

IN THE _____ COURT FOR _____ COUNTY, TENNESSEE
AT _____

_____,)
)
Plaintiff,)
)
vs.) No. _____
)
_____,)
)
Defendant.)

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

Pursuant to Rule 33.01 of the Tennessee Rules of Civil Procedure, the Plaintiff, _____ ("_____"), propounds these Interrogatories upon the Defendant, _____ ("You"). You are required to answer these interrogatories, fully, in writing, under oath, on or before _____.

If any information called for by an Interrogatory is withheld on the basis of a claim of privilege or attorney work-product, then please state the claimed basis for withholding the information, set forth the nature of the information withheld, and set forth all of the circumstances relied upon to support the withholding sufficient to allow a court to determine whether the information can be withheld.

NOTICE

Please be advised that pursuant to Rule 26.05 of the Tennessee Rules of Civil Procedure, you are required to amend your Answers to these Interrogatories if in the future you determine that either:

- (a) one of your Answers was incorrect when made; or**
- (b) one of your Answers to these interrogatories, although correct when made, is no longer correct.**

INTERROGATORIES

1. Please list every job or occupation that you have had for the past five (5) years and, for each such job or occupation, state the name and address of your employer, a brief description of your job duties, your compensation structure (base salary, bonuses, etc.), the beginning and ending dates of your involvement with the job or occupation, and the reason why your involvement with the job or occupation ceased.

If unemployed, please state the reason you are unemployed and any and all efforts made by you or on your behalf by any other person(s) to gain employment.

ANSWER:

2. Please list all educational training you have, including vocational, computer, or speciality training, all certifications, and dates received.

ANSWER:

3. Please list the total amount of annual gross income received by you from all sources to date in the current calendar year and for each of the previous three (3) years.

ANSWER:

4. For each source of income that you currently receive, including, but not limited to rental income, investment income and distributions/advances, please provide the following information: (a) a

description of the source of said income and why you are receiving said income; (b) the amount(s) that you are receiving; and (c) the date(s) on which you receive said income.

ANSWER:

5. For each source of income that you anticipate receiving at any time during the next two (2) years from the current date, please provide the following information: (a) a description of the source of said income and why you anticipate receiving said income; (b) the amount(s) that you anticipate receiving; and (c) the date(s) on which you anticipate you will receive said income.

ANSWER:

6. Please list and describe all fringe benefits received by you and/or to which you are entitled as a result of your employment and/or business interest(s), including, but not limited to, medical, dental, life, and disability insurance, company car or auto allowance, travel and expense allowance, pension and/or profit-sharing plan participation, employee stock option plan participation, and incentive compensation plan participation.

ANSWER:

7. With respect to health and dental insurance, please state the following: (a) name all persons currently listed on any health and dental insurance provided through your employment; (b) state the amount of the portion of the monthly amount attributed to the children's portion of the premium that

you pay either directly or that is deducted from your income (payments made by your employer that are not deducted from your wages and are not included as taxable income to you do not apply. Only the portion of the health insurance premium actually attributable to the children can be included in this amount. If you cannot determine and verify the specific amount of the health insurance premium that is attributable to the children, divide the total cost of the premium by the number of persons covered by the policy in order to determine a per person cost); and (c) state the dollar amount of the monthly premium that would be payable to enable your spouse to remain on your group health insurance coverage after the divorce pursuant to the Federal COBRA Statute.

ANSWER:

8. For each and every checking account maintained by you, on which you have or have had any privileges, to which you have made deposits, from which you have made withdrawals, or to/from which deposits and/or withdrawals have been made for your benefit or on your behalf, at any time during the past three (3) years, please state: (a) the name and address of the financial institution where maintained; (b) the name(s) in which the account is/was maintained; (c) the account number; (d) the balance on the date you acquired an interest or on the date of this marriage (whichever is later); (e) the current balance and (f) the sources of funds deposited into said account.

ANSWER:

9. For each and every savings account, investment club account, certificate of deposit,

money market certificate, treasury bill, mutual fund account, liquid asset account, brokerage account or like asset maintained by you or on which you have had any privileges at any time during the past three (3) years, please state: (a) the name and address of the financial institution where maintained; (b) the name(s) in which the account or certificate is or was maintained; (c) the account or certificate number; (d) the balance on the date you acquired an interest or on the date of this marriage (whichever is later); (e) the current balance or fair market value; and (f) the source of funds deposited into said account.

ANSWER:

10. For each and every individual retirement account, pension fund, profit sharing, SEP, KEOGH, 401K, deferred compensation plan or other type of defined benefit or defined contribution plan of any nature whatsoever maintained by you at any time during the past five (5) years, please state: (a) the name and address of the financial institution where maintained; (b) the name in which the account(s) is (are) titled; (c) the account number; (d) the balance/fair market value on the date you acquired an interest or on the date of this marriage (whichever is later); and (e) the current balance/fair market value.

