

Interference with Business Relationships.

Definitions

The term "alleged occurrence" as used in these interrogatories shall mean the conduct and actions of the defendant which affected or interfered with the alleged contractual relationship between the plaintiff and the third-party contractor, as alleged in the plaintiff's complaint.

1. Please identify yourself, giving your full name, residence, business address, and occupation.
2. Please identify your relationship to the _____ business, including:
 - a. Dates of involvement in the business,
 - b. Description of your involvement in each business,
 - c. Titles held, and
 - d. Description of each business activity in which involved.
3. Please describe all dealings or communications that you had with the plaintiff regarding the business in the three year period immediately prior to the alleged occurrence, including:
 - a. The dates of all such dealings or communications,
 - b. The subject matter of all such dealings or communications,
 - c. The terms of all such dealings or communications, and
 - d. The consequences of all such dealings or communications.
4. Please describe your alleged relationship to the plaintiff's business, including:
 - a. Officer,
 - b. Director,
 - c. Advisor,
 - d. Employee,
 - e. Financier, and
 - f. Other.
5. Do you assert that you had a business or fiduciary relation with the plaintiff in relation to the activities of the _____ business at the time of the alleged occurrence(s)?
6. If your answer to the previous interrogatory is affirmative, please state the following:
 - a. The basis for such a relationship,
 - b. The extent of such a relationship and all associated activities,
 - c. Any documents that reflect such a relationship,
 - d. The characteristics of the relationship,
 - e. The activities of the relationship, and
 - f. The dates such a relationship existed.

7. Please state as to each and every witness, including parties, known to have seen, heard, or known about any such business or fiduciary relationship, including:
 - a. The name and address of each witness,
 - b. The place where each witness was at the time the witness saw, heard, or learned about the alleged interference,
 - c. The substance of all information or knowledge about the alleged interference known to each witness,
 - d. Whether any such witness gave any statement or account, either oral or in writing, of the witness' knowledge of the alleged interference, and if so, the substance of each such statement or account,
 - e. Your relationship to each such witness, and
 - f. The witness' relationship to the business.
8. Please state as to each act of alleged business interference, your role including:
 - a. Extent of knowledge regarding each such incident,
 - b. Source of knowledge for each incident,
 - c. Dates first aware of each such incident,
 - d. Description of role in each such incident, and
 - e. Reason for involvement in each incident.
9. Please state as to each and every witness, including parties, known to have seen, heard, or known about any alleged act of interference:
 - a. The name and address of each witness,
 - b. The place where each witness was at the time the witness saw, heard, or learned about the alleged interference,
 - c. The substance of all information or knowledge about the alleged interference known to each witness,
 - d. Whether any such witness gave any statement or account, either oral or in writing, of the witness' knowledge of the alleged interference, and if so, the substance of each such statement or account, and
 - e. Your relationship to each such witness.
10. If you claim that any other person(s) caused or contributed to the alleged interference with business relationships, please state the following:
 - a. The name and address of such person(s),
 - b. The occupation of each person,
 - c. The nature and extent of each act of interference,
 - d. The dates of each act,
 - e. The effect of each act,
 - f. The reason for taking each act,
 - g. The third party's knowledge of each spouse's role in the business, and
 - h. Each witness to any such act.

11. Please state as to each and every witness that observed such interference by a third party, known to have seen, heard, or known about any alleged act of interference:
 - a. The name and address of each witness,
 - b. The place where each witness was at the time the witness saw, heard, or learned about the alleged interference,
 - c. The substance of all information or knowledge about the alleged interference known to each witness,
 - d. Whether any such witness gave any statement or account, either oral or in writing, of the witness' knowledge of the alleged interference, and if so, the substance of each such statement or account, and
 - e. Your relationship to each such witness.
12. Please state whether any third parties that are alleged to have interfered had any special relationship to you, including:
 - a. Personal relationship,
 - b. Relative,
 - c. Business associates,
 - d. Acquaintance,
 - e. Other form of relationship,
 - f. Dates the relationship commenced,
 - g. Circumstances under which relationship commenced,
 - h. Dates the relationship ended, and
 - i. Reason the relationship ended.
13. For each act of interference complained of by plaintiff, please state the business reason for each such act, including:
 - a. Description of each action,
 - b. Reason for choosing each action,
 - c. Intended effect of action,
 - d. Actual effect of action, and
 - e. Basis or reason for action.
14. If the actions described in the preceding interrogatory are documents in any form, including written, typed, printed, recorded, taped, or other medium, please state:
 - a. The current location of each,
 - b. The actions each reflects, and
 - c. The date and location where each occurred.

Palimony.

1. Please state the approximate date when you first met the plaintiff?
2. Please state the approximate date when you became well enough acquainted with the plaintiff so that you saw him or her more frequently than once a week?

