

Pregnancy at Time of Marriage.

1. Was the defendant pregnant at the time of the marriage between the defendant and the plaintiff?
2. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. 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.
3. 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?
4. 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.
5. 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.
6. After the marriage by the defendant with the plaintiff, did the defendant state or confess that the defendant had known of the pregnancy prior to the marriage?
7. If your answer to the preceding interrogatory is in the affirmative, please state as to any statement or confession:
 - a. Each date and place,
 - b. The substance of each, indicating who said what to whom, and

- c. The motive or explanation offered by the defendant for the failure by the defendant for not telling the plaintiff that prior to the marriage the defendant was pregnant.

Duress.

1. Was the plaintiff under any duress, coercion or compulsion by the defendant to marry the defendant?
2. 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,
 - 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,
 - h. If physical abuse was involved, give details,
 - i. If emotional abuse was involved, give details,
 - j. If isolation of the plaintiff from the plaintiff's family and friends was involved, give details,
 - k. If marriage to avoid the defendant revealing information was involved, give details, and
 - l. If the defendant's threatening suicide if the plaintiff would not marry the defendant was involved, give details.
3. Please state as to any duress the defendant applied to the plaintiff:
 - a. Each defendant motive,
 - b. Each defendant reason,
 - c. If social position was a motive or reason for the defendant's duress, give details, and
 - d. If custody of children was a motive or reason for the defendant's duress, give details.
4. Please state whether the plaintiff resisted any duress on the part of the defendant?
5. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. Each date of resistance,
 - b. A description of how and in what manner the plaintiff resisted, and
 - c. The form of any resistance.

6. Did the plaintiff, to the knowledge of the defendant, ever tell anyone about the defendant's duress inflicted on the plaintiff?
7. If you answer to the preceding interrogatory is in the affirmative, please state:
 - a. The identity, including name and address, of each person that the plaintiff told about the defendant's duress,
 - b. The substance of what was said, and
 - c. The plaintiff's circumstances at the time of the telling.

Fraud.

1. At any time, did the defendant commit or perpetrate any fraud on the plaintiff?
2. 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.
3. If the defendant committed or perpetrated any financial fraud on the plaintiff, please state as to such fraud:
 - a. The nature and extent of the fraud, and
 - b. A description of any such fraud.
4. If the defendant misrepresented the net worth of the defendant as part of any financial fraud committed or perpetrated on the plaintiff, please state:
 - a. The date of each such fraudulent act,
 - b. The nature and extent of the fraud,
 - c. A description of each such fraudulent act,
 - d. The name and address of each witness who has any knowledge of any such fraud, and
 - e. Each motive or reason by the defendant for any such fraud.
5. If the defendant misrepresented the annual income of the defendant as part of any financial fraud committed or perpetrated on the plaintiff, please state:
 - a. The date of each such fraudulent act,
 - b. The nature and extent of the fraud,
 - c. A description of each such fraudulent act,

- d. The name and address of each witness who has any knowledge of any such fraud, and
 - e. Each motive or reason by the defendant for any such fraud.
6. If the defendant misrepresented the indebtedness of the defendant as part of any financial fraud committed or perpetrated on the plaintiff, please state:
- a. The date of each such fraudulent act,
 - b. The nature and extent of the fraud,
 - c. A description of each such fraudulent act,
 - d. The name and address of each witness who has any knowledge of any such fraud, and
 - e. Each motive or reason by the defendant for any such fraud.
7. If the defendant misrepresented any business associations of the defendant as part of any financial fraud committed or perpetrated on the plaintiff, please state:
- a. The date of each such fraudulent act,
 - b. The nature and extent of the fraud,
 - c. A description of each such fraudulent act,
 - d. The name and address of each witness who has any knowledge of any such fraud, and
 - e. Each motive or reason by the defendant for any such fraud.
8. If the defendant misrepresented the employment and education of the defendant as part of any financial fraud committed or perpetrated on the plaintiff, please state:
- a. The date of each such fraudulent act,
 - b. The nature and extent of the fraud,
 - c. A description of each such fraudulent act,
 - d. The name and address of each witness who has any knowledge of any such fraud, and
 - e. Each motive or reason by the defendant for any such fraud.
9. If the defendant misrepresented the personal or family history of the defendant as part of any financial fraud committed or perpetrated on the plaintiff, please state:
- a. The date of each such fraudulent act,
 - b. The nature and extent of the fraud,
 - c. A description of each such fraudulent act,
 - d. The name and address of each witness who has any knowledge of any such fraud, and
 - e. Each motive or reason by the defendant for any such fraud.
10. If the defendant misrepresented the criminal record of the defendant as part of any financial fraud committed or perpetrated on the plaintiff, please state:
- a. The date of each such fraudulent act,
 - b. The nature and extent of the fraud,

