

## ANNULMENT Grounds — In General.

## Definitions

The word "Annulment" as used herein shall mean a marriage which is either void (of no effect) at inception of marriage or voidable by one or both parties to marriage (marriage took effect but for defect; may set aside or continue).

1. Please state whether the defendant's age at the time of the defendant's marriage to the plaintiff was below the legal age of marriage in the jurisdiction where the marriage took place?
2. Please state the defendant's date of birth?
3. Please state the date of the marriage between the defendant and the plaintiff?
4. Please state the defendant's age at the time of the marriage between the defendant and the plaintiff?
5. Prior to or on the date of the marriage between the defendant and the plaintiff, did the defendant claim or allege that the defendant was of a particular age or that the defendant was older than the defendant actually was?
6. If your answer to the preceding interrogatory is in the affirmative, please state:
  - a. The date and place of each such claim or allegation,
  - b. The substance of what the defendant said about the defendant's age,
  - c. The identity of each person who heard the defendant make any such claim or allegation, and
  - d. Each reason or explanation why the defendant misstated the defendant's age.
7. Did the defendant know, at the time of the defendant's marriage to the plaintiff that the defendant was underage to marry the plaintiff?
8. Did the defendant act to conceal the defendant's real age from the plaintiff before or at the time of the marriage?
9. If your answer to the preceding interrogatory is in the affirmative, please state:
  - a. The date of each such act,
  - b. A description of each such act,
  - c. The reason or purpose for each such act, and
  - d. The extent to which the defendant was successful in concealing the defendant's real age.
10. Did the defendant act to conceal the defendant's real age from any local or state government authorities before or at the time of the defendant's marriage to the plaintiff?
11. If your answer to the preceding interrogatory is in the affirmative, please state:
  - a. The date of each such act,
  - b. A description of each such act,
  - c. The reason or purpose for each such act, and
  - d. The extent to which the defendant was successful in concealing the defendant's real age.

12. Did the defendant enter into a legal and binding marriage ceremony with the plaintiff at a time when the defendant was still legally married to another person?
13. Please state as of the time of each marriage entered into by the defendant:
  - a. The date and place,
  - b. The full name and last known address of each spouse, and
  - c. The place where each such marriage is recorded with local or state authorities.
14. Please state as to the defendant's first marriage:
  - a. The date and place,
  - b. The full name and last known address of the person who the defendant married at that time, and
  - c. The date and place of any divorce of such first marriage.
15. Please state as to the defendant's second marriage and each subsequent marriages:
  - a. The date and place,
  - b. The full name and last known address of each spouse, and
  - c. The date and place of any divorce.
16. Please state as to the defendant's marriage to the plaintiff:
  - a. The date and place,
  - b. The name of the person performing the marriage ceremony, and
  - c. The place where the marriage is recorded with local or state authorities.
17. Prior to the defendant's marriage to the plaintiff, did the defendant discuss with the plaintiff the fact that the defendant had been previously married?
18. If your answer to the preceding interrogatory is in the affirmative, please state:
  - a. The date and place of each discussion by the defendant with the plaintiff,
  - b. The substance of each discussion, indicating who said what to whom,
  - c. Whether the defendant told the plaintiff that the defendant had been married before but that the defendant was legally divorced and was now legally free to marry the plaintiff, or words to that effect, and
  - d. Whether the defendant ever denied that the defendant had been previously married.
19. Did the defendant act to prevent the plaintiff from learning about any previous marriage of the defendant?
20. If your answer to the preceding interrogatory is in the affirmative, please state:
  - a. The date and place of each such act,
  - b. Each conversation between the defendant and the plaintiff when the defendant wilfully concealed the fact of any defendant's previous marriage, and
  - c. A description of each act by the defendant to prevent the plaintiff from learning about any previous marriage of the defendant.

