

Print out and prepare responses

I. **INSTRUCTIONS**

A. These are sample written questions that you might receive in your divorce. These questions are referred to as "Interrogatories". While the Interrogatories you receive may not be exactly like these, they will be substantially similar. Please read through these Interrogatories and prepare your responses, this will save you time and trouble in the future.

B. Below are the instructions for the actual Interrogatories.

(1) Each interrogatory should be answered separately upon the knowledge or upon the information and belief of the responding party, and any answer based upon information and belief should state that it is given upon such basis.

(2) If the complete answer to an interrogatory is not known, so state and answer as fully as possible each part of such interrogatory to which the answer is known.

(3) The following interrogatories shall be continuing to the full extent permitted under the applicable provisions of the Georgia Civil Practice Act.

(4) If any information is withheld under any claim or privilege, the following shall be provided with respect to such information: every person to whom such information has been communicated by the responding party, and from whom such information was learned by the subject matter of such information, and the basis upon which such privilege is claimed.

II. **DEFINITIONS**

(1) As used herein, the word "Spouse" shall mean your spouse, including all officers, attorneys, agents, employees and representatives acting on your spouse's behalf, its predecessors and/or successors.

(2) As used herein, the word "You" shall mean you, including all officers, attorneys, agents, employees and representatives acting on your behalf.

(3) As used herein, the words "you" or "your" shall refer to You as defined hereinabove.

(4) As used herein, the words "every document" shall mean every writing or record, however produced, reproduced or preserved, including, but no limited to every book, pamphlet, periodical, letter, memorandum, telegram, report, record, study, inter-office and intra-office communication, memorandum reflecting an oral communication, handwritten or other notes, working paper, draft, application, permit, chart, drawing paper, graph, survey, index tape, disc, data sheet, data processing card, computer print out and every other written, typed, recorded, transcribed, filed or graphic matter, except such documents as are immune from production under applicable law.

(5) As used herein, the word "person" shall include individuals, firms, partnerships, corporations, proprietorships, associations, governmental units and every other type of organization or entity.

(6) As used herein, the word "date" shall mean the exact day, month and year, if ascertainable, or otherwise the word "date" shall mean the best available approximation (including relationships to other events).

(7) As used herein, the word "identify", when used in reference to:

(a) An individual, shall mean to state his or her full name, present or last known residence address (designating which), and present or last known (designating which) business affiliation, job title and employment address.

(b) A firm, partnership, corporation, proprietorship, association or other organization or entity, shall mean to state its full name and present or last known (designating which) address and telephone number.

(c) A document, shall mean to state the title, if any, the date, author, sender, recipient, the identity of persons signing it, type of document (i.e. a letter, memorandum, book, telegram, chart, etc.) or some better means of identifying it, a summary of its contents, and its present location or custodian. In the case of a document within the possession, custody, control or access of You, whether You will make it available to the undersigned attorneys for inspection and/or copying; and, in the case of a document that was, but is no longer in the possession, custody or control of You what disposition was made or it, when and to whom.

III.
INTERROGATORIES

The following should be answered pursuant to O.C.G.A. §9-11-33 and all other provisions of the Georgia Civil Practice Act.

1.

1. Please state your full name, giving all previous names, if any, by which you have been known.
2. What is your date of birth?
3. Please state the country, state, county and city of your birth
4. Please list the following information with respect to your current residence and all locations at which you have previously resided since the date of your marriage to the present:
 - a. Address (street, apartment number, city, county and state);
 - b. type of residence (apartment, duplex, condominium, or single family dwelling);
 - c. Size of residence (number of square feet, number of bedrooms and number of bathrooms);
 - d. Beginning and ending dates of your residency at each location;
 - (e) other persons, besides yourself, including relatives and children, who now reside or have resided, including dates, with you at each location.
5. Please give the following information with respect to your educational background:
 - a. High School from which you graduated and year of graduation;
 - b. Name and location of each college and university which you have attended as student, giving beginning and ending dates of such attendance;
 - c. Any college or university degrees which you now hold, giving the date you received each degree, the college or university and field of concentration (i.e. major and minor);

