

Defendant Payor's Completion of Education or Training Program.

1. Please state as to each degree in professional education received by the defendant:
 - a. The professional field or area,
 - b. The name and address of each school granting each degree,
 - c. The inclusive dates of attendance, indicating the approximate date when each such course began and ended,
 - d. A description of each course of study,
 - e. The name of each major or minor field of study involved or declared,
 - f. A description of all credits obtained,
 - g. A description of all honors received,
 - h. A description of all grades earned, indicating the defendant's grade point average, any failed courses and any academic probation involved, and
 - i. A description of each degree received.
2. While defendant was undertaking or pursuing a degree in professional education, please describe the defendant's circumstances, commitments and lifestyle conditions, including but without limitation, the following:
 - a. Employment on a part-time or full-time basis,
 - b. Extra curricular activities,
 - c. Marriage,
 - d. Plaintiff's financial and economic contribution, and
 - e. Defendant's financial and economic contribution.
3. While the defendant was undertaking or pursuing a degree in professional education, did the plaintiff make any contribution or assistance to the defendant?
4. If your answer to the preceding interrogatory is in the affirmative, please state each and every contribution and assistance given by the plaintiff to the defendant, including but without limitation, the following:
 - a. Financial contribution or assistance,
 - b. Emotional support,
 - c. Furnishing of services,
 - d. Maintenance of household, and
 - e. Other contribution or assistance.
5. While the defendant was undertaking or pursuing a degree in education, did any other person make any contribution or assistance to the defendant?
6. If your answer to the preceding interrogatory is in the affirmative, please state each and every contribution and assistance given by any other person to the defendant, including but without limitation, the following:
 - a. Financial contribution or assistance,
 - b. Emotional support,
 - c. Furnishing of services,
 - d. Maintenance of household, and
 - e. Other contribution or assistance.

7. As to each degree in professional education undertaken or pursued by the defendant, please identify the type of employment being prepared for, including but without limitation, the following:
 - a. Various job opportunities related to such degree,
 - b. The average or range of salaries in such job opportunity areas, and
 - c. The availability of such jobs in such job opportunity areas.
8. In connection with the defendant's undertaking or pursuit of a degree in professional education, please state if there was any qualifying examination or test before the defendant could undertake or pursue such degree?
9. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The date of each exam or test taken by the defendant, and
 - b. Whether the defendant passed each such exam or test.
10. Please state as to each degree in any technical education received by the defendant:
 - a. The professional field or area,
 - b. The name and address of each school granting each degree,
 - c. The inclusive dates of attendance, indicating the approximate date when each such course began and ended,
 - d. A description of each course of study,
 - e. The name of each major or minor field of study involved or declared,
 - f. A description of all credits obtained,
 - g. A description of all honors received,
 - h. A description of all grades earned, indicating the defendant's grade point average, any failed courses and any academic probation involved, and
 - i. A description of each degree received.
11. While defendant was undertaking or pursuing a degree in any technical education, please describe the defendant's circumstances, commitments and lifestyle conditions, including but without limitation, the following:
 - a. Employment on a part-time or full-time basis,
 - b. Extra curricular activities,
 - c. Marriage,
 - d. Plaintiff's financial and economic contribution, and
 - e. Defendant's financial and economic contribution.
12. While the defendant was undertaking or pursuing a degree in any technical education, did the plaintiff make any contribution or assistance to the defendant?
13. If your answer to the preceding interrogatory is in the affirmative, please state each and every contribution and assistance given by the plaintiff to the defendant, including but without limitation, the following:
 - a. Financial contribution or assistance,
 - b. Emotional support,
 - c. Furnishing of services,

