

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

NO.

**IN THE MATTER OF
THE MARRIAGE OF**

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AND IN THE INTEREST OF

CHILD

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IN THE COUNTY COURT

COURT FOUR

WILLIAMSON COUNTY, TEXAS

**FIRST SET OF
WRITTEN INTERROGATORIES TO RESPONDENT**

TO: (hereinafter referred to as the “Responding Party”) by and through his counsel of record.

FROM: , by and through her attorney of record,
Terence Davis, (hereinafter referred to as the “Requesting Party”).

**I.
DEFINITIONS**

“Responding Party” and “Requesting Party” – refer to the parties specifically identified above.

“You,” and “your” refer to and are intended to include the “Responding Party” set forth above, your employees, and/or your agents, either individually or as a representative of any corporation, association, or partnership, as the case may be, as well as any testifying expert witnesses retained by you or retained on your behalf relating to this litigation and any consulting experts whose work product has been reviewed by, relates to, or forms the basis, either in whole or in part, of the mental impressions and opinions of any testifying experts.

“Person” includes and is intended to mean any natural person or the representative of any company, limited liability company, firm, nonpublicly traded corporation, association, trust,

business trust, partnership, limited partnership, family limited partnership, limited liability partnership, joint venture, proprietorship, or any other form of business entity.

“Entity” or “entities” includes and is intended to mean any company, limited liability company, firm, nonpublicly traded corporation, association, trust, business trust, partnership, limited partnership, family limited partnership, limited liability partnership, joint venture, proprietorship, or any other form of business entity.

“Relates to” means in whole or in part constitutes, contains, concerns, embodies, relates, analyzes, identifies, states, refers to, deals with, or in any way pertains to.

“Item,” “document,” or “documents” includes, but is not limited to, each tangible thing, recording, or reproduction of any visual or auditory information, including but not limited to papers, books, accounts, drawings, graphs, charts, photographs, electronic or videotape recordings, data, and data compilations, however made, whether handwritten, typewritten, or printed material, drafts, duplicates, carbon copies, photocopies, e-mail, scanned documents, digital documents, and all other copies.

“Parties” means Petitioner or Respondent or both Petitioner and Respondent.

“Fringe benefit” means any benefit from an employer apart from salary, including but not limited to payment of personal expenses; payment of housing expenses; vacation pay; payment of medical, hospitalization, or dental insurance, life insurance, annuities, and disability insurance policies; payment of automobile expenses (including note payment, gasoline, repairs, maintenance, insurance, and mileage compensation); payment of travel allowances; deferred compensation plans, 401(k) contributions, stock options, or retirement or pension benefits; country club or other memberships; use of company airplanes, homes, boats, or cars; payment of business professional dues; interest-free or low-interest loans; payment of legal fees; accounting or bookkeeping services; and payment for items used by you personally.

“Identify” means to provide the information necessary, name, address, and phone number of the person or entity or provide the location of the document requested.

II. INSTRUCTIONS

A. Relevant Time Period

This discovery seeks information that relates to the parties, their children, income and expenses, and their legal positions with regards to the same.

Relevant time period is defined as the duration of the marriage to present.

B. Duty to Amendment or Supplement Response pursuant to TRCP 193.5

If you learn that your response to this request was incomplete or incorrect when made or that, although it was complete and correct when made, it is no longer complete and correct, you must amend or supplement the response -

1. to the extent that the request seeks the identification of persons with knowledge of relevant facts, trial witnesses, or expert witnesses, and

2. to the extent that the request seeks other information, unless the additional or corrective information has been made known to the other parties in writing, on the record at a deposition, or through other discovery responses.

You must make amended or supplemental responses reasonably promptly after you discover the necessity for such a response.

INCOME ISSUES

INTERROGATORY REQUEST NO. 1- *(Identify all sources of income)*

Please identify each source of income you have earned or received during the relevant time period as defined in the instructions above, including but not limited to unemployment income, salary, wages, cash income, bonuses, commissions, fringe benefits, severance pay, retirement benefits, pensions, trust income, annuities, capital gains, social security benefits other than supplemental security income, disability benefits, worker's compensation benefits, interest income, gifts, prizes, spousal maintenance or alimony, personal income, business income, passive income, rental income, royalties, self-employment income, income, or any other source of income.

RESPONSE:

INTERROGATORY REQUEST NO. 2:- *(Employment History)*

Identify any and all places you were employed or earned income from the date of the marriage to present and identify any employment benefits obtained at each such place of employment.

