

Name of Petitioner/Plaintiff  
Address of Petitioner/Plaintiff  
City, State, Zip  
Phone

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**IN THE CIRCUIT COURT FOR  
\_\_\_\_\_ COUNTY, STATE OF FLORIDA**

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<b>YOUR NAME,</b>	)	
	)	<b>PLAINTIFF'S FIRST SET OF</b>
<b>,Petitioner/Plaintiff</b>	)	<b>INTERROGATORIES PROPOUNDED</b>
	)	<b>TO THE DEFENDANT WITH</b>
	)	<b>REQUEST FOR PRODUCTION</b>
	)	
<b>Vs.</b>	)	
	)	<b>CASE NO. _____</b>
	)	
<b>DEFENDANT'S NAME,</b>	)	
	)	
<b>,Respondent/Defendant</b>	)	

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COMES NOW \_\_\_\_\_ ("Plaintiff") and propounds the following interrogatories to \_\_\_\_\_ ("Defendant") pursuant to Florida Rules, and other applicable provisions of said Rules, and gives notice that each and every interrogatory or section thereof is to be answered separately, in writing, under oath of the aforesaid Defendant within the legal number of days of the date of service hereof, and further gives notice that these interrogatories and request for production of documents and things are deemed to be continuing, and, that if different or additional information is received by Defendant after answers hereto are submitted and filed, same is to be provided to this Plaintiff in writing. Production requests are also made pursuant to the rules of Florida. Plaintiff requests that Production of documents be made on the same date as the date Answers to Interrogatories are due and shall be made to Plaintiff at the following address:

\_\_\_\_\_.

**INTERROGATORY NO. 1**

State your full name, social security number, date of birth, residence address, and telephone number.

INTERROGATORY NO. 2

Please attach to your answer to these interrogatories copies of your income tax returns and W-2 forms for the past three years.

INTERROGATORY NO. 4

State your total income to date since \_\_\_\_\_, and attach to your answers copies of your last five paycheck stubs.

INTERROGATORY NO. 5

List all assets presently owned by you. Give a complete and detailed listing. For each asset, give its nature, description, location, date of acquisition, present market value, and the name and address of any person that you hold same with jointly.

INTERROGATORY NO. 6

List the name, place of employment and telephone number of any person or persons who are presently residing at the address which you listed as your residence in your answer to Interrogatory No. 1.

INTERROGATORY NO. 7

If you rent the place in which you live, give the name of your landlord, his or her address and telephone number.

INTERROGATORY NO. 8

Outline in detail your monthly living expenses.

INTERROGATORY NO. 9

List all other income received by you other than from your employment, stating the source and the amount.

INTERROGATORY NO. 10

If you claim to have grounds for divorce against the Plaintiff, please state all circumstances, facts, and events, upon which you base such grounds.

INTERROGATORY NO. 11

What safety deposit boxes do you currently maintain whether alone or jointly held? For each box, state the name and address of the bank, the box number, the name in which said box is

maintained, the name and address of each and every person having access thereto, the contents of each box, and the date each box was acquired.

INTERROGATORY NO. 12

What bank accounts, if any, do you presently maintain, whether alone or jointly held? For each account, state whether active, inactive or closed, the style of the account, the name of the bank or banks, the name and address of each and every person authorized to make withdrawals therefrom, the account number, and whether checking or savings.

INTERROGATORY NO. 13

Do third parties hold any property in trust for you or for your benefit? If so, give full and complete particulars, including the name and address of said persons and exact descriptions and locations of property.

INTERROGATORY NO. 14

Have you ever been arrested? If so, for each occasion, state the date of the arrest, the county and state in which the arrest occurred, and the reason for such arrest.

INTERROGATORY NO. 15

Have you ever received psychiatric treatment? If so, state the physician administering same, his address and telephone number, and the date or dates of the treatment.

INTERROGATORY NO. 16

Are you taking any drugs, and the amount of money you spend each month for said drugs.

INTERROGATORY NO. 17

Do you use any type of drugs which are not prescribed by a physician (i.e., marijuana, heroin, cocaine)? If so, state the type of drug or drugs which you use, the place in which you exercise such use, when you began using said drug or drugs, and the amount of money you spend each month for said drugs.

INTERROGATORY NO. 18

Do you consume alcoholic beverages on a regular basis? If so, state the type of alcoholic beverage which you consume, and the amount of money you spend each month on said alcoholic beverages.

