

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, <http://www.idsupra.com/post/documentViewer.aspx?fid=da1300c7-b3a1-4f31-a888-e0e1d42618dd> dividends, interests, rents, royalties, pensions, retirements, social security, disability, unemployment and other workman s compensation **Document hosted at JD SUPRA™**

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"»

1. State your:
 - a. Full name and address
 - b. Employer (all employers)
 - e. Address of Employer
 - f. Occupation
 - g. Shift you work
 - h. Currently hourly rate (including shift premiums and costs of living)
 - i. Average number of hours worked each week.
 - j. Average weekly gross salary, wages and commissions

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

ANSWER:

3. Does anyone owe you money? If so, state for each such debt:
 - a) The name and the address of the debtor; and
 - b) The amount owed.

ANSWER:

4. 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:

5. 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:

6. If you own real estate answer the following:

- a. Where is the real estate located?
- b. When was the real estate was last appraised and for what amount the real estate was real estate appraised?
- c. When was the last tax assessment on your real estate and for what amount was the assessed?
- d. When and how was the real estate acquired?

Interrogatories to «**Opposing party's name:LIKE THIS**»

e. What do you calculate your equity in the real estate and how did you calculate this amount. (If at more than one piece of real estate, please the amount of equity and how you calculated this amount for each parcel.)

f. Are there any co-owners besides the «Client's Party Designation::Like This» to this property.

ANSWER:

7. 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:

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) Pensions or Annuity
- g) Death benefits
- h) Minimum annual income guaranty
- i) Employment guaranty
- j) Moving and relocation costs
- k) Business and professional memberships or club memberships.
- l) Company-subsidized travel

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- m) Paid vacations (part of bonus plan); determine number of days.
- n) Home entertainment allowance
- o) Tickets for theater and sports
- p) Company-provided automobiles, planes, yachts
- q) Company-provided apartment or other subsidized housing
- r) Personal use of expense accounts, credit cards
- s) Low interest loans
- t) Tuition funds
- u) List all safety deposit boxes which you own.
- v) 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.
- w) 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. Do you keep or use any safety deposit box or boxes or other depositories for your securities, cash, or other valuables, either alone or together with any other person, in your own or any other name? If so, for each state name and address of the depository, the name in which depository is kept, the name and address of every other person

who has a right to access thereon, and a description and value of the contents.

ANSWER:

11. List each person you intend to call as a witness at the trial of this cause, and for each witness, an address, telephone number, and the substance of said witness's testimony. JD SUPRA™
<http://www.jdsupra.com/post/documentViewer.aspx?fid=da1300c7-b3a1-4f21-a888-e0e1d42618dd>

ANSWER:

12. Are you receiving or will you be entitled to receive any annuity? If so, state the name and address of payor, the policy number or other identifying date, the frequency of payments and amount of each payment, and the terms and conditions of said annuity.

ANSWER:

13. Are you now entitled to receive any distribution from any litigation, decedent's estate, guardianship, or liquidation proceedings? If so, give descriptions, dates, and amounts.

ANSWER:

14. Are you, or have you been, a participant in any retirement or pension plan which would or might entitle you to receive benefits upon your retirement? If so, for each such plan, state the name and address of the administrator, the account number or other identifying data, the present cash value of your interest therein, and your basis for such value, whether your interest is vested or non-vested, whether you are entitled to borrow against such interest, and the circumstances that would entitle you to receive benefits.

ANSWER:

15. During the past five (5) years, have you transferred or disposed of any property of any nature whatsoever (other than payments for usual and ordinary living expenses)? If so, for each said transfer or disposition, state the description and value of said property, the name and address of the transferee, the date of transfer or disposition, and the reason for any such transfer or disposition.

ANSWER:

16. What would you consider to be a fair and equitable division of the assets and liabilities in this case?

ANSWER:

17. List all safety deposit boxes which you own.

ANSWER:

18. 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:

19. List all Courts in which any business entity in which you have any interest have been the party to a lawsuit.

ANSWER:

I hereby affirm under the pains and penalties of perjury that the above and foregoing representations are true to the best of my knowledge.

Interrogatories to «**Opposing party's name:LIKE THIS**»

DATED THIS _____ DAY OF _____

<http://www.jdsupra.com/post/document/viewer.aspx?fid=da1300c7-b3a1-4f21-a888-e0e1d42618dd>, «Year:190».

«Opposing party's name:LIKE THIS»

Interrogatories to «Opposing party's name:LIKE THIS»