RESPONSE:

INTERROGATORY REQUEST NO. 3:- *(Financial info)*

Identify the name of each bank, credit union, or other financial institutions in which you have/had an account during the relevant time period as defined in the instructions above, and include:

- a. the type of account;
- b. the account number
- c. the balance you had in each account on the first of the month during the past six months; and
- d. whether the account is currently open, closed, or frozen

RESPONSE:

INTERROGATORY REQUEST NO. 4:- *(Assets or other financial resources available)*

Identify any and all financial resources available to you or positive or negative cash flow from any real estate, personal property, assets, businesses, or investments. TFC 154.123

RESPONSE:

INTERROGATORY REQUEST NO. 5:- *(Conservatorship)*

Please identify which party you contend should have the exclusive right to determine the primary residence of the children and briefly identify the general facts, documents, and witnesses that support your contention.

RESPONSE:

INTERROGATORY REQUEST NO. 6:- *(Possession and Access)*

Please identify the possession and access schedule that you contend each party in this case should have with the child(ren) and briefly identify the general facts, documents, and witnesses that support your contention.

RESPONSE:

INTERROGATORY REQUEST NO. 7:- *(Decision Making)*

Please identify how you contend how educational, major medical, and psychological decisions should be made by each party in this case, i.e. independently, exclusively, or jointly.

RESPONSE:

INTERROGATORY REQUEST NO. 8:- *(Monthly Expenses)*

Identify each of your monthly expenses, including but not limited to, the following:

- a. Mortgage(s) or rental payments;
- b. Vehicle payments;
- c. Food or groceries;

- d. Fuel for vehicles;
- e. Auto Insurance;
- f. Health Insurance;
- g. Utilities (including water, trash, gas, electric);
- h. Cellular phone;
- i. Land-line phone
- j. Internet;
- k. Cable or satellite television;
- l. Business expenses;
- m. Childcare;
- n. Education;
- o. Any other expenses more than \$50 per month

TFC 154.123

RESPONSE:

INTERROGATORY REQUEST NO. 9:- *(Geographic Area)*

If you contend that the right to designate the primary residence of the children should be limited by a geographic area, please identify the geographic area that you contend is in their best interest and the general facts and documents that support your contention.

RESPONSE:

INTERROGATORY REQUEST NO. 10:- *(Child Support Calculation)*

If you were required to pay child support for the child(ren) involved in this litigation, please identify the amount of child support that you contend would be in your child(ren)'s best interest

and identify the general factual basis supporting your contention and identify the documents that support your contention.

RESPONSE:

INTERROGATORY REQUEST NO. 11:- (*Valuable Assets*)

State the identity and location of each asset or account that has a value over \$1,000, including retirement accounts, deferred compensation, etc.

RESPONSE:

INTERROGATORY REQUEST NO. 12:- (*Best Interest*)

If you contend that it is NOT in the child(ren)'s best interest for your spouse to be awarded the exclusive right to determine the primary residence of the children, please briefly identify the facts and documents that support your contention.

RESPONSE:

INTERROGATORY REQUEST NO. 13:- (*Video, Audio, Surveillance*)

If you have any videos, audios, or other surveillance that pertains to any of your contentions set forth herein relating to conservatorship, possession and access, support, or property division, please identify each by date collected, how collected, where it is stored, how long it is, and why it was collected.

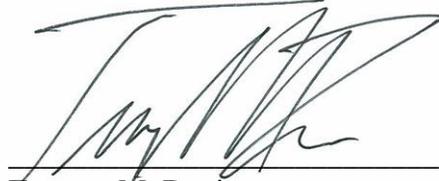
RESPONSE:

INTERROGATORY REQUEST NO. 14:- (*Monies paid to others*)

Identify all monies you have transferred to your family during the marriage.

RESPONSE:

Respectfully submitted,



Terence M. Davis
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ATTORNEYS FOR REQUESTING PARTY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing instrument has been served in accordance with the Texas Rules of Civil Procedure as indicated below on this 26th day of April 2019:


Terence Davis

VERIFICATION OF INTERROGATORIES

I _____, provide the attached Answers to Interrogatories and states under oath that all answers are true, subject to the following qualifications:

1. Answers to Interrogatory Nos. _____ are based on information obtained from another person.
2. Answers to interrogatories inquiring about persons with knowledge of relevant facts, trial witnesses, and legal contentions are not made under oath.

Affiant

SIGNED under oath before me on the ____ day of _____, 20__.

Notary Public, State of Texas