**IN THE IOWA DISTRICT COURT FOR POLK COUNTY**

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| IN RE THE MARRIAGE OF JOHN DOE AND JANE DOE |
| Upon the Petition ofJOHN DOE,Petitioner,And Concerning,JANE DOE,Respondent. | CASE NO. \*\*\*\*\*\*\*\* **INTERROGATORIES** |

COMES NOW, Petitioner, John Doe, by and through his attorney of record, Mark R. Hinshaw, pursuant to Rule 1.509 of the Iowa Rules of Civil Procedure, and propounds the following Interrogatories to Respondent, Jane Doe.

 The Interrogatories are directed to the knowledge of Respondent, his attorney or other representatives. The Interrogatories are continuing in nature and shall be supplemented pursuant to Rules 1.503(4) and 1.508(5) of the Iowa Rules of Civil Procedure.

 In the event a privilege is asserted as to any Interrogatory or part thereof, or if the Interrogatory is otherwise not answered or complied with in full, state the specific ground for not answering and complying with the Interrogatory, or comply to the extent to which there is no objection.

**DEFINITIONS**

 1. **“IDENTIFICATION”**, **“IDENTIFY”**, or **“IDENTITY”**, means:

 a. As to a **“natural individual”**, his or her full name, residential address, business address, and telephone number.

 b. As to a **“corporation”**, its full corporate name, any names under which it does business, and the address and telephone number of its principal place of business.

 c. As to a **“documents”**, the number of pages, the nature of the document (e.g. letter, memorandum, etc.), the title, date, name or names of the authors and recipients, and the present location and custodian.

 d. As to a **“communication”**, the date, manner, place, and substance of the communication; if it is written, the document or documents which refer to or evidence the communication and, if unwritten, “identify” the persons participating in the communication.

 2. **“DOCUMENT”** means a writing, drawing, graph, photograph, audio tape, video tape, or other data from which information can be obtained and translated into a usable form, whether original or copy.

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 ATTORNEY FOR PETITIONER

Original to:

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| **CERTIFICATE OF SERVICE**The undersigned certifies that the foregoing instrument was served upon all parties to the above cause or to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on June 7, 2017.By: \_\_ U.S. Mail \_\_ FAX \_\_ Hand Delivered \_\_ E-mail \_\_ Certified Mail \_\_ Other:\_\_\_\_\_\_\_\_\_Signature:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

Respondent and/or Respondent’s Attorney

INTERROGATORY NO. 1. Identify each person you expect to call as a witness at the trial of this matter and, with respect to each such person, state:

 (a) Each person’s name, address, and phone number;

 (b) The subject matter on which each person is expected to testify;

 (c) The substance of the facts and opinions to which each person is expected to testify;

 (d) Any assumed facts upon which each person will rely; and

 (e) The contents of any documents upon which each person will rely.

ANSWER:

INTERROGATORY NO. 2. Identify each person that you expect to call as an expert witness at the trial of this matter and, with respect to each such person, state:

 (a) Name, business and addresses and business and residence telephone numbers;

 (b) The expert’s occupation, vocation, and professional field, if any;

 (c) The expert’s education, extent of training and experience, including all schools attended, degrees and certificates awarded and the dates thereof;

 (d) The subject matter on which the expert is expected to testify;

 (e) The expert’s qualifications to testify as an expert on such subject;

 (f) The substance of the facts and opinions on which the expert is expected to testify;

 (g) A summary of the grounds for each opinion; and

 (h) The mental impressions and opinions held by the expert and facts known to the expert, including the assumed facts upon which the expert witness will rely.

NOTE:   Iowa Rule of Civil Procedure 1.508(1)(a) also requires that for an expert retained in anticipation of litigation or for trial, an expert shall sign the answer. Please comply with this rule. A form, using Iowa Rule of Civil procedure 1.501(4), so that no notary is required, is provided below for compliance with this rule.

ANSWER:

 I have fully read the preceding Answer to Interrogatory relating to me, and I certify under penalty of perjury and pursuant to the laws of the State of Iowa that the proceeding Answer is true and correct.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date Signature

INTERROGATORY NO. 3. If you intend to introduce as evidence at trial any written and/or oral statement and/or communication of either the Petitioner or Respondent, set forth in detail the following:

 (a) The substance of each such oral statement;

 (b) Attach a copy of each such written statement and/or communication;

 (c) Set forth the date of each such communication or statement; and

 (d) Identify all persons present during the oral statement or communication.

ANSWER:

INTERROGATORY NO. 4. Identify any document or tangible thing that you failed to produce pursuant to any request made of you by Respondent pursuant to Iowa Rule of Civil Procedure 1.512 in this litigation and, pursuant to Iowa Rule of Civil Procedure 1.509(2), the specific legal reasons you contend support or justify your failure to produce the requested document or tangible item.

NOTE: This Interrogatory does not require that you disclose the contents of such document or tangible thing.