- c. A description of each such fraudulent act,
 - d. The name and address of each witness who has any knowledge of any such fraud, and
 - e. Each motive or reason by the defendant for any such fraud.
11. If the defendant's motive or purpose for committing fraud on the plaintiff was to conceal the defendant's unemployment, please state:
 - a. A description of each act or conduct relating to fraud,
 - b. The date of each act or conduct,
 - c. The effect of each such act on the plaintiff, and
 - d. The benefit derived by the defendant for each such act or conduct.
12. If the defendant's motive or purpose for committing fraud on the plaintiff was to conceal the defendant's criminal record, please state:
 - a. A description of each act or conduct relating to fraud,
 - b. The date of each act or conduct,
 - c. The effect of each such act on the plaintiff, and
 - d. The benefit derived by the defendant for each such act or conduct.
13. If the defendant's motive or purpose for committing fraud on the plaintiff was to conceal the defendant's indebtedness, please state:
 - a. A description of each act or conduct relating to fraud,
 - b. The date of each act or conduct,
 - c. The effect of each such act on the plaintiff, and
 - d. The benefit derived by the defendant for each such act or conduct.
14. If the defendant's motive or purpose for committing fraud on the plaintiff was to conceal the defendant's insolvency, please state:
 - a. A description of each act or conduct relating to fraud,
 - b. The date of each act or conduct,
 - c. The effect of each such act on the plaintiff, and
 - d. The benefit derived by the defendant for each such act or conduct.
15. Please describe each act or conduct on the part of the defendant when the defendant attempted to commit fraud on the plaintiff, including:
 - a. The nature of any act or lie such as the use of a false name or a false social security number,
 - b. The date and time period of each statement or act of fraud, and
 - c. Whether the defendant told others of the fraud, and if so, what was told to whom.
16. If the plaintiff reacted to the defendant's fraud, please state whether the plaintiff expressed disbelief of the fraudulent conduct of the defendant?

17. Please state how and in what manner the plaintiff learned of the defendant's fraud against the plaintiff, including:
 - a. The method and manner of the plaintiff's learning of the fraud,
 - b. Whether the defendant confessed the fraud,
 - c. Whether a third person told the plaintiff and, if so, the identity of each such person, and
 - d. Whether the defendant was arrested.
18. Please state whether the plaintiff told others of the defendant's fraud against the plaintiff?
19. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The name and address of each person told,
 - b. A description of what was told,
 - c. The circumstances and conditions of the plaintiff at the time of each telling, and
 - d. The nature and extent of the plaintiff's reaction to the defendant's fraud.

Concealment of Health Problems.

1. 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?
2. 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.
3. 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?
4. 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?
5. 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?

6. 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?
7. 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. A description of the effect that any such condition, problem, injury, illness or disease had on the marriage, and
 - b. 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.
8. Prior to the defendant's marriage to the plaintiff, did the defendant have or suffer from any medical or mental health condition, problem, injury, illness or disease, including but without limitation, the following:
 - a. Fatal disease,
 - b. Debilitating disease,
 - c. Contagious disease, such as AIDS or other sexually transmitted disease,
 - d. Psychological difficulty, such as suicidal tendencies, depression, schizophrenia, manic depression, phobia or other,
 - e. Drug or alcohol addiction,
 - f. Eating disorder, and
 - g. Other health problem.
9. If your answer to any part of the preceding interrogatory is in the affirmative, please state as to each such medical or mental health condition, problem, injury, illness or disease:
 - a. A description of each, including signs and symptoms,
 - b. The inclusive dates of the diagnosis and treatment of each,
 - c. The identity, including name and address, of each health care professional involved in the diagnosis, treatment or prognosis of each,
 - d. The nature and extent of the diagnosis and treatment of each,
 - e. The prognosis of each,
 - f. The success or lack of success of the treatment of each,
 - g. The identity of each where the defendant refused to undergo treatment,
 - h. When and in what manner the plaintiff first learned of each,
 - i. The manner and method used by the defendant to tell the plaintiff about each, and
 - j. The date when the plaintiff first learned of each.

Refusal of Conjugal Relationship.