ANSWER:

11. For all stocks, bonds and other securities currently owned by you or in which you have had an ownership interest at any time during the past three (3) years, please state for each: (a) the name of the company or entity which issued the stock, bond or other security; (b) the account number; (c) the value of your interest on the date you acquired an interest or on the date of this marriage (whichever is

later); and (d) the current fair market value of your interest.

ANSWER:

12. For every business association (whether such association is a limited partnership, sole proprietorship, joint venture, corporation or other form of business association) in which you have had an ownership interest at any time during the past five (5) years, please state for each: (a) the name and address of the business; (b) a description of the business association; (c) the date of inception for the business or the date on which you obtained an ownership interest; (d) the percentage owned by you; (e) the number of shares of stock owned by you (if incorporated); (f) the name, address and percentage owned by each other person who has an interest; (g) the dates and amounts of all capital contributions and loans made by your or your spouse, as well as the source of funds used for each such contribution and/or loan; (h) the value of your interest on the date you acquired an interest or on the date of this marriage (whichever is later); and (i) the current fair market value of your interest and the basis for your opinion of the fair market value.

ANSWER:

13. Do you have any complaints with your spouse as a spouse?

If the answer is yes, please state, with specificity, all complaints you have with your spouse, listing all specific incidents of misconduct by your spouse, and stating the names of any persons who witnessed or have any knowledge whatsoever of any of the events that you describe.

ANSWER:

14. Have you done anything during this marriage that is inappropriate for a person to do while married? If the answer is yes, please explain in detail what you have done and when you did it.

ANSWER:

15. Have you had sexual relations or any form of sexual contact with any person other than your spouse since the date of this marriage?

If the answer is yes, please state (a) the name of each person with whom you have had sexual relations or contact; (b) the date and place where the first and most recent act of sexual relations or contact occurred; (c) all gifts you have made to each such person including a description of each gift and the amount of the purchase price; and (d) all trips or outings you have taken with each such person, including the date, location and amount of expenses incurred in connection with each such trip or outing.

ANSWER:

16. Have you been on a date with anyone besides your spouse at any time since the date of this marriage? If the answer is yes, please state for each such person the following: (a) their name, (b) when you have been on a date with such person, and (c) the place(s) that you went on the date.

ANSWER:

17. Have you taken any trips during the last twenty four (24) months? If the answer is yes, please state for each such trip the following: (a) the destination, (b) the date(s) of your trip, (c) the mode of travel, (d) the names and addresses of all persons who were with you at any time during said trip, (e) the total cost to you of the trip, and (f) the manner in which you paid for the trip.

ANSWER:

18. Please list the name, address and phone number of each person that you believe may have knowledge of or may be able to testify about any facts regarding any of the issues in this divorce action.

ANSWER:

19. For each person whom you expect to call as an expert witness at trial, please state: (a) the person's name, address and occupation, (b) the subject matter on which the expert is expected to testify, (c) a summary of the substance of the facts and opinions to which the expert is expected to testify; (d) the witness's qualifications (including a list of all publications authored in the previous ten years); and (e) a list of all other cases in which, during the previous four years, in which the witness has testified as an expert.

ANSWER:

20. For each parcel of real property owned by you or in which you have had an interest during the past five (5) years, please state: (a) the address or location; (b) the date acquired; (c) the name(s) in

which titled; (d) the purchase price; (e) the name and address of the note and/or mortgage holder; (f) the outstanding principal balance; (g) the fair market value on the date acquired or the date of this marriage (whichever is later); and (h) the current fair market value.

ANSWER:

21. For each parcel of property which is under a lease and/or option to purchase in which you have an interest, either individually, jointly with another person(s), through a partnership, joint venture or in connection with any of the business entities in which you own an interest, please state: (a) name(s) of each lessor; (b) address of each property; (c) date leased; (d) amount of monthly rent; (e) length of each lease; (f) length of time remaining under lease; and (g) terms of the option to purchase.

ANSWER:

22. For each and every motorized and non-motorized vehicle currently owned by you or in which you have had an interest at any time during the past two (2) years (including, but not limited to, automobiles, trucks, boats of any type, motors, trailers and airplanes) please state: (a) the type, year, make and model; (b) the date acquired; (c) the name(s) in which titled; (d) the purchase price; (e) the total amount of any outstanding debt; (f) the name and address of any creditor; (g) the monthly payment and source of funds for such payment; (h) the current mileage; (I) the primary driver; (j) the current location of the vehicle; and (k) the current fair market value.