3. Please state the approximate date when you and the plaintiff first had sexual intimacy or sexual relations?
4. Please state the approximate inclusive dates of your sexual relationship with the plaintiff, giving the approximate first date of your sexual relationship and giving the approximate most recent date of your sexual relationship?
5. Please state the approximate first date of your cohabitation or living together and giving the approximate most recent date of your cohabitation or living with the plaintiff?
6. Please state in detail the nature and extent of your relationship with the plaintiff, including:
 - a. A description of your social relationship as you intended it to appear to others, including whether as good friends, engaged to be married, or any other characterization,
 - b. A description of each aspect of any legal relationship which you had with the plaintiff, including whether you entered into any formal ceremony, whether you entered into any contractual or legal arrangement or whether there were any legal aspects to your relationship,
 - c. Please state the nature and extent of each statement or assertion of love or affection which you made to the plaintiff,
 - d. A description of any plans or expectations that you and the plaintiff would be married,
 - e. A description of all financial arrangements between you and the plaintiff, including how and in what manner you would share costs and expenses, make purchases and combine or segregate income, and
 - f. Whether and to what extent your relationship with the plaintiff was one of convenience for both of you.
7. During the course of your relationship with the plaintiff, did you make any promise or agreement to the plaintiff?
8. If your answer to the preceding interrogatory is in the affirmative, please state as to each such promise or agreement:
 - a. The date,
 - b. A complete description of each such promise or agreement,
 - c. The circumstances and conditions between you and the plaintiff at the time of your making each such promise or agreement,
 - d. If any such promise or agreement was entirely oral, please state the substance of the complete conversation you had with the plaintiff, including who said what about each subject matter discussed,
 - e. If any part of any such promise or agreement was in writing, please give verbatim the words and language of any such writing,
 - f. If any part of any such promise or agreement was in writing, please attach a copy of any such writing or indicate where and when the original of any such writing may be examined by counsel, and
 - g. A description of any performance of any such promise or agreement, indicating to what extent you complied with your commitment as to any such promise or agreement.

9. During the course of your relationship with the plaintiff, did you make any promise or agreement to share income?
10. If your answer to the preceding interrogatory is in the affirmative, please state in detail:
- Any requirement or obligation on the plaintiff's part,
 - Each reason or purpose of any such promise or agreement,
 - The circumstances and conditions present when any such promise or agreement was made,
 - The dollar amount of any income actually received by the plaintiff or made available by you for the benefit of the plaintiff,
 - The approximate date and place of the making of any such promise or agreement,
 - Whether any such promise or agreement was oral or in writing, or both, and
 - The substance and language of any such promise or agreement.
11. During the course of your relationship with the plaintiff, did you make any promise or agreement relating in any way to or to provide for any breakup or termination of your relationship with the plaintiff?
12. If your answer to the preceding interrogatory is in the affirmative, please state in detail as to any such promise or agreement:
- The substance and language of any such promise or agreement,
 - Whether any such promise or agreement was oral or in writing, or both, and
 - The approximate date and place of the making of any such promise or agreement.
13. During the course of your relationship with the plaintiff, did you make any promise or agreement of a financial nature relating in any way to the plaintiff's being a beneficiary in your will?
14. If your answer to the preceding interrogatory is in the affirmative, please state in detail as to any such promise or agreement:
- The approximate date and place of the making of any such promise or agreement,
 - If any such promise or agreement was oral, give the substance of who said what to whom on each subject matter,
 - If any such promise or agreement was entirely or partly in writing, please give the verbatim terms and language,
 - Any requirement or obligation on the part of the plaintiff,
 - Each reason or purpose of any such promise or agreement,
 - The circumstances and conditions present when any such promise or agreement was made,
 - The kind and type of any financial or other support or benefit promised or agreed to by you for the benefit of the plaintiff, and
 - Your performance in living up to or carrying out your commitment to any such promise or agreement, giving the dates and your conduct.
15. During the course of your relationship with the plaintiff, did you make any promise or agreement of a financial nature relating in any way to your designating the plaintiff as a beneficiary of any life or other insurance?