- d. Maintenance of household, and
 - e. Other contribution or assistance.
14. While the defendant was undertaking or pursuing a degree in any technical education, did any other person make any contribution or assistance to the defendant?
15. If your answer to the preceding interrogatory is in the affirmative, please state each and every contribution and assistance given by any other person to the defendant, including but without limitation, the following:
- a. Financial contribution or assistance,
 - b. Emotional support,
 - c. Furnishing of services,
 - d. Maintenance of household, and
 - e. Other contribution or assistance.
16. As to each degree in any technical education undertaken or pursued by the defendant, please identify the type of employment being prepared for, including but without limitation, the following:
- a. Various job opportunities related to such degree,
 - b. The average or range of salaries in such job opportunity areas, and
 - c. The availability of such jobs in such job opportunity areas.
17. In connection with the defendant's undertaking or pursuit of a degree in any technical education, please state if there was any qualifying examination or test before the defendant could undertake or pursue such degree?
18. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The date of each exam or test taken by the defendant, and
 - b. Whether the defendant passed each such exam or test.
19. Please state as to each degree in any specialized training program received by the defendant:
- a. The professional field or area,
 - b. The name and address of each school granting each degree,
 - c. The inclusive dates of attendance, indicating the approximate date when each such course began and ended,
 - d. A description of each course of study,
 - e. The name of each major or minor field of study involved or declared,
 - f. A description of all credits obtained,
 - g. A description of all honors received,
 - h. A description of all grades earned, indicating the defendant's grade point average, any failed courses and any academic probation involved, and
 - i. A description of each degree received.
20. While defendant was undertaking or pursuing a degree in any specialized training program, please describe the defendant's circumstances, commitments and lifestyle conditions, including but without limitation, the following:

- a. Employment on a part-time or full-time basis,
 - b. Extra curricular activities,
 - c. Marriage,
 - d. Plaintiff's financial and economic contribution, and
 - e. Defendant's financial and economic contribution.
21. While the defendant was undertaking or pursuing a degree in any specialized training program, did the plaintiff make any contribution or assistance to the defendant?
22. If your answer to the preceding interrogatory is in the affirmative, please state each and every contribution and assistance given by the plaintiff to the defendant, including but without limitation, the following:
- a. Financial contribution or assistance,
 - b. Emotional support,
 - c. Furnishing of services,
 - d. Maintenance of household, and
 - e. Other contribution or assistance.
23. While the defendant was undertaking or pursuing a degree in any specialized training program, did any other person make any contribution or assistance to the defendant?
24. If your answer to the preceding interrogatory is in the affirmative, please state each and every contribution and assistance given by any other person to the defendant, including but without limitation, the following:
- a. Financial contribution or assistance,
 - b. Emotional support,
 - c. Furnishing of services,
 - d. Maintenance of household, and
 - e. Other contribution or assistance.
25. As to each degree in any specialized training program undertaken or pursued by the defendant, please identify the type of employment being prepared for, including but without limitation, the following:
- a. Various job opportunities related to such degree,
 - b. The average or range of salaries in such job opportunity areas, and
 - c. The availability of such jobs in such job opportunity areas.
26. In connection with the defendant's undertaking or pursuit of a degree in any specialized training program, please state if there was any qualifying examination or test before the defendant could undertake or pursue such degree?
27. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The date of each exam or test taken by the defendant, and
 - b. Whether the defendant passed each such exam or test.
28. In connection with the defendant's work or efforts in any specialized area, did the defendant receive any award or certification?

29. If your answer to the preceding interrogatory is in the affirmative, please state as to any such award or certification received:
- A description of each award or certification,
 - The approximate date received,
 - All actions taken to qualify,
 - The name and address of the organization awarding the award or certification, and
 - The effect of any such award or certification on any job qualifications or on any salary or other compensation.

Defendant Payor's Failure To Complete Education.

