

100<sup>TH</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF BLACK ACRE  
STATE OF LOUISIANA

NO. 123-456

DIVISION "A"

JANE DOE,

Petitioner,

-versus-

JOHN DOE,

Defendant.

FILED: \_\_\_\_\_

\_\_\_\_\_  
DEPUTY CLERK

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS<sup>1</sup>**

**TO: JANE DOE  
Through her attorney of record  
Support Inc.  
Attorneys at Law  
123 Canal Street  
Black Acre, Louisiana 70000**

**INTERROGATORIES**

You are hereby notified that the petitioner in the above captioned matter, pursuant to Louisiana Code of Civil Procedure Articles 1457, *et seq.*, the following written interrogatories, to be answered fully in writing, under oath, and signed by respondent, within fifteen (15) days of service hereof.

These interrogatories are deemed to be continuing in nature and pursuant to Article 1428 of the Louisiana Code of Civil Procedure you are hereby requested to supplement your answers as any new or additional information is obtained.

In the following interrogatories:

I.

- A. " You" and "Your" means each said party in his, her, or its capacity and any servants, agents, contractors, attorneys and employees an all other persons acting or purporting to act for, and on behalf of said Party.
2. Document. The word "document" as used herein includes, but is not limited to all physical forms of correspondence, letters, transcripts, minutes, telegrams, cables, tapes, recordings, films, memoranda, work papers, notes, drafts, press releases, diaries, employment records, time records, requisitions, resolutions, certificates, opinions, analyses, other analyses, ledgers, journals, pages, books or records of account, contracts, agreements, promissory notes, instruments of indebtedness, endorsements, accounts, statements, purchase orders, receipts, invoices, shipment records, delivery records, balance sheets, income statements, financial statements, statistical records, notices, assignments reports, valuations, evaluations, and any other writings regardless of by

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<sup>1</sup> The United States Supreme Court has held that the allegations of a pro se litigant's pleadings are to be held "to less stringent standards than formal pleadings drafted by lawyers." *Haines v. Kerner*, 404 U.S. 519, 520, 92 S.Ct. 594, 30 L.Ed.2d 652 (1972). Article 865 of the Louisiana Code of Civil Procedure mandates that every pleading shall be construed as to do substantial justice.

whom prepared, or to whom addressed, and regardless of whether the document is an original or a copy, or whether sent or received.

The term document shall also include any other form of reporting, storing, maintaining or indexing information including, but not limited to, electronic, computer, magnetic microfilm or microfiche storage, shorthand notes, diagrams, magnetic cards and other forms of storage.

3. Identify. As used herein, the word “identify” as it refers to documents shall mean to state the:
    - (a) title of the document;
    - (b) name(s) and address(es) of the author(s) of the document;
    - (c) name(s) and address(es) of the sender(s) of the document;
    - (d) name(s) and address(es) of the person(s) to whom the document was addressed;
    - (e) all of the persons known to the respondents have seen the document or participated in communication about the document;
    - (f) date of the document;
    - (g) date upon which the document was received by those having possession of the document; and
    - (I) brief description of the nature and subject matter of the document.
  4. “Person” as used herein, includes in the plural, as well as the singular, without limitation, any natural person, governmental agency or officer, and any “business entity.”
  5. “Identify” or “Identity” used in reference to a natural “person” herein means to state his or her full name, present address if known, present or last known position at a business affiliation and “identity” of said business entity, address thereof, and his or her address during the period in question.
  6. “Business Entity” as used herein, includes the plural as well as the singular, without limitation, any corporation, firm, partnership, joint venture, association, business trust, sole proprietorship, labor union, estate, trust, or any organization for the conduct for business or commerce, or for holding title to property, real, personal, or mixed, or for the conduct of any service, whether business, charitable, commercial, religious, scholastic or otherwise.
  7. “Identify” or “Identity” used in reference to any “business entity” herein, whether it has been identified as an individual or natural “person,” means to state its name,; the name(s) under which it does business; whether it is a corporation, or if it is not, general partners, associates, trustees, joint venturers, or owner(s), the address of its principal business office, the address of its registered office (if different from its principal business office) if any; and the nation, state or province of its incorporation if known to you.
- H. “Describe in detail” as used herein means to:
1. Describe fully by reference to underlying facts rather than ultimate facts or conclusions of fact or law; and,

2. Particularize as to:
  - a. Time;
  - b. Place;
  - c. Manner;
  - d. "Identity" of the "persons" or "business entities" involved.

II.

