remarriage:
 - a. The date and place,
 - b. The full name of the defendant's new spouse, and
 - c. The name of the person who performed the marriage ceremony.
3. If the defendant was remarried within the past three years, please state as to the employment income of the defendant's new spouse:
 - a. The average annual income from employment for the most recent three-year period,
 - b. The name and address of the new spouse's employer,
 - c. The new spouse's job title or position, and
 - d. The inclusive dates of the new spouse's employment with the current employer, indicating the date when employment began and currently continues or ended.
4. If the defendant was remarried within the past three years, please state as to the sources of income of the defendant's new spouse other than employment income, including, but without limitation, any trust fund, investments, inheritance, welfare or other:
 - a. A description of each source of income, including name and address, and
 - b. The average annual income from each source.
5. If the defendant was remarried within the past three years, please state as to any financial commitment of support to any former spouse of the defendant's new spouse:
 - a. The name and address of the former spouse of the defendant's new spouse,
 - b. The amount, on an annual, monthly or weekly basis, of any such support,
 - c. The frequency of any such support payment,
 - d. The length of time any such support payments will be required, and
 - e. The substance of the terms of any agreement requiring any such support.
6. If the defendant was remarried within the past three years, please state as to any financial or other commitment by the defendant or the defendant's new spouse to any child of the defendant's new spouse:
 - a. The name, address and date of birth of each such child,
 - b. The amount, on an annual, monthly or weekly basis, of any such financial support,
 - c. The nature and extent of any other commitment to any such child by the defendant's new spouse,
 - d. The frequency of any such financial support payments,
 - e. The length of time any such support payments will be required, and
 - f. The substance of the terms of any agreement requiring any such support.

7. If the defendant was remarried within the past three years, please state as to any medical care obligation, commitment or payment by or on behalf of the defendant's new spouse:
 - a. The amount of any such medical care obligation, commitment or payment,
 - b. The medical care problem giving rise to or creating any such obligation, commitment or payment,
 - c. The name and address of the payee of any medical care payment,
 - d. The frequency of any medical care payment, and
 - e. The length of time any such medical care payment will be required.
8. If the defendant was remarried within the past three years, please state as to any debt which is the obligation of the defendant's new spouse:
 - a. The amount of any such debt,
 - b. A description of any such debt,
 - c. The name and address of each creditor,
 - d. The background and origin of any such debt,
 - e. The amount of any debt payment,
 - f. The frequency of any such debt payment, and
 - g. The length of time any such debt payment will be required.
9. As a result of the defendant's remarriage, please describe the defendant's new financial situation resulting from any change in employment:
 - a. A description of each change in employment and the reason therefore,
 - b. The name and address of the defendant's new employer,
 - c. The defendant's new job title, position and duties with the new employer,
 - d. The defendant's new salary, bonus and other financial benefits of such new employment,
 - e. Any additional financial obligation undertaken by the defendant as a result of any such change in employment, and
 - f. The net financial effect to the defendant of such change in employment compared to the defendant's prior employment.
10. As a result of the defendant's remarriage, please describe the defendant's new financial situation resulting from any relocation:
 - a. A description of each change in the defendant's financial situation as a result of any relocation,
 - b. The new address,
 - c. The reason and purpose of any relocation,
 - d. Any additional financial obligation undertaken by the defendant as a result of any relocation, and
 - e. The net financial effect to the defendant of such change in location compared to the defendant's prior location.
11. As a result of the defendant's remarriage, please describe the defendant's new financial situation resulting from the purchase of a house:

- a. The location of the house,
 - b. A description of each change in the defendant's financial situation as a result of the purchase of a house,
 - c. The reason and purpose of the purchase of a house,
 - d. Any additional financial obligation undertaken by the defendant as a result of the purchase of a house, and
 - e. The net financial effect to the defendant of the purchase of a house compared to the defendant's prior ownership of a house.
12. As a result of the defendant's remarriage, please describe the defendant's new financial situation resulting from any new financial obligations or debts:
- a. A description of each new financial obligation or debt,
 - b. The name and address of each new creditor relating to each new financial obligation or debt,
 - c. The reason and purpose of any new financial obligation or debt, and
 - d. The net financial effect of the defendant's financial obligations and debts compared to the defendant's prior financial obligations and debts before the defendant's remarriage.
13. As a result of the defendant's remarriage, please describe the defendant's additional obligations to children:
- a. The name, date of birth and age of each child,
 - b. The name and address of each parent of each child,
 - c. A description of all custody arrangements for each child, and
 - d. A description of all the defendant's obligations to each child.
14. As a result of the defendant's remarriage, please describe the financial contributions made by the defendant's new spouse, including, but without limitations, the following:
- a. Defendant's household expenses,
 - b. Defendant's child care expenses,
 - c. Defendant's medical care expenses,
 - d. Defendant's personal expenses,
 - e. Defendant's transportation expenses,
 - f. Defendant's entertainment expenses, and
 - g. Defendant's other expenses.
15. As a result of the defendant's remarriage, please describe the additional expenses associated with the defendant's new spouse, including, but without limitation, the following:
- a. Household expenses,
 - b. Child care expenses
 - c. Medical care expenses,
 - d. Personal expenses,
 - e. Transportation expenses,
 - f. Entertainment expenses, and

g. Other expenses.

Defendant Payor's Cohabitation.