- d. Any education or vocational training other than the above which you have received, giving the names of the school(s) or institution(s) and the beginning and ending dates of your attendance as a student.
6. With regards to employment since the date of marriage, please identify the following:
 - a. Your present and past employment;
 - b. Nature and description of your duties at each employment;
 - c. The gross income or earnings received from the employers listed on an annual basis;
 - d. If self-employed, please identify the nature of your work;
 - e. Do you have plans to change your present employment in the foreseeable future;
 - f. Have you interviewed or consulted with anyone concerning a change in your employer or employment status within the past six (6) months. If so, please identify the future employer or employment;
 - g. If not employed, do you have any skills or training which will enable you to obtain a job;
 - h. If not employed, have you ever attempted to obtain employment, and if so, please identify whom and/or where you made such attempt.
7. Please list each and every source of income you have had since the date of marriage, including, but not limited to, identifying the source, the salary or wages, commission and bonuses received by you in each employment, interest, dividend and the amount of your gross income as shown on your Federal Income Tax return, W-2 or 1099; or, if self employed, the name of any business interest from which you drew an income, and the amount of the draw.
8. Do you have the use or possession of an automobile or other motor vehicle? If so, please state the style, make and model of each automobile and the name of the respective owner.
9. Do you have the need of an automobile for personal transportation?

10. Are you a member of any social or civic organization? If so, please identify each such organization and the beginning and ending dates of membership.
11. Are you a member of a professional or business organization or club? If so, please identify each such organization(s) or club(s) and the beginning and ending dates of membership.
12. Do you have children born of this marriage with your spouse? If so, please answer the following:
 - a. Identify each child;
 - b. Birth date of each child;
 - c. Birthplace of each child;
 - d. School, kindergarten or nursery attended by each child.
13. Do you have children born of a previous marriage or relationship with anyone other than your spouse? If so, please answer the following:
 - a. Identify each child;
 - b. Name, age and birth date of each child;
 - c. Current custodian of each child;
 - d. Identify each person with whom you had the child with giving the name, address and age of that person.
14. Has any one of your children attended a private school? If so, please state the child, identify the school, giving the beginning and ending dates of attendance and the tuition.
15. Please list all charge accounts or credit cards which you now use or of which you have possession or control, including, but not limited to, the average monthly balance due for each of the listed accounts or cards for since the date of marriage.
16. Where do you normally buy clothing for your self and your children?
17. What amount of money did you spend on clothing each year since the date of marriage for clothing for yourself and the children?

18. Have you taken any vacations or trips since the date of marriage? If so, please identify where you went, with whom and what your expenses were.
19. What percentage of your meals are taken in your home, and what percentage are taken outside the home?
20. Please give the following information with respect to your leisure time activities:
 - a. Do you have hobbies or participate in recreational activities?
 - b. What do you typically do in your leisure time?
 - c. Do you own recreational equipment or vehicles (e.g. golf clubs, camping equipment, boats, vehicles, etc...)?
21. Please give the following information with respect to your health and physical condition:
 - (a) What is the present condition of your health?
 - (b) Are you now under the care of a health care professional? If so, please state the condition for which you are being treated.
 - (c) When was the last time you consulted with a health care practitioner?
 - (d) Do you have an immediate need for health care attention? If so, please state the condition for which you need treatment.
 - (e) What did you spend for personal medical services in the past year?
 - (f) Do you have a foreseeable need for dental services? If so, please state the condition for which you need treatment.
 - (g)
 - (h) What did you spend for dental services in the past year?
22. Please describe any real property you now own or have owned or have any interest in at any time since the date of this marriage to the present. Your description should include, but not limited to, the nature of your interest, the address, including a complete legal description thereof; the method of acquisition of interest; the date of acquisition; the purchase

price; what portion of the purchase price was in cash and what portion was financed; and the present balance due on the purchase price.

23. Please state whether, as of the date of your receiving these interrogatories, you have any interest in an option to acquire an interest in real property. If so, please state the terms of the option(s), the optionee(s), and give a description of the real property subject to each option.
24. Please list all transfers of property, both real and personal, which you have made since the date of marriage to any individual or legal entity, describing the property transferred, the date of the transfer, to whom the such property was transferred, the consideration paid by such transferee and the consideration paid by you at the time of acquisition of each property.
25. Please list each corporation in which you own stocks, bonds debentures, franchises or operating rights, or of which you may be the payee of any note. With respect to each corporation, please give the following information:
 - a. If you own stocks, state the number of shares of each class outstanding and the number of shares of each class held by you. List the total amount of dividends you have received on each of these stocks.
 - b. If you own debentures, state the total number and denomination of debentures held by you. Also state the terms of the debentures, including the date of maturity and annual interest or coupons.
 - c. If you hold bonds, state the total number and denomination of bonds held. Also, state the terms of the bonds, including the date of maturity and annual interest or coupons.
 - d. If you hold a franchise or other operating rights, please state in detail the nature of each franchise or operating right, including when and where acquired.