ANSWER:

23. For each trust that was created by you or on your behalf or under which you have or expect to have any vested or contingent beneficial interest, please state the following: (a) the name of the trust; (b) the date the trust was created; (c) the name(s) of the person(s) who created the trust; (d) a description of all assets owned by the trust; (e) a description of your interest in the trust; and (f) the annual income that you have received from the trust for each of the last five years.

ANSWER:

24. For each and every policy of insurance on your life which is currently in force or which has been in force at any time during the past five (5) years, please state: (a) the name and address of the insurance company; (b) the policy number; (c) the face amount; (d) the current cash surrender value; (e) name of the insured; (f) name of owner of the policy; (g) type of policy (whole, life, universal, term) and (e) the name(s) of all persons who have been a beneficiary of the policy.

ANSWER:

25. For each and every asset currently owned by you or in which you have had an interest at any time during the past five (5) years, not previously listed in your answers to these interrogatories (such as debts owed to you, stock options, annuities, jewelry, furs, cash, coins, collectible items, guns, horses, gold, silver, antiques, office furnishings, equity memberships, patents, trademarks, service marks, inventions, royalties and anything else you believe has a value), please state: (a) the name or a description

of the asset; (b) the date that you acquired an interest; and (c) the current fair market value of your interest.

ANSWER:

26. For every asset (including real property, personal property, tangible and intangible assets) that you consider to be your separate property please state: (a) the name or description of the item; (b) the value of the item on the date of this marriage or the date you acquired your interest (whichever is later); (c) the current fair market value; and (d) why you consider the item to be your separate property.

ANSWER:

27. For every asset (including real property, personal property, tangible and intangible assets) that you consider to be marital property please state: (a) the name or description of the item; (b) the current fair market value; and (c) why you consider the item to be marital property.

ANSWER:

28. Have you sold, hidden, destroyed, given away or otherwise transferred anything with a fair market value of more than \$1,000.00 in the last twelve (12) months. If the answer is yes, please state for each such item: (a) a description of the item; (b) the date of such disposition; (c) the fair market value of the item on the date of disposition; and (d) the reason for such disposition..

ANSWER:

29. For all credit cards and charge accounts on which you now have, or have had, charge privileges, or to which charges have been made for your benefit or on your behalf, both personal and business, during the past two (2) years, please state: (a) the name of the issuer/creditor; (b) the account number; and (c) the current balance.

ANSWER:

30. Please list all debts, secured or unsecured, currently owed by you, stating for each debt: (a) the name and address of the creditor; (b) the date that the debt was incurred; (c) the original amount of debt; and (d) the current outstanding balance.

ANSWER:

31. Please list all debts, secured or unsecured, currently owed to you, stating for each debt: (a) the name and address of the debtor; (b) the date that the debt was incurred; (c) the original amount of debt; and (d) the current outstanding balance.

ANSWER:

32. Please itemize your current monthly living expenses by category (such as rent/mortgage(s), notes on motor vehicles, electricity, water, telephone, food, clothing, laundry and cleaning, gasoline, recreation and entertainment, club membership, medical and dental care, insurance,

bank notes, etc.), stating for each category the average amount that you actually pay each month for that category.

ANSWER:

33. Please itemize and state your opinion of the fair market value of each item of household furnishings acquired during the marriage and located at your current residence and also of that located at your spouse's current residence if different from yours, and also of that at any other location. State the location if other than the residence of you or your spouse. Include items in garages, storage sheds and so forth. Please indicate each item of household furnishings which you will seek to have the Court award you at the trial of this cause.

ANSWER:

34. If you maintain any safe deposit boxes in your name or store articles in a safe deposit box maintained in the name of another person or entity, please state: (a) name and address of bank or financial institution where box is located; (b) name and address of person or entity in whose name the box is maintained; (c) complete listing of all articles stored in the box; (d) date the box was rented by you or on which you began using box; and (e) complete listing of all articles removed by you from the box since the date of this marriage.

ANSWER:

35. State the name and addresses of all institutions to which you have submitted a financial statement since the date of this marriage, and the date submitted.

ANSWER:

36. Do you contend that there is a valid prenuptial agreement between you and your spouse? If the answer is yes, please state all of the facts and circumstances surrounding the execution of said prenuptial agreement, from the time that executing such an agreement was first mentioned, through the negotiation and drafting of said agreement, to the time that said agreement was actually executed.

ANSWER:

37. Have you or anyone living in your household ever been arrested? If the answer is yes, please state for each such person the following: (a) their name, (b) the date of the arrest, (c) the person who was arrested, and (d) the reason for the arrest.

ANSWER:

38. For every cellular phone that you have used at any time during the past two (2) years, please provide: (a) the phone number, (b) the name of the cellular provider, (c) the name in which the account was maintained, and (d) the beginning and ending dates of your use of the phone.