ANSWER:

INTERROGATORY NO. 5. Have you, or anyone acting on your behalf including attorneys, representatives, employees, agents, and independent contractors made any investigation, examination, report, photograph, tape recording or surveillance concerning any matter relevant to the subject matter of the pending action? If so, for each investigation, examination, report, photograph, tape recording or surveillance, please state:

 (a) The nature of the item or method used to make it;

 (b) Its subject matter;

 (c) The name, address and telephone number of each person who requested or authorized it;

 (d) The name, address, telephone number, qualifications and capacity of each person who made it;

 (e) The date and time it was started and completed and the number of working hours spent in making it;

 (f) The place in which it was made;

 (g) The cost of making such item;

 (h) The name, address and telephone number of each person for whom it was made or to whom it was directed;

 (i) Whether it was a special undertaking or made in the regular course of business;

 (j) Whether it was made in preparation for litigation;

 (k) The purpose of making it; and

 (l) Whether in making it any person was interviewed or examined and, if so, the name of such person.

ANSWER:

INTERROGATORY NO. 6. List and describe each job you have held since the date of your marriage through the date of your answers to these Interrogatories, including for each occupation listed:

 (a) The name, address, and telephone number of your employer;

 (b) The title or position you held;

 (c) The date of your employment;

 (d) Your hourly rate of pay or annual salary;

 (e) The average number of hours worked per week;

 (f) The manner in which you were paid (i.e. weekly, bi-weekly, monthly);

 (g) The total amount of wages you have been paid this year to date, including the total amount of deductions for federal and state income taxes or any other deductions;

 (h) Describe each fringe benefit you received from your employer in addition to your salary;

 (i) The manner in which you receive salary increases, bonuses and/or cost of living increases in your wages;

 (j) The amount of your last wage increase, bonus and/or cost of living increase in your wages and the date that you received it;

 (k) State in detail your immediate future plans concerning your employment and the amount of compensation you expect to receive; and

 (l) The reason for leaving employment, if any.

ANSWER:

INTERROGATORY NO. 7:Describe in detail your educational background, and include the names and addresses of all institutions that you have attended, the dates of attendance, and a description of the degrees or certificates that you have obtained.

ANSWER:

INTERROGATORY NO. 8:For each of your checking, savings, money market and brokerage accounts at any financial institution, either in your name or in which you have any interest or the authority to withdraw funds, state the following:

 (a) The name and address of the bank or financial institution;

 (b) The type of account;

 (c) The name or names on the account;

 (d) The person authorized to draw on the account;

 (e) The date the account was opened;

 (f) The date the account was closed, if closed;

 (g) The account number; and

 (h) The amount of the present balance, if any, or the amount of the last balance before the account was closed.

ANSWER:

INTERROGATORY NO. 9:State whether or not you have any beneficial interest in any profit sharing, pension or retirement plan and describe the plan in detail indicating the gross amount of your beneficial interest, whether vested or unvested; the present fair market value of your interest; the calculations which support your conclusions concerning the present fair market value of your interest; the name and address of the trustee of the plan. The projected increase in value of your interest in the present calendar year; and the name of the administrator of the plan if different from the name of the trustee.

ANSWER:

INTERROGATORY NO. 10:Please describe, in detail, the permanent legal and physical custody arrangements, including both physical care and legal custody, which you believe are in the best interests of the minor children of the parties, and specifically address the amount of time that each parent should have with said child, including weekly, weekend, summer, holiday, and school breaks.

ANSWER:

INTERROGATORY NO. 11. Pursuant to Iowa Rule of Civil Procedure 1.509(2), state your reasons for the custodial disposition and visitation described by you in your answer to the preceding Interrogatory is in the best interest of every minor child whose welfare is affected by this action.

ANSWER:

INTERROGATORY NO. 12. Describe the house, apartment or living quarters in which the children will reside should you be awarded primary physical care, stating:

 (a) Whether you own, are in the process of buying, or are renting the residence;

 (b) The size of the residence including:

 (1) Number of rooms;

 (2) Number of bedrooms;

 (3) Number of bathrooms;

 (4) Complete square footage;

 (c) A general description of the neighborhood;

 (d) The address of the residence;

 (e) The proximity of the residence and relationship to schools, church and other facilities which the children will regularly attend;

 (f) Geographical relationship of the residence to Respondent’s residence; and

 (g) The length of time you expect to remain at the residence and any reasons for an expected change of residence, if any.

ANSWER:

INTERROGATORY NO. 13. Describe your intentions for the supervision of the children should you be awarded primary physical care, and with regard to such supervision state:

 (a) What type of job you plan to hold and the anticipated work hours;

 (b) The name of each person who will be responsible for the children for each 24-hour period for 7 days each week;

 (c) The background of each person identified in your answer to subparagraph (b) above and their qualifications for caring for such children;

 (d) Whether you or any other proposed supervisory party ever been charged with any type of child abuse or other crime;

 (e) The state of the mental and physical health of each person mentioned in your answer to subparagraph (b) above;

 (f) Your philosophy and the philosophy of each proposed supervisory person concerning proper child discipline, including whipping, isolating the child, ignoring the child’s acts and all other forms of discipline;

 (g) What are the methods and forms of punishment you have used in disciplining the children;

 (h) The name and address of each person who has served in a supervisory capacity over the children and the method and amount of compensation as well as the reason for employing that person.