21. Did the defendant act to conceal any previous marriage by the defendant from any local or state authority, including the person in charge of the marriage ceremony, between the defendant and the plaintiff?
22. If your answer to the preceding interrogatory is in the affirmative, please state:
  - a. The date and place of such act of concealment,
  - b. A description of each act of concealment, and
  - c. Each person from whom the defendant intended to conceal the knowledge of his or her prior marriage.
23. During the past three years, have there been times when you had a condition of impotence, including your inability to achieve or maintain an erection?
24. If your answer to the preceding interrogatory is in the affirmative, please state as to each time of your impotence:
  - a. The date,
  - b. A description of your condition,
  - c. The impact of your condition on your sexual activities with the plaintiff, and
  - d. The cause of your condition.
25. If your condition of impotence was caused by or related to any medical problem which you had, please state:
  - a. A description of your medical problem,
  - b. How such problem was determined,
  - c. Identify any health care professional by name and address who saw or treated you for such condition,
  - d. The dates, kind and type of each medical treatment which you received for any such condition,
  - e. The success or lack of success of any medical treatment, and
  - f. Whether any such condition was caused by or related to your use of any alcoholic drink or any drug, and if so, give details.
26. If your condition of impotence was caused by or related to any mental or psychological problem which you had, please state:
  - a. A description of your mental or psychological problem,
  - b. How such problem was determined,
  - c. Identify any health care professional by name and address who saw or treated you for such condition,
  - d. The date, kind and type of each treatment which you received for any such condition,
  - e. The success or lack of success of any medical treatment, and
  - f. Whether any such condition was caused by or related to your use of any alcoholic drink or any drug, and if so, give details.
27. At any time within the past three years, did the defendant refuse to see any medical professional about the defendant's problem of impotence?

28. At any time within the past three years, did the defendant refuse any medical treatment for the defendant's problem of impotence?
29. Within the past three years, did the defendant refuse to see a medical professional after being requested to do so by the plaintiff?
30. Please state whether or not the defendant knew of the defendant's impotence problem before the defendant's marriage to the plaintiff?
31. Please state whether the defendant informed the plaintiff before the marriage of the defendant's impotence problem?
32. Please state in detail the effects of the impotence condition on the marriage between the defendant and the plaintiff?
33. Prior to the defendant's marriage to the plaintiff, did the defendant ever conceal from the plaintiff the fact that the defendant had been previously married?
34. If, prior to the defendant's marriage to the plaintiff, the defendant had been previously married, please state as to each such prior marriage:
- Each date and place,
  - The full name and last known address of each previous spouse, and
  - The legal status, including whether each such prior marriage had been legally terminated by the time of the defendant's marriage to the plaintiff.
35. If, prior to the defendant's marriage to the plaintiff, there had been discussions between the defendant and the plaintiff about any prior marriage by the defendant, please state as to each such discussion:
- Each date and place,
  - The names and last known addresses of each person present,
  - The substance of the discussion, indicating who said what to whom, and
  - Whether the defendant denied any previous marriage.
36. Did the defendant, by any act, denial, talk, or conduct, ever conceal, whether intentionally or other side, the fact that prior to the defendant's marriage to the plaintiff, the defendant had been previously married.
37. If your answer to the preceding interrogatory is in the affirmative, please state as to any such concealment:
- Each date and place,
  - A description of each such concealment,
  - How and in what manner such concealment took place, and
  - The name of the person or entity from whom such prior marriage was concealed, including the plaintiff, the plaintiff's family, the public official who presided at the plaintiff's marriage ceremony, and the local or state authorities.
38. Was the defendant pregnant at the time of the marriage between the defendant and the plaintiff?
39. If your answer to the preceding interrogatory is in the affirmative, please state:
- The date of the marriage between the defendant and the plaintiff,

