

## CHANGE AFFECTING PARTY RECEIVING ALIMONY OR MAINTENANCE

## Plaintiff Payee's Remarriage.

1. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued as a result of the plaintiff's remarriage because the plaintiff's new spouse's income has increased the plaintiff's ability to provide for the plaintiff's own support, please state in detail the factual basis for such allegation, contention or belief.
2. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued as a result of the plaintiff's remarriage because the plaintiff's new spouse contributes to the payment of the plaintiff's household expenses, please state in detail the factual basis for such allegation, contention or belief.
3. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued as a result of the plaintiff's remarriage because the plaintiff's employment status has improved as a result of the plaintiff's marriage either as to an increase in work or as to an increase income earned, or both, please state in detail the factual basis for such allegation, contention or belief.
4. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued as a result of the plaintiff's remarriage because the plaintiff now has sufficient property to provide for the plaintiff's reasonable needs, please state in detail the factual basis for such allegation, contention or belief.
5. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued because the plaintiff's new spouse is not an additional financial burden since the plaintiff's new spouse could be employed, please state in detail the factual basis for any such allegation, contention or belief.
6. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued because the plaintiff's new spouse is not an additional financial burden since the plaintiff's new spouse does not require plaintiff's support, please state in detail the factual basis for any such allegation, contention or belief.
7. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued because the plaintiff's new spouse is not an additional financial burden since the plaintiff's new spouse could contribute other income, please state in detail the factual basis for any such allegation, contention or belief.
8. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued because the plaintiff's new spouse is not an additional financial burden since the plaintiff's new spouse does not add to the cost of the plaintiff's household, please state in detail the factual basis for any such allegation, contention or belief.

## Plaintiff Payee's Cohabitation.

1. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued as a result of the plaintiff's cohabitation because the cohabitant's income increases the plaintiff's ability to provide for the plaintiff's support either through an increase in the house hold income or a decrease in the overall share of household expenses, or both, please state in detail the factual basis for such allegation, contention or belief.

2. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued as a result of the plaintiff's cohabitation because the cohabitant contributes to the payment of the plaintiff's household expenses, please state in detail the factual basis for such allegation, contention or belief.
3. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued as a result of the plaintiff's cohabitation because the plaintiff's employment status has improved as a result of the cohabitation, please state in detail the factual basis for such allegation, contention or belief.
4. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued as a result of the plaintiff's cohabitation because the plaintiff now has sufficient property to provide for the reasonable needs of the plaintiff, please state in detail the factual basis for such allegation, contention or belief.
5. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued because the plaintiff's new spouse is not an additional financial burden since the plaintiff's cohabitant could be employed, please state in detail the factual basis for any such allegation, contention or belief.
6. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued because the plaintiff's new spouse is not an additional financial burden since the plaintiff's cohabitant does not require the plaintiff's support, please state in detail the factual basis for any such allegation, contention or belief.
7. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued because the plaintiff's new spouse is not an additional financial burden since the plaintiff's cohabitant could contribute to household expenses, please state in detail the factual basis for any such allegation, contention or belief.
8. If it is the defendant's allegation, contention or belief that payments to the plaintiff should be decreased or discontinued because the plaintiff's new spouse is not an additional financial burden since the plaintiff's cohabitant does not add to the cost of the household, please state in detail the factual basis for any such allegation, contention or belief.

Period of Plaintiff Payee's Unemployability.

1. If it is the defendant's allegation, contention or belief that the plaintiff has not made a good-faith attempt to find employment, please state in detail:
  - a. Each source of the defendant's knowledge, giving name and address, regarding the plaintiff's acts or omissions, and
  - b. An identification of each act or activity either taken or not taken by the plaintiff to secure employment.
2. If it is the defendant's allegation, contention or belief that the plaintiff has not made reasonable efforts to keep any previous job or position, please state in detail:
  - a. Each source of the defendant's knowledge, giving name and address, regarding the plaintiff's acts or omissions,
  - b. An identification of each act or activity which the defendant would consider as a reasonable effort to keep any such job or position, and
  - c. An identification of each act or activity which the defendant would consider as reasonable in the plaintiff's circumstances.