16. If your answer to the preceding interrogatory is in the affirmative, please state in detail as to any such promise or agreement:
- The approximate date and place of the making of any such promise or agreement,
 - If any such promise or agreement was entirely or partly in writing, please give the verbatim terms and language,
 - Any requirement or obligation on the part of the plaintiff,
 - Each reason or purpose of any such promise or agreement,
 - The circumstances and conditions present when any such promise or agreement was made,
 - The kind and type of any financial or other support or benefit promised or agreed to by you for the benefit of the plaintiff, and
 - Your performance in living up to or carrying out your commitment to any such promise or agreement, giving the dates and your conduct.
17. During the course of your relationship with the plaintiff, did you make any promise or agreement of a financial nature relating in any way to your designating the plaintiff as a beneficiary of any retirement or other funds?
18. If your answer to the preceding interrogatory is in the affirmative, please state in detail as to any such promise or agreement:
- The approximate date and place of the making of any such promise or agreement,
 - If any such promise or agreement was oral, give the substance of who said what to whom on each subject matter,
 - If any such promise or agreement was entirely or partly in writing, please give the verbatim terms and language,
 - Any requirement or obligation on the part of the plaintiff,
 - Each reason or purpose of any such promise or agreement,
 - The circumstances and conditions present when any such promise or agreement was made,
 - The kind and type of any financial or other support or benefit promised or agreed to by you for the benefit of the plaintiff, and
 - Your performance in living up to or carrying out your commitment to any such promise or agreement, giving the dates and your conduct.
19. During the course of your relationship with the plaintiff, did you make any promise or agreement of a financial nature relating in any way to providing for the comfort and support of the plaintiff at any time during or after the termination of your relationship with the plaintiff?
20. If your answer to the preceding interrogatory is in the affirmative, please state in detail as to any such promise or agreement:
- The approximate date and place of the making of any such promise or agreement,
 - If any such promise or agreement was oral, give the substance of who said what to whom on each subject matter,
 - If any such promise or agreement was entirely or partly in writing, please give the verbatim terms and language,
 - Any requirement or obligation on the part of the plaintiff,

- e. Each reason or purpose of any such promise or agreement,
 - f. The circumstances and conditions present when any such promise or agreement was made,
 - g. The kind and type of any financial or other support or benefit promised or agreed to by you for the benefit of the plaintiff, and
 - h. Your performance in living up to or carrying out your commitment to any such promise or agreement, giving the dates and your conduct.
21. During the time period of your cohabitation or living together with the plaintiff, please state in detail how the household and other financial matters were handled, including the following:
- a. The inclusive dates when the cohabitation or living together with the plaintiff began and ended,
 - b. A description of how the household and other financial matters were handled by you and the plaintiff,
 - c. A listing of bills and expenses paid for only by you separate and apart from the plaintiff, including type, amount and frequency,
 - d. A listing of bills and expenses paid for only by the plaintiff separate and apart from you, including type, amount and frequency, and
 - e. A listing of bills and expenses paid for only by any third person, such as another family member, other than either you or the plaintiff indicating type, amount, frequency and the identity of each such third person.
22. During the time period of your cohabitation or living together with the plaintiff, please state whether you and the plaintiff at any time shared or jointly used any item of real or personal property?
23. If your answer to the preceding interrogatory is in the affirmative, please state as to any such sharing or joint use:
- a. The inclusive dates when such sharing or joint use by you with the plaintiff began and ended,
 - b. A description of each sharing or joint use,
 - c. An identification of each item of real or personal property involved in any such sharing or joint use,
 - d. A description of how and in what manner each such item of real or personal property was shared or jointly used,
 - e. The purpose and reason for the sharing or joint use by you and the plaintiff, and
 - f. Your expectation of the arrangement or disposition of each such item of shared or jointly used real or personal property upon the termination of the cohabitation relationship between you and the plaintiff.
24. During the time period of your cohabitation or living together with the plaintiff, did you share or jointly use any item described as a car, truck or other motor vehicle?
25. If your answer to the preceding interrogatory is in the affirmative, please state as to any such sharing or joint use:
- a. The inclusive dates when such sharing or joint use by you with the plaintiff began and ended,

- b. A description of each item of property, including its make, model and year,
 - c. A description of how and in what manner each such item was shared or jointly used,
 - d. The nature and extent of the use by the plaintiff,
 - e. The nature and extent of the use by the defendant, and
 - f. The identity of the person, whether the plaintiff or the defendant, who actually paid the expenses involved in each such use, indicating who paid what.
26. During the time period of your cohabitation or living together with the plaintiff, did you share or jointly use any item of real estate including any house or apartment?
27. If your answer to the preceding interrogatory is in the affirmative, please state as to any such sharing or joint use:
- a. The inclusive dates when such sharing or joint use by you with the plaintiff began and ended,
 - b. A description of each item of property, including its make, model and year,
 - c. A description of how and in what manner each such item was shared or jointly used,
 - d. The nature and extent of the use by the plaintiff,
 - e. The nature and extent of the use by the defendant,
 - f. The identity of the person, whether the plaintiff or the defendant, who actually paid the expenses involved in each such use, indicating who paid what, and
 - g. The identify of the person or persons used in the title or the lease.
28. During the time period of your cohabitation or living together with the plaintiff, did you share or jointly use any item of recreational equipment, including any boat, trailer, motor home or recreational vehicle?
29. If your answer to the preceding interrogatory is in the affirmative, please state as to any such sharing or joint use:
- a. The inclusive dates when such sharing or joint use by you with the plaintiff began and ended,
 - b. A description of each item of property, including its make, model and year,
 - c. A description of how and in what manner each such item was shared or jointly used,
 - d. The nature and extent of the use by the plaintiff,
 - e. The nature and extent of the use by the defendant, and
 - f. The identity of the person, whether the plaintiff or the defendant, who actually paid the expenses involved in each such use, indicating who paid what.
30. During the time period of your cohabitation or living together with the plaintiff, did you share or jointly use any item related to any employment or business?
31. If your answer to the preceding interrogatory is in the affirmative, please state as to any such sharing or joint use:
- a. The inclusive dates when such sharing or joint use by you with the plaintiff began and ended,
 - b. A description of each item of property, including its make, model and year,