- b. The date of conception of the fetus carried by the defendant at the time of the marriage,
  - c. The number of weeks that the defendant had been pregnant at the time of the defendant's marriage to the plaintiff,
  - d. The name of each biological parent of the defendant's pregnancy, and
  - e. Whether either or both the biological parents of the defendant's pregnancy knew of the pregnancy at the time of the marriage.
40. Prior to the marriage of the defendant to the plaintiff, did any discussion or conversation take place between the defendant and the plaintiff about the defendant's existing pregnancy?
41. If your answer to the preceding interrogatory is in the affirmative, please state as to any such discussion or conversation between the defendant and the plaintiff:
- a. The date and place,
  - b. The substance of each discussion or conversation, indicating who said what to whom about the defendant's existing pregnancy, and
  - c. Whether or not the defendant denied any existing pregnancy.
42. If the defendant was pregnant at the time of the marriage between the defendant and the plaintiff, please state:
- a. The date when the defendant first became suspicious or believed that the defendant was pregnant,
  - b. The date when the defendant knew or learned that the defendant was pregnant,
  - c. The date when the plaintiff first heard that the defendant might be or was pregnant,
  - d. The method or means by which the plaintiff first learned that the defendant might be or was pregnant,
  - e. The full substance of the disclosure that the defendant made to the plaintiff about the defendant's pregnancy, and
  - f. A description of any act or conduct by the defendant to conceal the defendant's pregnancy from the plaintiff.
43. Was the plaintiff under any duress, coercion or compulsion by the defendant to marry the defendant?
44. If your answer to the preceding interrogatory is in the affirmative, please state as to any such duress, coercion or compulsion:
- a. Each date and time period,
  - b. The nature and extent of each,
  - c. A description of each,
  - d. The severity of each felt by the plaintiff as shown by the plaintiff's conduct,
  - e. Each motive and reason of each,
  - f. Whether and to what extent the plaintiff was or was not able to resist or overcome each, and

- g. The name and address of each person, other than the defendant and the plaintiff, who was aware of any duress, coercion or compulsion on the part of the defendant or the effect of such duress, coercion or compulsion on the part of the plaintiff.
45. At any time, did the defendant commit or perpetrate any fraud on the plaintiff?
46. If your answer to the preceding interrogatory is in the affirmative, please state as to any such fraud:
- a. Each date, time period and place,
  - b. A description of the nature and extent of any such fraud,
  - c. Each motive or reason by the defendant for committing or perpetrating any such fraud,
  - d. The conduct of the defendant in perpetrating any such fraud,
  - e. How and to what extent the plaintiff expressed disbelief of the defendant's statements, and
  - f. The names and addresses of all witnesses who have any knowledge about any such fraud.
47. Prior to the defendant's marriage to the plaintiff, did the defendant in any way conceal, hide from or withhold information from the plaintiff relating to any medical or mental health condition, problem, injury, illness or disease of the defendant?
48. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. Each date of any such concealment, hiding or withholding of information,
  - b. A description in detail of any such concealment, hiding or withholding of information,
  - c. A description of each medical or mental health condition, problem, injury, illness and disease involved,
  - d. The identity, including name and address, of each health care professional examining or treating the defendant,
  - e. Each date of each examination and treatment by each health care professional,
  - f. A detailed prognosis and expected future outcome of each medical or mental health condition, problem, injury, illness and disease, giving the name of the health care professional making each such prognosis, and
  - g. A description of all treatments prescribed for and undergone by the defendant for each such medical or mental health condition, problem, injury, illness and disease, including the success or failure of each such treatment.
49. Please state whether the plaintiff ever requested the defendant to see any health care professional or to undergo any treatment for any such medical or mental health condition, problem, injury, illness or disease?
50. If your answer to the preceding interrogatory is in the affirmative, please state whether the defendant refused to see any such health care professional or to undergo treatment?
51. Prior to the defendant's marriage to the plaintiff, did the defendant have any knowledge of or was aware that the defendant had or suffered from any medical or mental health condition, problem, injury, illness or disease?