- Please state as to each degree in professional education pursued by or attempted to be attained by the defendant but where the defendant was unable or failed to obtain any such degree:
 - The professional field or area,
 - The name and address of each school granting each degree,
 - The inclusive dates of attendance, indicating the approximate date when each such course began and ended,
 - A description of each course of study,
 - The name of each major or minor field of study involved or declared,
 - A description of all credits obtained and all credits not obtained,
 - A description of all honors received and all honors not received,
 - A description of all grades earned and all grades not earned, indicating the defendant's cumulative grade point average,
 - A description of each course passed and each course failed,
 - A description of any academic probation, identifying each course involved, and
 - A description of each degree pursued but not received.
- As to each degree in professional education pursued by or attempted to be attained by the defendant but where the defendant was unable or failed to obtain any such degree, please state in detail each reason and explanation why each such degree was not obtained, including but without limitation:
 - The defendant's marriage commitments or problems,
 - The lack of sufficient financial resources,
 - The defendant's employment on a part-time or full-time basis,
 - The defendant's illness, disease or disability,
 - Family circumstances placing financial, time or other restrictions or requirements on the defendant,
 - The defendant's inability to pass any course, identifying each such course,
 - The defendant's extracurricular activities, and
 - Any other reason or explanation.
- Please state as to each degree in technical education pursued by or attempted to be attained by the defendant but where the defendant was unable or failed to obtain any such degree:

- a. The professional field or area,
- b. The name and address of each school granting each degree,
- c. The inclusive dates of attendance, indicating the approximate date when each such course began and ended,
- d. A description of each course of study,
- e. The name of each major or minor field of study involved or declared,
- f. A description of all credits obtained and all credits not obtained,
- g. A description of all honors received and all honors not received,
- h. A description of all grades earned and all grades not earned, indicating the defendant's cumulative grade point average,
- i. A description of each course passed and each course failed,
- j. A description of any academic probation, identifying each course involved, and
- k. A description of each degree pursued but not received.

4. Please state as to each degree in technical education pursued by or attempted to be attained by the defendant but where the defendant was unable or failed to obtain any such degree:

- a. The professional field or area,
- b. The name and address of each school granting each degree,
- c. The inclusive dates of attendance, indicating the approximate date when each such course began and ended,
- d. A description of each course of study,
- e. The name of each major or minor field of study involved or declared,
- f. A description of all credits obtained and all credits not obtained,
- g. A description of all honors received and all honors not received,
- h. A description of all grades earned and all grades not earned, indicating the defendant's cumulative grade point average,
- i. A description of each course passed and each course failed,
- j. A description of any academic probation, identifying each course involved, and
- k. A description of each degree pursued but not received.

5. As to each degree in any specialized training program pursued by or attempted to be attained by the defendant but where the defendant was unable or failed to obtain any such degree, please state in detail each reason and explanation why each such degree was not obtained, including but without limitation:

- a. The defendant's marriage commitments or problems,
- b. The lack of sufficient financial resources,
- c. The defendant's employment on a part-time or full-time basis,
- d. The defendant's illness, disease or disability,
- e. Family circumstances placing financial, time or other restrictions or requirements on the defendant,
- f. The defendant's inability to pass any course, identifying each such course,
- g. The defendant's extracurricular activities, and
- h. Any other reason or explanation.

6. As to each degree in any specialized training program pursued by or attempted to be attained by the defendant but where the defendant was unable or failed to obtain any such degree, please state in detail each reason and explanation why each such degree was not obtained, including but without limitation:
 - a. The defendant's marriage commitments or problems,
 - b. The lack of sufficient financial resources,
 - c. The defendant's employment on a part-time or full-time basis,
 - d. The defendant's illness, disease or disability,
 - e. Family circumstances placing financial, time or other restrictions or requirements on the defendant,
 - f. The defendant's inability to pass any course, identifying each such course,
 - g. The defendant's extracurricular activities, and
 - h. Any other reason or explanation.
7. In connection with the defendant's undertaking or pursuit of any degree in education, please state if there was any qualifying exam or test required before the defendant could undertake or pursue such degree and the defendant failed or was unable to take any such qualifying exam or test?
8. If your answer to the preceding interrogatory is in the affirmative, please state each reason or explanation why the defendant failed or was unable to take any such qualifying exam or test, including but without limitation, the following:
 - a. The date of each such exam or test when it was available but not taken by the defendant,
 - b. Each reason or explanation why each such exam or test was not taken, and
 - c. All defendant's plans regarding any future attempts or efforts to take such exam or test.
9. In connection with the defendant's undertaking or pursuit of any degree in education, please state if the defendant took any qualifying exam or test but either failed or was unable to pass such exam or test?
10. If your answer to the preceding interrogatory is in the affirmative, please state:
 - a. The date of each exam or test, and
 - b. The score received on each exam or test, indicating the score required for passing.
11. If, in connection with the defendant's undertaking or pursuit of any degree in education, the defendant took and failed or was unable to pass any qualifying exam or test, please state the result of any such failure or inability to pass any such exam or test, indicating but without limitation:
 - a. Any loss of employment, title or duties,
 - b. Any reduction in pay,
 - c. Any transfer to other employment, and
 - d. Any other result.
12. Is it the defendant's allegation, contention or belief that the defendant's loss of