You may satisfy your duty hereunder to respond to any Interrogatory requiring you to identify a document by attaching to your responses to these interrogatories a legible copy of any such document bearing the notation of the interrogatory to which the attached document is responsive. The Respondent shall contact the attorney prior to the production or reproduction of voluminous or excessively costly items or documents in lieu or in furtherance of a response, so that the parties can ascertain and allocate among themselves any extraordinary expenses incurred.

III.

With respect to any oral communication which is referred to or relied upon in responding to these interrogatories, or which is a source of, or forms any basis for such response, "identify" oral communication shall mean:

1. Describe the same in detail;
2. Describe how the communication occurred (e.g., in person, by telephone, etc.);
3. Furnish the substance of what each party to the communication said; and,
4. Whether any document exists which sets forth, summarizes, or otherwise refers to the substance of the communication, and, if so, provide the information concerning any such document called for in Instruction 1, C, above.

IV.

Supplementation. The respondents shall amend, supplement, complete or otherwise correct any and all answers as required by Article 1428 of the Louisiana Code of Civil Procedure.

V.

Non-Disclosure. With respect to any information that the respondent with holds, does not disclose, or exerts a claim of privilege of non-disclosure, a statement shall be provided by respondent's counsel which:

- (a) identifies any and all persons who possess the information with held;
- (b) generally describes the information with held;
- (c) gives the last known physical location of the information with held; and,
- (d) sets-forth the statute, rule, decision, or other basis which is claimed to warrant the privilege or other justification for the non-disclosure of the requested information.

## VI.

Plural/Gender. As used herein, any use of the singular shall include the plural, and the plural the singular. Any words connoting the masculine gender shall include the feminine and the non-gender, (it), the use of the feminine shall include both the masculine and the non-gender, and the use of the non-gender shall include both the masculine and the feminine.

### **INTERROGATORY NO. 1:**

Please state your complete name, address, date of birth, Social Security number, and driver's license number including the state issuing said license.

### **INTERROGATORY NO. 2:**

Please state the name, address, and telephone number for each and every witness you may call to testify at the trial of this matter and for each state:

- a) whether or not said witness will give expert testimony;
- b) the substance of the witness's expected testimony;
- c) his/her relationship to the defendant, if any.

If your answer to this interrogatory is that this inquiry is premature, then please list each and every witness whom you currently intend to call at the trial of this matter.

### **INTERROGATORY NO. 3:**

Please identify each and every exhibit, document, writing, contract, record, correspondence, memorandum, report, or other item of physical evidence which you intend to introduce at the trial of this matter. If your answer to this interrogatory is that this inquiry is premature, then please list each and every exhibit, document, writing, contract, record, correspondence, memorandum, report, or other item of physical evidence that you currently intend to introduce at the trial of this matter.

### **INTERROGATORY NO. 4:**

Please provide an itemized and detailed list of all of your personal assets, including for each such property the purchase price and the present value. Assets include, but are not limited to, the following: immovable property (real estate), household furnishings, automobile, boats, mobile homes, airplanes, or other vehicles; pension, retirement or similar type of plan (defined contribution or defined benefit plans); stocks and bonds, CD's other securities, or investment accounts; insurance policies with a cash value; notes, contracts, options; livestock; tools and equipment of any kind. Pursuant to Louisiana Revised Statutes 9:315(C)(4)(c) the mover is entitled to include any income from personal assets.

### **INTERROGATORY NO. 5:**

Please itemize with numerical particularity your monthly income for the calendar years of 2001, 2002, 2003 and up to the date of your answers to these interrogatories. Please include in your answers any and all deviations and/or variances in your monthly income and reasons for such. Pursuant to Louisiana Revised Statutes 9:315.2 the mover is entitled to the information contained on the tax returns for the two previous calendar years, i.e. 2001 and 2002.

### **INTERROGATORY NO. 6:**

Please state the name, address, and telephone number(s) of any and all of your employers since January 1, 2000. In so doing, please state the date you commenced your employment with your present employer(s), your present rate of gross monthly pay, and the date upon which that rate was established; your net pay and itemization of payroll deductions, and the date upon which those rates were established; the day or dates and frequency of your pay days; and for each of your last six pay periods, please state your gross pay, net pay, and the amount and purpose of each deduction from your pay.

### **INTERROGATORY NO. 7:**

Please state whether your employer/company pays for, or reimburses, your entertainment, food, travel, automobile, and/or any and all other expenses. If so, please state: the manner in which you are reimbursed; for which expenses are you reimbursed; and whether you retain records of expenses and reimbursements. The mover is entitled to this information pursuant to Louisiana Revised Statutes 9:315(c)(4)(b).