- e. If you have any other type of claim against any corporation, whether represented by a note or otherwise, state the nature of the claim, the amount of the claim, and how evidenced with respect to each corporation concerned.
 - f. State the date of acquisition by yourself with respect to any stocks, bonds, debentures, notes or other claims or evidence of indebtedness listed in response to this question.
 - g. If any of the stocks, bonds, debentures, notes or other evidence of indebtedness listed in the answer to this question are pledged as collateral, or otherwise used as security by you, state what is pledged, to whom pledged, and the amount of the debt for which it is pledged or used as collateral, as well as the date of the pledging.
26. Please identify all municipal bonds owned by you as of the date of filing these answers; please state the date of acquisition, purchase price, maturity date, and interest rate with respect to such bonds.
- a. If you owned municipal bonds at any time during the marriage, or acquired thereafter, which you no longer own, state the date of acquisition, purchase price, date upon which your title was divested, whether by gift, sale or other transfer, and the consideration received, if any.
 - b. If any of the bonds listed in answer to this question are pledged as collateral, or otherwise used as security by you, state what is pledged, to whom it was pledged, and the amount of the debt for which it is pledged or used as collateral as well as the date of pledging.
27. With respect to any business venture, whether it be a corporation, a general or limited partnership, sole proprietorship, joint venture, trust, or otherwise, in which you have a financial interest or from which you have received income, please state the following:

- a. The name and principal location of the business, the financial interest which you have, the date or dates the interest was acquired and the consideration paid;
 - b. The names and addresses of all other persons having a substantial interest in such business and the ratio or proportion that your interest has to the interest of all others therein;
 - c. If any such business has an interest in real property, list such holdings, giving the date of acquisition and acquisition price. Describe the improvements, if any, on such real property.
 - d. Attach the two (2) most recent operating statements and annual balance sheets, or similar financial reports, with respect to each business venture;
 - e. If you owned an interest since the date of marriage, or acquired an interest thereafter, but did not own an interest as of the date of filing these interrogatories, state the name and principal location of such business, the date on which such interest terminated, whether by gift, sale or otherwise, and the consideration received with respect to each business.
28. Have you paid a fee a stockbroker or investment counselor within the past two (2) years? Is so, please state the name of each person or company and the amount paid.
29. Please state whether or not you own an interest in oil or gas wells? If so, please state the following:
- a. The fair market value of you investment;
 - b. The names of all other individuals or legal entities having an interest in the involvement;
 - c. The amount of income received by you from your interest since the date of marriage.

30. Please list all loans made by you to any person(s) other than corporations which have not been satisfied as of the date of filing these Interrogatories, and state the following with respect to such loan(s):
 - a. Identify the borrower, the amount loaned, the terms of the loan, including interest rate and manner of payment, the amount due, both interest and principal;
 - b. If any loans are secured by collateral, describe the collateral securing such loan.
31. Do you have or have property located in a safe-deposit box(s), safes, vaults, or other places of safekeeping valuable papers. If so, please:
 - a. List the location of all safe-deposit boxes, safes, vaults, or other places of safekeeping valuable papers in the name of or used by yourself as of the date of filing these interrogatories;
 - b. Prepare an itemized inventory of all items kept in the place described in "a" above;
 - c. Identify the owner or holder of the place described in "a" above
32. Please prepare an itemized inventory of all your stocks, bonds, securities, notes, receivables, deeds jewelry and other valuable papers and items not included in the answer to the preceding interrogatory, and indicate the place where such item(s) are located.
33. Please describe any savings, checking, or commercial accounts in your name solely or jointly with others, with any bank, or financial institution since the date of marriage you have had. Your description should identify the bank or financial institution; type of account; the names on the account; the name and present address if such information as is known to you concerning all persons authorized to withdraw from the account; the account number; the amount of the present balance in each account thirty (30) days prior to the filing of these interrogatories.
34. List all cash (in excess of \$500.00) which was at any one time given or transferred since the date of this marriage to any relative by blood or

marriage, or any other individual or legal entity. State the date of such transaction, identify the recipient, the amount involved and the purpose for which such transfer was made.