1. 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?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to each such act or conduct:
 - a. Each date of any refusal or denial,

- b. Each method or means used by you to refuse or deny sexual intercourse to the plaintiff, and
 - c. Each reason, cause or explanation of any refusal or denial.
3. Please state the most recent date when you had sexual intercourse with the plaintiff?
4. Please state the circumstances of your most recent sexual intercourse with the plaintiff?
5. Please state the most recent date when you were approached or contacted by the plaintiff with a request for sexual intercourse.
6. If, during the past three years, you ever refused any of plaintiff's requests for sexual intimacy or sexual intercourse, was impotency a reason for your refusal?
7. If your answer to the preceding interrogatory is in the affirmative, please state as to any such impotency:
 - a. Each date,
 - b. Each medical or other treatment, if any, received by you,
 - c. The identification, including name and address, of each health care professional seen by you or who treated you,
 - d. Each drug, alcohol, or medication which may have caused your impotency,
 - e. A description of your impotency, and
 - f. The effect of your impotency on your sexual behavior.
8. If, during the past three years, you ever refused any of plaintiff's requests for sexual intimacy or sexual intercourse, was physical or mental illness a reason for your refusal?
9. If your answer to the preceding interrogatory is in the affirmative, please state as to any such illness:
 - a. Each date,
 - b. Each medical or other treatment,
 - c. The identification, including name and address, of each health care professional seen by you or who treated you,
 - d. A description of each such illness, and
 - e. The effect of your illness on your sexual behavior.
10. If, during the past three years, you ever refused any of plaintiff's requests for sexual intimacy or sexual intercourse, was any act, conduct or behavior by the plaintiff a reason for your refusal?
11. If your answer to the preceding interrogatory is in the affirmative, please state as to any act, conduct or behavior:
 - a. Each date,
 - b. A description of each such act, conduct or behavior, indicting who said and did what to whom, and
 - c. The effect of each such act, conduct or behavior on your sexual behavior.
12. If, during the past three years, you ever refused any of plaintiff's requests for sexual intimacy or sexual intercourse, please state each reason for your refusal, explaining the date, time, place, actions of the plaintiff and your actions.

13. Within the past three years, has there been any effort made by the plaintiff to attempt to resolve any problem relating the conjugal or marriage relationship between the defendant and the plaintiff?
14. If your answer to the preceding interrogatory is in the affirmative, please state as to any such effort:
 - a. Each date involved,
 - b. A description of each problem,
 - c. A description of each attempted effort,
 - d. A description of the success or failure of each attempted effort, and
 - e. Each reason why any such effort was not effective.
15. Within the past three years, has there been any effort made by the defendant to attempt to resolve any problem relating to the conjugal or marriage relationship between the defendant and the plaintiff?
16. If your answer to the preceding interrogatory is in the affirmative, please state as to any such effort:
 - a. Each date involved,
 - b. A description of each problem,
 - c. A description of each attempted effort,
 - d. A description of the success or failure of each attempted effort, and
 - e. Each reason why any such effort was not effective.
17. Within the past three years, has there been any effort by either the plaintiff or defendant to seek counseling for any problem related to the conjugal or marriage relationship between the plaintiff and the defendant?
18. If your answer to the preceding interrogatory is in the affirmative, please state as to any such effort:
 - a. A description of any effort by the plaintiff,
 - b. A description of any effort by the defendant,
 - c. Each date involved,
 - d. A description of each problem,
 - e. The name and address of each counselor involved,
 - f. The result of each such effort,
 - g. The identity of the person who stopped any such effort, and
 - h. Each reason for stopping any such effort.
19. 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?
20. If your answer to the preceding interrogatory is in the affirmative, please state as to each conversation and discussion:
 - a. Each date,
 - b. The substance of each conversation and discussion indicating who said what to whom on that subject matter,

- c. Whether the defendant ever expressed prior to the marriage any reason for refusing conjugal relations, and
- d. Whether the defendant believed that the plaintiff understood before the marriage the defendant's refusal of conjugal relations.
21. Please state in detail the effect of the defendant's refusal of conjugal relations on the marriage of the defendant and the plaintiff.
22. Prior to the defendant's marriage to the plaintiff, did the defendant and the plaintiff have any conversation or discussion about the nature and extent of any sexual intimacy or sexual intercourse to be engaged in after the marriage?
23. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The date of each such conversation and discussion,
- b. The substance of each such conversation and discussion, indicating who said what to whom,
- c. Whether the defendant ever informed the plaintiff by any words that, after the marriage, the defendant would refuse to have sexual relations with the plaintiff, and if so, give details.
24. Prior to the defendant's marriage to the plaintiff, did the defendant and the plaintiff have any conversation or discussion related in any way to the expectation that the defendant would refuse conjugal relations after the marriage?
25. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. Each date,
- b. The substance, indicating who said what to whom,
- c. Whether the plaintiff was upset or unhappy with the defendant's refusal of conjugal relations, and if so, give details,
- d. Whether the defendant expressed any reason for the refusal, and if so, give details, and
- e. Whether the defendant believed that the plaintiff understood the defendant's reason for the refusal of conjugal relations, and if so, give details.
26. Prior to the defendant's marriage to the plaintiff, did the defendant and the plaintiff have any conversation relating in any way to their having children together?
27. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. Each date,
- b. The substance, indicating who said what to whom,
- c. Whether the defendant stated that the defendant wanted children, and if so, give details, and
- d. Whether the plaintiff stated that the plaintiff wanted children, and if so, give details.