**INTERROGATORY NO. 8:**

Please state the average amount of hours you are employed on a weekly and monthly basis, including any variance in your schedule and the reasons for such. In addition, please include the minimum and maximum amount of hours worked on a daily basis.

**INTERROGATORY NO. 9:**

Please list each checking, commercial banking, savings, credit union, or other depository account, or accounts of any and every nature in which you have an interest, both individually and for any business or corporation owned in whole or in part, or over which you have signature authority, showing as to each such account the name and address of the institution and the account number.

**INTERROGATORY NO. 10:**

Please itemize with numerical particularity all of your monthly expenses, including any and all specialized, seasonal, and everyday expenditures you incur and/or expect to incur in the future. Pursuant to Louisiana Revised Statutes 9:315(C)(4)(3) Expenses are relevant as they may constitute gross income as defined under the statute, specifically, to the extent that they reduce the parent's personal living expenses. Without this information we are unable to calculate gross income.

**INTERROGATORY NO. 11:**

Please describe with specificity and particularity, any and all interest that you have in any business enterprise including, but not limited to, the relationship that you have to that corporation, the income that you generate from said corporation, and specify if you are an officer of said corporation.

**INTERROGATORY NO. 12:**

Please state the amount and type of your monthly expenses that are offset by anyone sharing your residence, or contributing in any other way, to your monthly expenses. If you are currently married this includes the income of your current spouse to the extent that it reduces your monthly expenses, so that information shall be provided pursuant to this interrogatory.

**INTERROGATORY NO. 13:**

Please identify and itemize any and all expenses of the minor child for which the child support obligation is in dispute, including, but not limited to, medical expenses, child care expenses, expenses for camp, private school tuition and required fees, book fees, and transportation expenses.

**INTERROGATORY NO. 14:**

Please provide a list and value of any and all stocks, bonds, debentures, time certificates, certificates of deposit, KEOGH plans, Individual Retirement Plans, real estate holdings, and any other items or objects of investments, in which you have an interest. Pursuant to Louisiana Revised Statutes 9:315(C)(4)(a) the mover is entitled to include any income any source including any and all stocks, bonds, debentures, time certificates, certificates of deposit, KEOGH plans, Individual Retirement Plans, real estate holdings, and any other items or objects of investments, in which he has an interest.

**INTERROGATORY NO. 15:**

Are you paying and/or receiving child support for any other children not born of the relationship between you and the defendant herein? If so, please identify the full name of the child, the date

of birth of the child, and the name of the parent paying child support, with the caption and docket number of the proceeding in which child support was awarded.

**These interrogatories shall be deemed continuing so as to require supplemental answers if you or your attorneys obtain further information between the time answers are served and the time of trial.**

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

You are hereby notified that the defendant in the above captioned matter, pursuant to Articles 1461 and 1462 of the Louisiana Code of Civil Procedure propounds the following Requests for Production of Documents commanding that you respond within fifteen (15) days to the following requests for production,. Said requests for production are continuing; therefore, as further information relative to these requests become available and is acquired, the mover specifically requests that supplemental responses regarding said information be provided immediately to the mover. In lieu of producing the originals of the documents requested, the respondent may provide true and clear copies of the same within fifteen days of service to:

JOHN DOE  
123 Maple Leaf Drive  
Black Acre, Louisiana 70000

In the following requests for production of documents:

“You” and “Your” means **JANE DOE**, and all representatives of any, and all persons acting for or on your behalf.

“Documents” means any original, duplicate copy, or draft of any written or recording of any nature, whether set down or reproduced by hand, typewriting, printing, photostating, photography, magnetic impulse, mechanical or electrical recording, or any other form of data compilation.

“Identify” or “Identification,” when used with reference to any document, means to state with particularity, the type of document, (e.g. letter, memorandum, notation, bill, record, receipt, etc.) And some means of identifying precisely its present location and custodian, the date if any, contained or displayed thereupon, or in lieu thereof, you may attach to your responses, a copy of each and every such document.

#### **REQUEST FOR PRODUCTION NO. 1:**

Any and all documents or other physical exhibits which you, or anyone on your behalf, intend to use or introduce as an exhibit or demonstrative evidence at hearing or trial of this matter, this request includes any and all impeachment or rebuttal exhibits.

#### **REQUEST FOR PRODUCTION NO. 2:**

Any and all photographs, audio tapes, videotapes, drawings, surveys, sketches, models, motion pictures, or other media of anything connected with this proceeding.

#### **REQUEST FOR PRODUCTION NO. 3:**

Any and all written, recorded, or transcribed statements made by you, any of the witnesses, including the defendant, and experts in this litigation.