35. Please describe any assets which you, within six (6) months prior to the filing of the pleading for divorce to the present date sold, transferred, or encumbered. Your description should include, but not limited to a description of the asset or assets that were sold, transferred, or encumbered; the date of each transaction; and the party, firm, or agent who acquired your asset or assets.
36. Please list all transfers, gifts, or other acts whereby custody or possession of property, real or personal, was transferred by you to any trust since the date of marriage. With respect to such transfers, state the date of the transfer, the beneficiaries of the trust, and the acquisition cost of the transferred property to you.
37. Please list any trust created by you, stating the date of its creation, the names of the trustees, the beneficiaries, the terms of the trust, including the date or event upon which it will terminate and the amount and source of the corpus of the trust.
38. List any trust(s) not included in the answers to the two preceding Interrogatories of which you are a trustee. Please state the date of creation, names of the other trustees, the beneficiaries, the terms of the trust(s), including the date or event upon which it will terminate and the amount of the corpus of the trust(s).
39. Please list any trust(s) of which you are a beneficiary, and with respect to such trust(s), please state the following:
 - a. The amount and original source of the trust corpus;
 - b. The annual income of the trust(s) for the past 2 years, the amount of income distributed to the beneficiaries, and the amount received in each of the last two (2) years by each beneficiary;

- c. The date of any encroachment of trust corpus paid to or used for the benefit of yourself.
40. Please list any estate, will and testament of which you have been an heir, devisee, legatee, or have in any way received property. With respect to such estate, please state the following:
 - a. Identify the decedent, date of death, decedent's relation to you, if any;
 - b. Identify the executor or administrator or personal representative;
 - c. All property, real or personal, which was received by you, or to which you are entitled;
 - d. Identify all other persons who have received property from such estate.
41. Please list all estates not included in the response to the preceding Interrogatory for which you are an executor or administrator or personal representative or have held such position since the date of this marriage.
42. Please describe any interest you may have in any life insurance or annuity policy, including retirement. Your description should include, but not limited to, the name and address of the insurance company; the type of policy (e.g., term, whole life, variable, etc.); the date on which the policy was issued; the face amount of the policy; the amount of the annual premiums; the surrender value, if any, as of the date of filing these answers to this Interrogatory; the name and address of each owner of the policy; the date of assignment of the policy and the name of each assignee, if the policy has been assigned; and the date of any change of beneficiary(ies) effected by you as to the policy.
43. Please list all current loans to your self from any bank or lending institution. With respect to each loan, please identify the lender, the date of the loan, the terms of the loan and the purpose of the loan.
44. Please identify any and all financial statements you have compiled and/or submitted to any bank, mortgage company or other lending institution

including the date the financial statement was submitted and purpose for submitting same.

45. Please state whether or not you have filed income tax returns with the State and Federal governments for each year since the date of marriage. If so, please state the following (or attach a complete copy of the returns):
 - a. Place of filing;
 - b. Your gross income;
 - c. Amount of deductions claimed by you;
 - d. Your taxable income;
 - e. Tax paid or refund given.
46. Please describe any personal property or real property or sum of money which you claim as your separate property. Your description should include, but not limited to: a description of the property; the present value of the property; the date and method of acquisition of the property; the source of the funds used to acquire the property; the name of each owner of the property and the respective ownership interests; the facts upon which you base the claim that the property is your separate property.
47. Please state the names, present addresses and telephone numbers concerning all persons known to you or your attorney(s) who will or may be called as witnesses in this action.
48. If you intend to call any expert or technician as a witness as the trial of this action, please state the subject matter on which the expert is expected to testify and, state in detail, the opinions held by such expert or technician and give a complete summary of the grounds for each opinion held.
49. Please describe in detail what, if any, grounds you have for divorce against your spouse, or what, if any, complaints you now have against your spouse as a spouse or parent.

50. If you are claiming you should be awarded custody of the minor children, please list each and every reason why:
 - a. You should be awarded custody; and
 - b. Your spouse should not be awarded custody.
51. Have you had sexual relations with any person, other than your spouse, since the date of marriage. If so, please:
 - a. Identify the person with whom you had sexual relations;
 - b. Approximate date(s) of those sexual relations;
 - c. Where those sexual relations occurred (State, county, city, hotel, motel, or other place).
52. Please identify each person who has assisted in the preparation of the answers to these Interrogatories, the capacity in which he/he assisted and the assistance given.