- employment prevented or prevents the continuation of the defendant's financial or other support of the plaintiff by the defendant?
13. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such allegation, contention or belief.
 14. Is it the defendant's allegation, contention or belief that the defendant's loss of income prevented or prevent the continuation of the defendant's financial or other support of the plaintiff by the defendant?
 15. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such allegation, contention or belief.
 16. Is it the defendant's allegation, contention or belief that the defendant's educational debts incurred prevented or prevents the contribution of the defendant's financial or other support of the plaintiff by the defendant?
 17. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such allegation, contention or belief.
 18. Is it the defendant's allegation, contention or belief that the defendant's inability to obtain the job or position contemplated in any agreement prevented or prevents the continuation of the defendant's financial or other support of the plaintiff by the defendant?
 19. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such allegation, contention or belief.

Defendant Payor's Disease or Illness.

1. Does the defendant have any injury, disease, illness or disability which adversely affects the defendant's ability to make payments to the plaintiff?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to any such injury, illness, disease or disability:
 - a. A description of each such injury, illness disease or disability, indicating whether it is chronic, acute or curable,
 - b. The date each such injury, illness, disease or disability was diagnosed,
 - c. The signs and symptoms of each such diagnosis,
 - d. The name and address of each health care professional making any such diagnosis,
 - e. The prognosis or expected future outcome of each such injury, illness, disease or disability, indicating the expected duration, residual effects and treatment required,
 - f. Each limitation on the defendant's activities as a result of each injury, disease, illness and disability,
 - g. A description of the treatment for the defendant, indicating the frequency, and
 - h. The cost of each treatment.
3. If the defendant has any injury, illness, disease or disability which adversely affects the defendant's ability to make payments to the plaintiff, please describe the effect on the defendant's work or employability, indicating whether the defendant lost any paid or unpaid time from work.
4. If the defendant has any injury, illness, disease or disability which adversely affects the defendant's ability to make payments to the plaintiff, please describe the effect on the

defendant's work or employability, including but without limitation, any loss of job, assignment or contract:

- a. A description of any loss of job, assignment or contract,
 - b. The name and address of the defendant's employer,
 - c. The circumstances and conditions of any such loss of job, assignment or contract,
 - d. The approximate date of any such loss of job, assignment or contract, and
 - e. Each reason or explanation given to the defendant for any such loss of job, assignment or contract.
5. If the defendant has any injury, illness, disease or disability which adversely affects the defendant's ability to make payments to the plaintiff, please describe the cost, both financially and otherwise, of each such injury, illness, disease or disability, indicating, but without limitation, the following:
- a. The costs of each health care provider, whether paid for by insurance or self pay,
 - b. The costs of all care and treatment, whether paid for by insurance or self pay,
 - c. The costs of all medicine and medications, whether paid for by insurance or self pay,
 - d. The costs of all appliances and therapeutic aids, whether paid for by insurance or self pay, and
 - e. Other costs.

Defendant Payor's Increase in Income.