- c. A description of how and in what manner each such item was shared or jointly used,
 - d. The nature and extent of the use by the plaintiff,
 - e. The nature and extent of the use by the defendant, and
 - f. The identity of the person, whether the plaintiff or the defendant, who actually paid the expenses involved in each such use, indicating who paid what.
32. During the time period of your cohabitation or living together with the plaintiff, please state whether you and the plaintiff purchased or acquired any real or personal property in your joint names?
33. If your answer to the preceding interrogatory is in the affirmative, please state as to each item of property purchased or acquired in your joint names:
 - a. The approximate date of each such purchase or acquisition,
 - b. A description of each such item,
 - c. The approximate value of each such item,
 - d. The name or names involved in the new title to each such item,
 - e. The source of the money or funds used to make each such purchase or acquisition,
 - f. The location of each such item,
 - g. The circumstances and conditions involved in each such purchase or acquisition,
 - h. The nature and extent of the use of each such item by the plaintiff, and
 - i. The nature and extent if the use of each item by the defendant.
34. During the time period of your cohabitation or living together with the plaintiff, please state whether any child was born with you and the plaintiff as the parents of any such child?
35. If your answer to the preceding interrogatory is in the affirmative, please state as to any such child:
 - a. The full name,
 - b. The date of birth, and
 - c. The place of birth.
36. During the time period of your cohabitation or living together with the plaintiff, please state whether any child was cared for by either you or the plaintiff?
37. If your answer to the preceding interrogatory is in the affirmative, please state as to any such child:
 - a. The full name,
 - b. The date of birth,
 - c. The identity, including name and address, of each parent of any such child, and
 - d. The inclusive dates of any such caring, including each date when the caring began and ended.
38. During the time period of your cohabitation or living together with the plaintiff, please state whether any child was provided any financial support or financial assistance?

39. If your answer to the preceding interrogatory is in the affirmative, please state as to any such support or assistance:
- a. The full name of each such child,
 - b. The inclusive dates of any such support or assistance, including the date when the support or assistance began and ended,
 - c. The dollar amount provided only by the plaintiff,
 - d. The dollar amount provided only by the defendant, and
 - e. The dollar amount provided only by any third person, identifying such third person by name and address.
40. During the time period of your cohabitation or living together with the plaintiff, please state whether either you or the plaintiff were involved in any child rearing activities?
41. If your answer to the preceding interrogatory is in the affirmative, please state as to any such child rearing activities:
- a. The full name of each child involved,
 - b. The inclusive dates of any such child rearing activities, including the dates when any such child rearing activities began and ended,
 - c. A description of each type of child rearing activity,
 - d. The amount of time spent together or jointly by you and the plaintiff,
 - e. The amount of time spent separately only by the plaintiff providing any such child rearing activities, and
 - f. The amount of time spent separately only by the defendant providing any such child rearing activities.
42. During the time period of your cohabitation or living together with the plaintiff, please state whether the plaintiff provided or performed services to or for the cohabitation relationship between you and the plaintiff, including any advice and counsel, financial aid, homemaking services, child rearing activities, working in the defendant's business, or otherwise?
43. If your answer to the preceding interrogatory is in the affirmative, please state as to each such service provided by the plaintiff:
- a. A description of each such service,
 - b. The dates of each such service,
 - c. The approximate amount of time, on a weekly, monthly or annual basis, spent by the plaintiff on all such services,
 - d. The inclusive dates of such services, including the dates when such services began and ended,
 - e. The frequency, on a weekly, monthly or annual basis, of the performance of such services,
 - f. The estimated fair market value of all such services as if such services had been provided at commercially competitive rates, and
 - g. An identification and description of each financial opportunity given up by the plaintiff in order to provide such services, including the type and any projected income.