INTERROGATORY NO. 19

Are you addicted to alcohol or drugs of any kind? If so, specify what it is you are addicted to and when you became addicted to same.

INTERROGATORY NO. 20

Have you ever had sexual relations with anyone other spouse during the course of your marriage? If so, name and address of each individual, and the time of each sexual encounter.

INTERROGATORY NO. 21

State whether or not you have provided any banks or other lending institutions with financial statements during the past 24 months. For each such occurrence, state the names and addresses of the banks or lending institutions, and the date said financial statement was provided.

INTERROGATORY NO. 22

For each person you shall call as a witness at the trial of this case, please state: the witness's name and address, whether employed by you, and the subject matter to which the witness shall testify. Prior to trial, please supplement your answer to this interrogatory.

INTERROGATORY NO. 23

For each person you allege to be an occurrence witness of any of the things and matters sought to be proved by you at the trial of this case, please state: the witness's name and address, whether employed by you, and the subject matter to which the witness shall testify. Prior to trial, please supplement your answers to this interrogatory.

INTERROGATORY NO. 24

For each person whom you expect to call as an expert witness at the trial, providing his name, address and telephone number, please state:

- a. The subject matter in which identified is expected to testify.
- b. The substance of the facts and which each expert is expected to testify.
- c. Give a summary of the grounds for each person set out above.

d. State the educational background, educational training, and experience of each person above which qualifies him as an expert, and identify the field of such expertise.

INTERROGATORY NO. 25

For each document or other item you shall offer as an exhibit at the trial of this case, please state: the title or name of the document, date of the document and purpose for which it will be used as an exhibit.

INTERROGATORY NO. 26

State the names and addresses of all persons involved in the answering of these interrogatories.

INTERROGATORY NO. 27

Have you, as the Defendant in this case, read the answers to each and every one of the above interrogatories and requests for production of documents and things, and do you state that the answers thereto are true, complete, responsive and correct?

INTERROGATORY NO. 28

If, at any time between this date and the date of the trial of this cause, you come into possession of information which, if such information were known to you, would properly have to be disclosed in the answers to these interrogatories or requests for production of documents and things, or any of them, will you disclose such newly discovered information, if any, to Plaintiff within fifteen days after such information comes into your possession or prior to the trial, whichever is first?

Respectfully submitted,

\_\_\_\_\_  
Signature of Plaintiff  
NAME: \_\_\_\_\_

CERTIFICATE OF SERVICE

I, the undersigned, \_\_\_\_\_, Plaintiff, do hereby certify that I have this day mailed, by United States mail, postage prepaid, a true and correct copy of the above and foregoing Plaintiff's First Set of Interrogatories to Defendant at:

Name of Defendant  
Address

DATED, this the day of \_\_\_\_\_, 20\_\_\_\_.

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Signature of Plaintiff

Name of Petitioner/Plaintiff  
Address of Petitioner/Plaintiff  
City, State, Zip  
Phone

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**IN THE CIRCUIT COURT FOR  
\_\_\_\_\_ COUNTY, STATE OF FLORIDA**

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**YOUR NAME,** )  
 ) **NOTICE OF SERVICE OF**  
 ) **DISCOVERY**  
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 ) **,Petitioner/Plaintiff** )  
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 )  
 ) **Vs.** )  
 ) **CASE NO. \_\_\_\_\_**  
 )  
 ) **DEFENDANT'S NAME,** )  
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 )  
 ) **,Respondent/Defendant**

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TO: All Counsel of Record:

Notice is hereby given that Plaintiffs have this date served in the above entitled action:

**PLAINTIFF'S FIRST SET OF INTERROGATORIES PROPOUNDED TO THE  
DEFENDANT WITH REQUEST FOR PRODUCTION**

The undersigned retains the originals of the above papers as custodian thereof pursuant to  
Court Rules.

DATED:

Respectfully Submitted,

By:

\_\_\_\_\_  
Signature of Plaintiff

**CERTIFICATE OF SERVICE**

I, \_\_\_\_\_, Plaintiff in the above referenced civil action, do hereby certify that I have this day caused to be delivered, via United States Postal Service, first class postage prepaid, a true and correct copy of the above and foregoing document to:

Defendants Name  
Address

THIS the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Signature