

Prince William County JDR Model Interrogatories (Custody/Visitation)

VIRGINIA:

**IN THE JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT
OF PRINCE WILLIAM COUNTY**

| | | |
|-------------|---|-------------------|
| _____, |) | |
| Petitioner, |) | |
| |) | |
| v. |) | Case No. JJ _____ |
| |) | |
| _____ |) | |
| Respondent. |) | |

To: {Party}
c/o: {Counsel}

INTERROGATORIES

The following Interrogatories are directed to you pursuant to Rules 4:0 et seq. of the Rules of the Supreme Court of Virginia. You are requested to answer these Interrogatories fully, in writing and under oath, and to serve a copy of your answers upon the undersigned counsel within twenty-one (21) days after service of these Interrogatories.

Definitions and Instructions

a. These Interrogatories are continuing in nature as provided in Rule 4:1(e)(1) and (2) so as to require the filing of supplemental answers without further request should additional information, or information inconsistent with the information contained in the answers to these Interrogatories, become available to the party to whom these Interrogatories are directed.

b. The word “**person**,” used in these Interrogatories, includes both the singular and plural, and includes legal entities and organizations as well as individual people.

c. Where the **identity** or name of a person is requested, state in your answer the full name of the person, present or last known home address and business address, electronic mail address, and daytime telephone number.

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d. Any requested information, unless privileged, which is known by any of your attorneys, accountants or other agents, acquired while acting on your behalf, shall be given in response to these Interrogatories. To the extent you do not know the precise information requested, provide your best estimate thereof.

e. If additional space is required to fully answer, please continue answer on a separate sheet of paper properly identified (e.g., “continuation of answer to interrogatory number 7”).

f. Interrogatories numbered “ # (M)” are taken from the Model Interrogatories approved by the judges of the Prince William County Juvenile and Domestic Relations District Court. As such, no objections as to the form of Model Interrogatories will ordinarily be sustained by the judges of the Prince William County Juvenile and Domestic Relations District Court.

THE FOLLOWING INTERROGATORIES ARE FOR USE IN CASES

INVOLVING ISSUES OF CUSTODY AND/OR VISITATION

1(M) Specifically identify what relief you are requesting regarding custody and/or visitation in this case, setting forth your proposed calendar showing when each party should have the child during the coming year and proposed transportation arrangements,. Show all holidays, summer vacation, etc.

ANSWER:

2(M) The factors set forth below are derived from §20-124.3, Code of Virginia, and are considered by the Court in awarding custody and/or visitation. State which, if any, of the below factors are at issue in your case and state all facts that support your claim that the factor is important for the Court to consider in awarding custody and/or visitation.

- a. The age and physical and mental condition of the child, giving due consideration to the child’s changing developmental needs;
- b. The age and physical and mental condition of each parent;
- c. The relationship existing between each parent and the child, giving due consideration to the positive involvement with the child's life, the ability to accurately assess and meet the emotional, intellectual and physical needs of the child;

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- d. The needs of the child, giving due consideration to other important relationships of the child, including but not limited to siblings, peers and extended family members;
- e. The role which each parent has played and will play in the future, in the upbringing and care of the child;
- f. The propensity of each parent to actively support the child's contact and relationship with the other parent, including whether a parent has unreasonably denied the other parent access to or visitation with the child;
- g. The relative willingness and demonstrated ability of each parent to maintain a close and continuing relationship with the child, and the ability of each parent to cooperate in and resolve disputes regarding matters affecting the child;
- h. The reasonable preference of the child, if the court deems the child to be of reasonable intelligence, understanding, age and experience to express such a preference;
- i. Any history of family abuse;

ANSWER:

3(M) Please state the role you have played in each child's life with respect to his/her upbringing and care and the role you anticipate you will play in the future.

ANSWER:

4(M) Describe your current residence, including the type of residence (e.g., single family home, townhome, apartment), number of bedrooms, and the sleeping arrangements for each household member when the child is at your residence overnight.

ANSWER:

5(M) Describe the general condition of your health at present.

ANSWER:

6(M) If you or any other person residing in your household has ever been charged with a crime (other than a traffic infraction) then for each charge give:

- a. The identity of the person:
- b. The date of the charges:
- c. A description of the offense:
- d. What plea was entered:

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- e. The final outcome of the case:
- f. The punishment imposed:

ANSWER:

7(M) Has the Department of Social Services, Child Protective Services or any other government agency ever investigated an abuse or neglect claim against you or any other person residing in your household? If so then for each such claim provide:

- a. The identity of the entity or agency:
- b. The date of the claim:
- c. A description of the offense:
- d. The outcome of the matter:
- e. Any punishment or consequence to the person against whom the claim was made:
- f. The identity of any other person with knowledge of the facts stated in response to this interrogatory:

ANSWER:

8(M) Do you, or anyone in your immediate family who may care for, or have contact with the child(ren) during your custody or visitation time, consume alcoholic beverages, narcotic drugs, or controlled substances? If so, state:

- (a) The type of beverage and/or drug;
- (b) The frequency of consumption; AND
- (c) The quantity of alcoholic beverages and/or drugs consumed per week.

9(M) Describe your plans for the child's educational development and how you intend to implement these plans.

ANSWER:

10(M) Give the following information regarding your present employment (please answer separately regarding each job held):

- a. Employer's name and address:
- b. Position or title:
- c. Date you were hired:
- d. Salary history for past two (2) years:
- e. Present work schedule including commute time to/from work:

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ANSWER:

11(M) State each and every material change in circumstances and/or conditions which you allege supports a modification of custody and/or visitation. Provide any and all facts and information including the dates, locations and witnesses for all incidents you allege support your allegation of a material change in circumstances since entry of the last order regarding custody and visitation.

ANSWER:

12(M) Please provide the following information concerning your child care arrangements for periods when you are absent from the minor child for either work or non-work related activities:

- a. Name/Address of provider:
- b. Age of provider (if younger than 18):
- c. Number of days used in past year:
- d. Where is the care provided?
- e. Your expected travel/absence schedule in next year:
- f. How long have you used this provider?
- g. Are any changes in the use of this daycare provider anticipated in the coming year?
If so, state all such changes:

ANSWER:

13(M) List all social networking and/or online community accounts (e.g. Facebook, Twitter, Instagram) that you or any minor child are currently a member of and/or have established anytime during the past two (2) years.

ANSWER:

14(M) Identify all persons you expect to call as a witness at trial or any hearing in this matter. For any expert witness, state the subject matter on which he or she is expected to testify, the substance of the facts and opinions to which he or she is expected to testify, and a summary of the grounds for each opinion.

ANSWER:

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AFFIDAVIT

STATE OF _____
City/COUNTY OF _____, to-wit:

I, _____, being first duly sworn, make oath and say that the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.

Signature

SWORN AND SUBSCRIBED before me, a Notary Public for the State and City/County aforesaid, this ___ day of _____, _____.

NOTARY PUBLIC

My Commission Expires: _____