ANSWER:

INTERROGATORY NO. 14. Do you believe that Petitioner is a fit and proper person to have primary physical care of the children, and do you agree that the Court should award primary physical care to Petitioner? If your answer to either question is “no,” please set forth in detail:

 (a) Each and every reason or fact in support of your position;

 (b) The identity of each person who can give testimony to support or corroborate your answer of why you claim Respondent is not a fit and proper person to have primary physical care of the child;

 (c) Why you do not agree that the Court should award primary physical care of the child to Respondent; and

 (d) Why you claim it is not in the best interest of the children for the Court to award primary physical care to Respondent.

ANSWER:

INTERROGATORY NO. 15. Set forth in detail, if you have not done so in your answers to the previous Interrogatories, all reasons why you feel it would be in the best interests of the children to be in your primary physical care, and set forth the following in detail:

 (a) Any observations or evidence which you now have to substantiate those reasons;

 (b) Any and all reasons or evidence which you have as to why you believe it would be in the best interests of the children to be in your primary physical care; and

 (c) Identify each witness, including address and telephone number, who can substantiate your position or has knowledge of your claim;

 (d) Describe all activities in which you claim you and the children have been involved which supports your position that the best interests of the child requires that their primary physical care be placed with you, including date, time, location and all witnesses to such activities.

ANSWER:

INTERROGATORY NO. 16. Do you believe that you and Respondent should be granted joint legal custody of the children? If not, set forth in detail all reasons why you believe it would not be in the best interests of the child to be in the joint legal custody of you and Respondent.

ANSWER:

INTERROGATORY NO. 17.Describe in detail your communication with Respondent regarding the children’s education.

ANSWER:

INTERROGATORY NO. 18. Describe yourself concerning the following characteristics:

 (a) Character;

 (b) Stability;

 (c) Capacity and interest to provide the following needs for your children:

 (1) Emotional;

 (2) Educational;

 (3) Physical;

 (4) Social;

 (5) Moral;

 (6) Religious;

 (7) Material; and

 (8) Interpersonal.

ANSWER:

INTERROGATORY NO. 19. Describe the following present characteristics of Petitioner:

 (a) Character;

 (b) Stability;

 (c) Capacity and interest to provide the following needs for your children:

 (1) Emotional;

 (2) Educational;

 (3) Physical;

 (4) Social;

 (5) Moral;

 (6) Religious;

 (7) Material; and

 (8) Interpersonal.

ANSWER:

INTERROGATORY NO. 20. Describe in detail the following characteristics of your children whose interests may be affected by this matter:

 (a) Age;

 (b) Maturity;

 (c) Mental health;

 (d) Physical health;

 (e) Social needs;

 (f) Education needs;

 (g) Moral needs;

 (h) Material needs;

 (i) The interpersonal relationship between the children and you;

 (j) The interpersonal relationship between the children and Petitioner.

ANSWER:

INTERROGATORY NO. 21. Explain your contentions and/or beliefs and reasons as to what a proper amount of spousal support would be for you and for what duration.

ANSWER:

INTERROGATORY NO.22. Explain your contentions and/or beliefs and reasons as to who should have rights to the martial home and why.

ANSWER:

INTERROGATORY NO. 23: Please provide the following information regarding your

present and anticipated future living expenses:

1. What is the amount of your house payment or rent;
2. What is your average expense for utilities and phone;
3. What is the approximate amount you spend monthly on each of the following:

1. Food and meals;

2. Car expense or transportation (insurance, gas, maintenance, etc.);

3. Medical expenses (list in detail);

4. Entertainment (specify);

5. Clothing;

1. yourself
2. others (specify)

6. Installment payments (list all payments, amounts, regularity of payments

and to whom paid); and

7. Other expenses (specify).

ANSWER:

INTERROGATORY NO. 24: Give your best estimate of your personal net worth on the day prior to your marriage and on the date the Petition was filed in this case and itemize all assets and debts used to arrive at said personal net worth, including but not limited to any business entities you may have an interest in.

ANSWER:

INTERROGATORY NO. 25: Do you believe you should be entitled to receive one-half (1/2) of the assets and debts resulting from this marriage and if so, please state how you would divide the assets and debts, including all items and all values.

ANSWER:

**VERIFICATION**

 The undersigned hereby states that I have read the foregoing Answers to Interrogatories and know the contents thereof, and under penalty of perjury hereby state that the information contained therein is true and accurate to the best of my knowledge and belief.

 Dated this \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2017.

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 Respondent, Jane Doe