52. If your answer to the preceding interrogatory is in the affirmative, please state whether the defendant informed the plaintiff of any such condition, problem, injury, illness or disease before the marriage?
53. If, prior to the defendant's marriage to the plaintiff, the defendant had any medical or mental health condition, problem, injury, illness or disease, please state:
- A description of the effect that any such condition, problem, injury, illness or disease had on the marriage, and
  - A description of the effect that any such condition, problem, injury, illness or disease had on the defendant's ability to function and earn a living.
54. During the past three years, did you, by any act or conduct, refuse or deny any request or expectation by the plaintiff for sexual intercourse?
55. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
- Each date of any refusal or denial,
  - Each method or means used by you to refuse or deny sexual intercourse to the plaintiff, and
  - Each reason, cause or explanation of any refusal or denial.
56. Please state the most recent date when you had sexual intercourse with the plaintiff?
57. Please state the circumstances of your most recent sexual intercourse with the plaintiff?
58. Please state the most recent date when you were approached or contacted by the plaintiff with a request for sexual intercourse?
59. During the past three years, have there been any conversations or discussions between the defendant and the plaintiff on the subject matter of the refusal of conjugal or intimate sexual relations?
60. If your answer to the preceding interrogatory is in the affirmative, please state as to each conversation and discussion:
- Each date,
  - The substance of each conversation and discussion indicating who said what to whom on that subject matter,
  - Whether the defendant ever expressed prior to the marriage any reason for refusing conjugal relations, and
  - Whether the defendant believed that the plaintiff understood before the marriage the defendant's refusal of conjugal relations.
61. Please state in detail the effect of the defendant's refusal of conjugal relations on the marriage of the defendant and the plaintiff.
62. Prior to the defendant's marriage to the plaintiff, did the defendant have or was the defendant afflicted with any medical or mental health condition, problem, illness or disease known as a Multiple Personality Disorder?
63. If your answer to the preceding interrogatory is in the affirmative, please state:
- The first date of any diagnosis of any such disorder,
  - A description in detail of any such disorder,

- c. A description of the signs and symptoms of any such disorder,
  - d. The identity, including name and address, of each health care professional examining or treating the defendant for any such disorder,
  - e. Each date of each examination and treatment by each health care professional for such disorder,
  - f. A detailed prognosis and expected future outcome of such disorder, giving the name of the health care professional making each such prognosis, and
  - g. A description of all treatments prescribed for and undergone by the defendant for each such disorder, including the success or failure of each such treatment.
64. Please state whether the plaintiff ever requested the defendant to see any health care professional or to undergo any treatment for any such disorder.
65. If your answer to the preceding interrogatory is in the affirmative, please state whether the defendant refused to see any such health care professional or to undergo treatment?
66. Prior to the defendant's marriage to the plaintiff, did the defendant have any knowledge of or was aware that the defendant had or suffered from Multiple Personality Disorder?
67. If your answer to the preceding interrogatory is in the affirmative, please state whether the defendant informed the plaintiff of any such disorder.
68. If, prior to the defendant's marriage to the plaintiff, the defendant had any multiple personality disorder, please state:
- a. A description of the effect of any such disorder, and
  - b. A description of the effect that any such disorder had on the defendant's ability to function and earn a living.

#### Impotence.

1. During the past three years, have there been times when the defendant has had a condition of impotence, including an inability to achieve or maintain an erection?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to each time of the defendant's impotence:
  - a. The date of each,
  - b. The date when the impotence first occurred,
  - c. A description of the condition,
  - d. The duration of the impotence,
  - e. The frequency of the impotence, indicating whether it was constant or episodic,
  - f. The impact of the condition on your sexual activities with the plaintiff, and
  - g. The cause of the condition.
3. If your condition of impotence was caused by or related to any medical problem which you had, please state:
  - a. A description of your medical problem,
  - b. How such problem was determined,



- c. Identify any health care professional by name and address who saw or treated you for such condition,
  - d. The dates, kind and type of each medical treatment which you received for any such condition,
  - e. The success or lack of success of any medical treatment, and
  - f. Whether any such condition was caused by or related to your use of any alcoholic drink or any drug, and if so, give details.
4. If your condition of impotence was caused by or related to any mental or psychological problem which you had, please state:
  - a. A description of your mental or psychological problem,
  - b. How such problem was determined,
  - c. Identify any health care professional by name and address who saw or treated you for such condition,
  - d. The date, kind and the of each treatment which you received for any such condition,
  - e. The success of lack of success of any medical treatment, and
  - f. Whether any such condition was caused by or related to your use of any alcoholic drink or any drug, and if so, give details.
5. If the defendant has received or undergone any examination or treatment for the defendant's condition of impotence, please state:
  - a. The identity, giving name and address, of each health care professional seen by the defendant for any examination or treatment,
  - b. Each date of examination and treatment, indicating the name of each health care professional involved on each,
  - c. A description of each diagnosis made, identifying the signs and symptoms noted,
  - d. A description of the choices and options for treatment suggested by each health care professional, identifying which professional suggest which treatment option,
  - e. A description of each kind and type of treatment undergone by the defendant,
  - f. An evaluation of the success or failure of any such treatment, and
  - g. The prognosis or estimated future outcome of any such treatment.
6. At any time within the past three years, did the defendant refuse to see any medical professional about the defendant's condition of impotence?
7. At any time within the past three years, did the defendant refuse any medical treatment for the defendant's condition of impotence?
8. Within the past three years, did the defendant refuse to see any medical professional after being requested to do so by the plaintiff?
9. Please state whether or not the defendant knew of the defendant's impotence problem before the defendant's marriage to the plaintiff?
10. If your answer to the preceding interrogatory is in the affirmative, please state:
  - a. The date when the defendant first knew of the defendant's impotence,
  - b. The date when the defendant first sought medical care or assistance, and