1. Within the past three years, has there been an increase in the defendant's income from all sources?
2. If your answer to the preceding interrogatory is in the affirmative, please state as to each such increase:
 - a. A description of each source of the defendant's income which has increased,
 - b. The amount of each increase from each such source, and
 - c. The date of each increase from each such source.
3. Within the past three years, has there been any increase in the defendant's income from employment or self-employment?
4. If your answer to the preceding interrogatory is in the affirmative, please state as to any such income from the defendant's employment or self-employment:
 - a. The amount of income at the time of any agreement with the plaintiff or any order of the court,
 - b. The date of each increase,
 - c. The amount of each increase,
 - d. The name and address of each employer or self employment,
 - e. A description of the defendant's job or position, indicating any change, whether in title, duties or increased hours,
 - f. The defendant's employment income on an annual basis for the past three years,
 - g. The date and amount of any bonus paid to the defendant for the past three years,
 - h. The date and amount of any compensation to the defendant which was deferred

- or assigned for the past three years,
- i. The date and amount of any other special form of compensation to the defendant for the past three years, and
 - j. Each reason or explanation for any increase in the defendant's income from employment or self-employment.
5. Within the past three years, has there been any increase in the defendant's income from free-lance or contract work?
6. If your answer to the preceding interrogatory is in the affirmative, please state as to any such income to the defendant from free-lance or contract work:
- a. The amount of income at the time of any agreement with the plaintiff or any order of the court,
 - b. The date of each increase,
 - c. The amount of each increase,
 - d. The name and address of each person, firm or corporation paying such income to the defendant,
 - e. A description of the defendant's job or position, indicating any change, whether in title, duties or increased hours,
 - f. The defendant's free-lance or contract work income on an annual basis for the past three years,
 - g. A description of all work done and any increase or change in such work related to such free-lance or contract work,
 - h. A description of all hours spent and any increase or change in such work related to such free-lance or contract work, and
 - i. Each reason or explanation for any increase in the defendant's income from free-lance or contract work.
7. Within the past three years, has there been any increase in the defendant's investment income?
8. If your answer to the preceding interrogatory is in the affirmative, please state as to any such investment income to the defendant:
- a. The amount of income at the time of any agreement with the plaintiff or any order of the court,
 - b. The date of each increase,
 - c. Any increase in dividend income, whether dividends paid, dividends reinvested or stock dividends paid,
 - d. Any increase in any interest income paid,
 - e. Any increase in any refunds paid,
 - f. Any increase in any other investment income distributions received, and
 - g. Each reason or explanation for any increase in the defendant's investment income.
9. Within the past three years, has there been any increase in the defendant's income due to the sale or disposition of the defendant's assets?
10. If your answer to the preceding interrogatory is in the affirmative, please state as to any such income from the sale or disposition of the defendant's assets:

- a. The amount of income to the defendant at the time of any agreement with the plaintiff or any order of the court,
- b. The date of each increase,
- c. The amount of each increase,
- d. The fair market value of each item sold,
- e. The date of sale of each item,
- f. The amount received by the defendant from the sale of each item, and
- g. Each reason or explanation for any increase in the defendant's income from the sale or disposition of the defendant's assets.

11. Within the past three years, has there been any increase in the defendant's income due to the defendant receiving any inheritance or gift?

12. If your answer to the preceding interrogatory is in the affirmative, please state as to each such inheritance or gift:

- a. The amount of income to the defendant from any inheritance or gift at the time of any agreement with the plaintiff or any order of the court,
- b. The date of each increase,
- c. The amount of each increase,
- d. The fair market value of each item of inheritance or gift,
- e. The date of the receipt by the defendant of each item of inheritance or gift,
- f. The amount received by the defendant from each item of inheritance or gift,
- g. A description of each item of inheritance or gift,
- h. The disposition made by the defendant upon the receipt of each item of inheritance or gift, and
- i. Each reason or explanation for any increase in the defendant's income due to the defendant receiving any inheritance or gift.

13. Within the past three years, has there been any increase in the defendant's income from any source other than those referred to in the immediately preceding interrogatories?

14. If your answer to the preceding interrogatory is in the affirmative, please state as to each other source of income:

- a. A description of each such other source of income,
- b. The date of each increase,
- c. The amount of each increase, and
- d. Each reason or explanation for any increase in the defendant's income from each other source.