#### **REQUEST FOR PRODUCTION NO. 4:**

Copies of any reports by experts. (NOTE: The “expert” as used in this request includes who, by way of education, expertise, or experience is viewed as being qualified to render any opinions or conclusions regarding any issues, allegations or contentions arising out of the captioned matter.)

**REQUEST FOR PRODUCTION NO. 5:**

Any and all documents that were referred to, or from which any information was gathered or construed from, to respond to the interrogatories propounded by the mover.

**REQUEST FOR PRODUCTION NO. 6:**

Please provide copies of any and all payroll records which you may have, including all payroll stubs, W-2 Forms, 1099 Forms, and income tax returns, indicating any and all sources of earnings and income for the past 48 months.

**REQUEST FOR PRODUCTION NO. 7:**

Please provide all records and/or pay stubs indicating any and all income received by you from any and all sources for the past 48 months to date, including reimbursable expenses, and direct and indirect payments, from any and all employers in your name or the name of your current spouse.

**REQUEST FOR PRODUCTION NO. 8:**

Please provide copies of the Federal and State income tax returns filed by you or on your behalf, individually or jointly, and for any business or corporation owned in whole or in part, or operated by you, together with all attachments and accompanying worksheets, including W-2 Forms, for the preceding three (3) years.

**REQUEST FOR PRODUCTION NO. 9:**

Please provide copies of any and all savings account records, pass books, money market, certificates of deposit and all other financial documents of any bank, homestead, savings and loan, credit union or any other financial institution standing in your name or in which you have a signatory power or interest for the past 3 years to present.

**REQUEST FOR PRODUCTION NO. 10:**

Please provide copies of all cancelled checks, deposits, debits, and statement in any bank, homestead, savings and loan, credit union or any other financial institution standing in your name or in which you have a signatory power or interest for the past 3 years to present.

**REQUEST FOR PRODUCTION NO. 11:**

Any and all birth certificates, adoption decrees, affidavits of acknowledgment, divorce decrees, paternity/DNA test results, and/or decrees of emancipation regarding your children and/or any child made subject to this litigation.

**REQUEST FOR PRODUCTION NO. 12:**

Any and all insurance policies that you have or had within the past three (3) years, including, but not limited to health, life, and dental.

**REQUEST FOR PRODUCTION NO. 13:**

Any and all medical bills regarding any party to this litigation and/or the minor children thereof.

**REQUEST FOR PRODUCTION NO. 14:**

Any and all documents and things indicating that you have paid and/or received child support payments within the past three (3) years.

**REQUEST FOR PRODUCTION NO. 15:**

Any and all documents and things evidencing that day-care, child care, tuition, camp, and/or educational expenses were paid and/or incurred associated with the children of the petitioner and defendant.

**REQUEST FOR PRODUCTION NO. 16:**

Copies of any and all applications for loans and/or credit applications and/or lease or apartment rental applications with accompanying financial statements prepared or submitted by you or on

your behalf and/or for any corporation, firm, company, enterprise or similar business entity in which you have or have had an interest for the period of January 1, 2000, to the date of the production of these documents.

**REQUEST FOR PRODUCTION NO. 17:**

Copies of all statements of any and all investments accounts, including but not limited to stocks, mutual funds, bonds, options, retirement, 401K, and pension plans in the name of you individually or jointly with any other person or any third party on your behalf and/or under your control, whether currently open or not from January 1, 2000, to the date of production of these documents.

**REQUEST FOR PRODUCTION NO. 18:**

Copies of all credit cards and charge accounts held by you, or jointly with any third party on which you have signature authority, and all statements and receipts received by you in connection with the use of such credit cards and charge accounts for the period January 1, 2000, to the date of production of these documents.

**REQUEST FOR PRODUCTION NO. 19:**

Any and all court documents or Louisiana Support Enforcement Services records documenting any and all child support awards that you are receiving. Please provide certified copies of any and all judgments of any court ordering that support be paid.

**These discovery requests are deemed to be continuing and respondents shall amend, supplement, complete or otherwise correct any and all answers as required by Article 1428 of the Louisiana Code of Civil Procedure.**

Respectfully Submitted,

JOHN DOE  
123 Maple Leaf Drive  
Black Acre, Louisiana 70000  
(504) 555-1212

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JOHN DOE  
In Proper Person

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing pleading on all counsel to this proceeding by facsimile transmission, hand delivery, or by placing same in the U.S. mail, first class, postage prepaid, this \_\_\_\_\_ day of \_\_\_\_\_, 2004.

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JOHN DOE