

## INTERROGATORIES

The <<Client's party designation>> serves upon the <<Opposing party's party designation>> the following Interrogatories pursuant to Trial Rule 33 of Indiana Rules of Procedure . The <<Opposing party's party designation>> shall serve a copy of the answers and objections within a period designated by the <<Client's party designation>>, not less than thirty (30) days after the service thereof or within such shorter or longer time as the court may allow. All information is to be divulged which is in your possession or control or within the possession and control of your attorney. Where an Interrogatory calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable. You are reminded that all answers must be made separately and fully, and that an incomplete or evasive answer is a failure to answer. You are under a continuing duty to seasonably supplement your response with respect to any questions.

### General Instructions for Answering

All information is to be divulged which is in your possession or control or within the possession and control of your attorney. Where an Interrogatory calls for an answer in more than one part, each part should be separated in the answer to that the answer is clearly understandable. You are reminded that all answers must be made separately and fully, and that an incomplete or evasive answer is a failure to answer. You are under a continuing duty to seasonably supplement your response with respect to any questions which you later determine or learn are incorrect..

### Specific Instructions for Answering

1. Whenever a document is relied upon or forms a partial or complete basis for an answer given or which corroborates the answer given, identify by date, the sender, recipient, location and custodian of each such document;
2. If the information furnished is not within the personal knowledge of the person answering, identify by name and address each person to whom the information is a matter of personal knowledge.
3. Where an interrogatory calls for an answer in more than one (1) part, each part should be separated in the answer so that the answer is clearly understandable.
4. Definitions. As used in these interrogatories, the terms listed below, shall be defined as follows:
  - A "With particularity" — refers to a complete detailed account of what happened. It should include, when appropriate, all dates, times, and amounts; the identifications of all documents; all written and oral communications relevant thereto. If such details are the same for more than one interrogatory, repetition is not necessary, providing you supplied complete details in your answer to another interrogatory, and in its subsequent answer refers to the interrogatory number at which the details were previously supplied.
  - B. "Written communication" — means without limitation, correspondence letters and telegrams even if not received.
  - C. "Documents" — means without limitation, all records, plans, drawings, papers, minutes, agreements, contract, and memoranda.

D. "Other Monthly Income." All income you receive which should include, but not be limited to dividends, interests, rents, royalties, pensions, retirements, social security, disability, unemployment and other workman s compensation

E. "Total Income." The income that you reported on your tax return. This should include all salary, wages, commissions, bonuses, dividends, and business income.

F. "Health Care Providers" — includes all medical personnel, doctors, chiropractors, nurses, therapists, counselors, school counselors, hospitals, or clinics.

6. Grammar and syntax as used in these interrogatories, shall be construed and interpreted to give proper meaning and consistency to its context. By way of illustration and not by way of limitation, the singular may be construed to include the plural; the plural to the singular and the use of any gender or tense may be construed to include all genders and tenses.

«INSERT "Signature and certificate of service.wpt"»

## INTERROGATORIES

1. State your: full name and address

ANSWER:

2. Do you own any securities, including stocks, bonds, debentures, or mortgages? If so, for each purchase, please state:

- a) The type and number of securities owned; and
- b) The name and address of the broker through whom the purchase was made.

ANSWER:

3. Please state with particularity the names and addresses of business entities in which you have any interest and describe the nature of your interest.

ANSWER:

4. State your:

- a) Current hourly wage;
- b) Number of hours worked per week;
- c) Gross weekly salary;
- d) Net weekly salary;
- e) List all deductions from your pay check;
- f) List purpose of each deduction.
- g) State the weekly amount, if any, for work related child care expenses.
- h) State the weekly amount, if any, for any child support orders for a previous marriage(s).

ANSWER:

5. Please state the amount, if any, spent weekly on the following items:

- a) Health insurance premium for one born of this marriage.
- b) Support of a one born of a previous marriage of whom you have custody.
- c) Child support paid for a one born of a previous marriage of whom you do not have custody.

ANSWER:

6. Please list all items of personal property and any other property you own jointly or solely in your name, their approximate fair market value, and the location of each item of property.

ANSWER:



7. List all of your sources of income for the past six (6) months.

ANSWER:

8. Do you receive any of the following benefits from your employment (employment including self-employment)? Please specify which benefits you receive and please state when you began receiving the benefit, the amount you have received since you began receiving the benefit and how much you received during the past year, what limitations there are upon each benefit, the current value of the benefit and how that value was calculated:

- a) Deferred salary plan, short-term deferred income or deferred profit sharing
- b) Stock bonus or purchase plans, stock options, and stock appreciation rights
- c) Incentive growth funds
- d) Life, disability, or health insurance
- e) Savings plans
- f) Death benefits
- g) Minimum annual income guaranty
- h) Employment guaranty
- i) Moving and relocation costs
- j) Business and professional memberships or club memberships.
- k) Company-subsidized travel
- l) Paid vacations (part of bonus plan); determine number of days.
- m) Home entertainment allowance
- n) Tickets for theater and sports
- o) Company-provided automobiles, planes, yachts
- p) Company-provided apartment or other subsidized housing
- q) Personal use of expense accounts, credit cards
- r) Low interest loans
- s) Tuition funds
- t) List all safety deposit boxes which you own.
- u) List all loan applications you have made in the past year and include the names and complete addresses of all institutions through which you have applied for any such loan.
- v) List all Courts in which any business entity in which you have any interest have been the party to a lawsuit.

ANSWER:

9. Please list all bank accounts or deposits of money in any financial institution, credit union or elsewhere, either alone or together with any other person, including the account number, persons named on the account, type of account, and current balance of each account.

ANSWER:

10. List each person you intend to call as a witness at the trial of this cause, and for each witness, state the address, telephone number, and the substance of said witness's testimony.

ANSWER:

11. List all loan applications you have made in the past year and include the names and addresses of all institutions through which you have applied for any such loan.

ANSWER:



8. List all other sources of income by the source of this income and the amount of income received over the past week.

Answer:

I affirm, under the penalties for perjury, that the foregoing answers are true.

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«[Opposing party's name](#)»