- c. Whether the defendant knew before the marriage that the plaintiff wanted to have children.
11. After the defendant first learned of the defendant's impotence, did the defendant tell any other person of the defendant's impotence?
12. If your answer to the preceding interrogatory is in the affirmative, please state:
- The date when the defendant first told anyone,
  - The name and address of the first person told,
  - The name of each person who was told and the date of each telling,
  - Whether the defendant told the plaintiff before the date of the defendant's marriage to the plaintiff, and
  - If the defendant told the plaintiff before the marriage, give the substance of the conversation, including who said what to whom.
13. Did the plaintiff at any time ask the defendant to undergo treatment for the defendant to undergo treatment for the defendant's condition of impotence?
14. If your answer to the preceding interrogatory is in the affirmative, please state:
- The date of each request,
  - The defendant's response to each request, and
  - Whether the defendant received treatment after the plaintiff's request.
15. Has the defendant's condition of impotence had any effect on the defendant's marriage to the plaintiff?
16. If your answer to the preceding interrogatory is in the affirmative, please state as to any such effect:
- A description of each effect,
  - The date of each effect,
  - How, wherein and in what manner the marriage has been affected,
  - Whether and to what extent the plaintiff is or has been supportive of the defendant during the defendant's impotence,
  - Whether and to what extent sexual intercourse and other sexually intimate relations are possible, indicating the frequency and duration of time periods without sexual relations,
  - Whether and to what extent has the defendant had sexual relations with others during the defendant's impotence, and
  - Whether and to what extent has the defendant's condition of impotence caused other marital problems such as arguing, blaming or criticizing.
17. Prior to their marriage did the defendant and the plaintiff have any discussions or conversations about the subject of having children together?
18. If your answer to the preceding interrogatory is in the affirmative, please state as to any such discussions or conversations:
- The date and place of each,
  - The substance thereof including who said what to whom, and

- c. Whether, as a result of any such discussion or conversation, the defendant knew, prior to the marriage, that the plaintiff wanted to have children?

Concealment of Previous Marriage.

1. Prior to the defendant's marriage to the plaintiff, did the defendant ever conceal from the plaintiff the fact that the defendant had been previously married?
2. If, prior to the defendant's marriage to the plaintiff, the defendant had been previously married, please state as to each such prior marriage:
  - a. Each date and place,
  - b. The full name and last known address of each previous spouse, and
  - c. The legal status, including whether each such prior marriage had been legally terminated by the time of the defendant's marriage to the plaintiff.
3. If, prior to the defendant's marriage to the plaintiff, there had been discussions between the defendant and the plaintiff about any prior marriage by the defendant, please state as to each such discussion:
  - a. Each date and place,
  - b. The names and last known addresses of each person present,
  - c. The substance of the discussion, indicating who said what to whom, and
  - d. Whether the defendant denied any previous marriage.
4. Did the defendant, by any act, denial, talk or conduct, ever conceal, whether intentionally or otherwise, the fact that prior to the defendant's marriage to the plaintiff, the defendant had been previously married?
5. If your answer to the preceding interrogatory is in the affirmative, please state as to any such concealment:
  - a. Each date and place,
  - b. A description of each such concealment,
  - c. How and in what manner such concealment took place,
  - d. The name of the person or entity from whom such prior marriage was concealed, including the plaintiff, the plaintiff's family, the public official who presided at the plaintiff's marriage ceremony, and the local or state authorities, and
  - e. Did any act or conduct on the part of the defendant include the use of any false name or any alias or the use of any false social security number, and if so, give details.