

<INSERT "fam-1 caption.wpt">

<IF Is there an Intervenor?>

<Name of Intervenor>

Intervenor<END IF>

## INTERROGATORIES TO INTERVENOR

The <Client's party designation> serves upon the <Name of Intervenor> the following Interrogatories pursuant to Trial Rule 33 of Indiana Rules of Procedure . The <Name of Intervenor> 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:
  - a. Full name and address

ANSWER:

2. 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:

3. Please state who should have custody of the children born of this marriage, and please state why your position is in the best interests of the children?

ANSWER:

4. Please describe the interaction and interrelationship of the child with the following persons:

- (a) with you;
- (b) with your spouse or any other significant other living with you;
- (c) the child's sibling(s), if any;
- (d) the mother;
- (e) the father;
- (f) any other person who may significantly affect the child's best interests; including this person's relationship to the child, and address.

ANSWER:

5. Please describe the child's adjustment to the child's:
- (a) home;
  - (b) school; and
  - (c) community.

ANSWER:

6. List all anticipated exhibits. Indicate:
- (a) what is the exhibit;
  - (b) where it was obtained; and
  - (c) purpose of the exhibit.

ANSWER:

7. Please state all facts which rebut the presumption that the «Client's party designation», «Client's name», should not have custody.

ANSWER:

8. Please state all facts supporting your contention that it is in the best interest of «Child or children» that «Name of Intervenor» have custody.

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.

DATED THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, <Year:1990>.

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<Name of Intervenor>