ANSWER:

39. Have you or anyone living in your household received any counseling from a psychiatrist or a psychologist during the past five (5) years? If the answer is yes, please state for each such person: (a) their name, (b) the name of each psychiatrist and psychologist from whom they received the counseling, (c) the date of the first and last counseling sessions, and (d) the reason for the counseling.

ANSWER:

40. Have you or anyone living in your household used any illegal drugs or consumed any other illegal controlled substances at any time since the date of this marriage? If the answer is yes, please state for each such person: (a) their name, (b) the name of the drug(s) taken, and (c) the dates that the drugs were taken.

ANSWER:

41. For each detective, private investigator or other individual hired or used for the purpose of obtaining facts about the issues in this case, please state: (a) the person's name and address; (b) every date on which the person was hired or used, (c) the purpose for which said person was hired or used, and (d) a summary of the facts that were discovered by said person.

ANSWER:

42. For every medical care provider that you have seen during the past five (5) years, please provide the following information: (a) their name, address and phone number, (b) the date(s) that you saw

said medical care provider, and (c) a brief summary of any diagnoses that were made of you by said medical care provider and any treatments suggested.

ANSWER:

43. For every drug, prescribed and otherwise, that you have taken during the past twenty-four (24) months, please state (a) the name of the drug; (b) if prescribed, the name, address and telephone number of the physician who prescribed it; (c) if not prescribed, where you obtained the drug; and (d) the reason you took said drug.

ANSWER:

44. Please list each and every gambling establishment, entity or person with whom you have gambled within the past three (3) years. State the frequency with which you have gambled with the establishment, entity or person, the amount that you have won from gambling with said establishment, entity or person, and the amount that you have lost with said establishment, entity or person within the past three (3) years.

ANSWER:

45. Please state whether or not you have ever videotaped or audiotaped your spouse. If so, please state who performed the video or audiotaping; when the taping occurred and the nature of what is presented on the video and/or audio.

ANSWER:

46. Have you used a computer, including desktop, personal digital assistant, laptop, notebook or the internet within the past thirty-six (36) months? If so, (a) do you currently have possession of the electronic device; (b) please list all email addresses you have used for purposes of communication via the internet; (c) the name of the internet access organization or provider; and (d) the password(s) or screen name(s) you have used.

ANSWER:

47. For any and all frequent flier miles, credit card points, rewards points and other similar programs in which you have an interest during the past twenty-four (24) months, please state: (a) the name and address of the institution where maintained; (b) the name in which the account(s) is (are) titled; (c) the account number; (d) the balance/fair market value on the date you acquired an interest or on the date of this marriage (whichever is later); and (e) the current balance/fair market value.

ANSWER:

48. For any and all gift cards, prepaid gift (credit) cards, merchandise credit and other similar credits in which you currently have an interest, please state: (a) the name and address of the institution where the credit is maintained; (b) the amount of the gift card(s) or credit(s); and (c) the source of the gift card(s) or credit(s).

ANSWER:

49. Do you have any complaints with your spouse as a parent? If yes, please state, with specificity, all complaints you have with your spouse, listing all specific incidents of misconduct by your spouse, and stating the names of any persons who witnessed or have any knowledge whatsoever of any of the events that you describe.

ANSWER:

50. Please state in detail what you consider to be the best custodial arrangements for your child(ren) and why.

ANSWER:

51. Is there anything about your spouse that renders him/her unfit to have primary physical custody of your child(ren)? If so, describe with specificity the unfitness.

ANSWER:

52. State whether you and your spouse have any major disagreements concerning the child(ren)'s education, religious upbringing, discipline, health needs and/or extracurricular activities and, if so, detail the nature of such disagreement and each party's position as you perceive it.

ANSWER:

53. State any difficulties your child(ren) is/are having and state how you are equipped to deal with these difficulties.

ANSWER:

54. Do you claim that your child(ren) has/have expressed a preference to live with you? If so, state which child stated such preference, the words used, the conversation surrounding such expression, and the dates of such expression.

ANSWER:

55. Describe in detail how you discipline your child(ren).

ANSWER:

56. Describe your plans for the child(ren)'s educational development and how you intend to implement these plans.

ANSWER:

57. Do you have plans to relocate? If so, describe your relocation plans.

ANSWER:

Respectfully submitted,

Larry Hayes, Jr.

No. 15481

**Jackson, Kweller, McKinney,
Hayes, Lewis & Garrett**

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Attorney for the Plaintiff,

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served via the following method(s) upon the following individual(s) on this the ____ day of _____, 201__.

1. _____, **Esq.**

- Electronic Mail
- U.S. Mail
- Facsimile
- Hand Delivery

Larry Hayes, Jr.