1. Since the termination of the defendant's conjugal relationship with the plaintiff, has the defendant cohabited with or been living with any person of the opposite sex?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to any such person:
 - a. The name and address of each such person,
 - b. Whether the defendant's relationship with any such person was a sexual relationship,
 - c. Whether the defendant's relationship with any such person was a financial relationship,
 - d. Whether the defendant's relationship with any such person was a platonic relationship, and
 - e. The inclusive dates of such relationship, giving the date of the beginning and the ending, if any, of such relationship.
3. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the living arrangement between the defendant and any such person:
 - a. The amount of time spent together,
 - b. The amount of time spent separately,
 - c. Joint activities pursued together,
 - d. The amount of time at work,
 - e. The average number of nights per week of sleeping together, and
 - f. The average number of meals per week of eating together.
4. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the appearance of living together:
 - a. Whether the defendant publicly informed others of the address of any such person, and
 - b. Whether the defendant publicly informed others of the telephone number of any such person.
5. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of expenses and costs between the defendant and any such person:
 - a. How and in what manner are the household expenses and costs shared, and
 - b. The amount paid by each toward the expenses and costs of living together.
6. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of household expenses between the defendant and any such person:

- a. How and in what manner any such expenses are shared, and
 - b. The amount paid by each toward any such expenses.
7. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of child care expenses between the defendant and any such person:
 - a. How and in what manner any such expenses are shared, and
 - b. The amount paid by each toward any such expenses.
8. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of entertainment expenses between the defendant and any such person:
 - a. How and in what manner any such expenses are shared, and
 - b. The amount paid by each toward any such expenses.
9. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of transportation expenses between the defendant and any such person:
 - a. How and in what manner any such expenses are shared, and
 - b. The amount paid by each toward any such expenses.
10. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of medical expenses between the defendant and any such person:
 - a. How and in what manner any such expenses are shared, and
 - b. The amount paid by each toward any such expenses.
11. If the defendant has been cohabiting with or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of other expenses between the defendant and any such person:
 - a. How and in what manner any such expenses are shared, and
 - b. The amount paid by each toward any such expenses.
12. If the defendant has been cohabiting or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of income between the defendant and any such person:
 - a. How and in what manner any income is shared,
 - b. A description of each source of income,
 - c. The amount of income received by each, and
 - d. The amount of income shared by each.

13. If the defendant has been cohabiting or living with any person of the opposite sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to any agreement entered into jointly by the defendant and any such person:
- A description of all oral agreements,
 - A description of all written agreements,
 - Each subject matter of each such agreement,
 - Any financial amounts involved in each such agreement, and
 - Each responsibility of each party for various subject matters of each such agreement.
14. If the defendant has been cohabiting or living with any person of the opposite sex since the termination of the conjugal relationship with the plaintiff, please describe all promissory notes or other credit instruments such as credit cards signed by the defendant and any such person:
- A description of all notes or other credit instruments,
 - The type of each note or credit instrument,
 - The purpose of each note or credit instrument,
 - The amount of money involved in each note or credit instrument, and
 - The responsibility of each party as to each note or credit instrument.
15. Since the termination of the defendant's conjugal relationship with the plaintiff, has the defendant cohabited with or been living with any person of the same sex?
16. If your answer to the preceding interrogatory is in the affirmative, please state as to any such person:
- The name and address of each such person,
 - Whether the defendant's relationship with any such person was a sexual relationship,
 - Whether the defendant's relationship with any such person was a financial relationship,
 - Whether the defendant's relationship with any such person was a platonic relationship, and
 - The inclusive dates of such relationship, giving the date of the beginning and the ending, if any, of such relationship.
17. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the living arrangements between the defendant and any such person:
- The amount of time spent together,
 - The amount of time spent separately,
 - Joint activities pursued together,
 - The amount of time at work,
 - The average number of nights per week of sleeping together,
 - The average number of meals per week of eating together.

18. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the appearance of living together:
- Whether the defendant publicly informed others of the address of any such persons, and
 - Whether the defendant publicly informed others of the telephone number of any such person.
19. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of expenses and costs between the defendant and any such person:
- How and in what manner are the household expenses and costs shared, and
 - The amount paid by each toward the expenses and costs of living together.
20. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of household expenses between the defendant and any such person:
- How and in what manner any such expenses are shared, and
 - The amount paid by each toward any such expenses.
21. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of child care expenses between the defendant and any such person:
- How and in what manner any such expenses are shared, and
 - The amount paid by each toward any such expenses.
22. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of entertainment expenses between the defendant and any such person:
- How and in what manner any such expenses are shared, and
 - The amount paid by each toward any such expenses.
23. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of transportation expenses between the defendant and any such person:
- How and in what manner any such expenses are shared, and
 - The amount paid by each toward any such expenses.
24. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of medical expenses between the defendant and any such person:
- How and in what manner any such expenses are shared, and

- b. The amount paid by each toward any such expenses.
25. If the defendant has been cohabiting with or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of other expenses between the defendant and any such person:
- a. How and in what manner any such expenses are shared, and
- b. The amount paid by each toward any such expenses.
26. If the defendant has been cohabiting or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to the sharing of income between the defendant and any such person:
- a. How and in what manner any income is shared,
- b. A description of each source of income,
- c. The amount of income received by each, and
- d. The amount of income shared by each.
27. If the defendant has been cohabiting or living with any person of the same sex since the termination of the defendant's conjugal relationship with the plaintiff, please state as to any agreement entered into jointly by the defendant and any such person:
- a. A description of all oral agreements,
- b. A description of all written agreements,
- c. Each subject matter of each such agreement,
- d. Any financial amounts involved in each such agreement, and
- e. Each responsibility of each party for various subject matters of each such agreement.
28. If the defendant has been cohabiting or living with any person of the same sex since the termination of the conjugal relationship with the plaintiff, please describe all promissory notes or other credit instruments such as credit cards signed by the defendant and any such person:
- a. A description of all notes or other credit instruments,
- b. The type of each note or credit instrument,
- c. The purpose of each note or credit instrument,
- d. The amount of money involved in each note or credit instrument, and
- e. The responsibility of each party as to each note or credit instrument.