3. If it is the defendant's allegation, contention or belief that the plaintiff could have had another position or other employment, please state in detail:
  - a. Each source of the defendant's knowledge, giving name and address, regarding the plaintiff's acts or omissions,
  - b. Each position or employment that the defendant alleges that the plaintiff could have had, and
  - c. Each position or employment, giving name and address, which was not taken but which the defendant considers reasonable based on the plaintiff's circumstances.
4. If it is the defendant's allegation, contention or belief that the plaintiff has not accepted any position or job offer made, please state in detail:
  - a. Each source of the defendant's knowledge, giving name and address, regarding the plaintiff's acts or omissions,
  - b. Each position or job offer made which the defendant alleges that the plaintiff has not accepted, and
  - c. Each position or job offer refused by the plaintiff which the defendant considers to be acceptable employment based upon the plaintiff's circumstances.

Plaintiff Payee's Disability.

1. If it is the defendant's allegation, contention or belief that the plaintiff does not have any physical disability, please state:
  - a. Each witness including name and address, with knowledge of plaintiff's abilities or nondisability,
  - b. A description of each daily activity which the defendant asserts that the plaintiff can perform,
  - c. A description of each work related activity which the defendant asserts that the plaintiff can perform, and
  - d. Each reason that the defendant asserts as to why the plaintiff is not working other than a disability.
2. If it is the defendant's assertion, allegation, contention or belief that the plaintiff does not have any mental disability, please state:
  - a. Each witness including name and address, with knowledge of plaintiff's abilities or non-disability,
  - b. A description of each daily activity which the defendant asserts that the plaintiff can perform,
  - c. A description of each work related activity which the defendant asserts that the plaintiff can perform, and
  - d. Each reason that the defendant asserts as to why the plaintiff is not working other than a disability.
3. If it is the defendant's assertion, allegation, contention or belief that the plaintiff does not have any combined physical and mental disability, please state:

- a. Each witness including name and address, with knowledge of plaintiff's abilities or non-disability,
  - b. A description of each daily activity which the defendant asserts that the plaintiff can perform,
  - c. A description of each work related activity which the defendant asserts that the plaintiff can perform, and
  - d. Each reason that the defendant asserts as to why the plaintiff is not working other than a disability.
4. If it is the defendant's assertion, allegation, contention or belief that the plaintiff lost or left a job or employment position for reasons other than disability, please state:
- a. Each employer's name and address,
  - b. Each reason the defendant asserts why the plaintiff lost or left each job or position,
  - c. The detailed factual basis for each assertion, and
  - d. Each action that the defendant asserts that the plaintiff should have taken to keep such job or position.
5. If it is the defendant's assertion, allegation, contention or belief that the plaintiff failed to obtain a job or employment position based on any disability, please state:
- a. A description of each job or position that the plaintiff can perform,
  - b. The location where each such job or position is available,
  - c. The availability of each such job or position, and
  - d. The detailed factual basis for each such assertion, allegation, contention or belief.
6. If it is the defendant's assertion, allegation, contention or belief that the plaintiff failed to obtain a job or employment position based on any disability, please state:
- a. A description of each action or activity which the defendant asserts should have been taken to obtain such job or position, and
  - b. The frequency of each such action.
- Plaintiff Payee's Completion of Education or Training Program.
1. If it is the defendant's allegation, contention or belief that the plaintiff requires less financial support due to the plaintiff's ability to obtain different employment, other employment or additional employment, please state:
- a. A description of each such different, other or additional employment,
  - b. The financial impact of each such different, other or additional employment, and
  - c. The detailed factual basis for each such allegation, contention or belief.
2. If it is the defendant's allegation, contention or belief that the plaintiff has not attempted to use education or employment training to obtain any job or position, please state:
- a. Each activity which the defendant alleges, contends or believes that the plaintiff should have pursued,

- b. Each use of the education or training program which the plaintiff could have pursued but which was not pursued, and
- c. The detailed factual basis for each such allegation, contention or belief.

Plaintiff Payee's Failure to Complete Education or Training Program.

1. If it is the defendant's allegation, contention or belief that the plaintiff deliberately failed or refused to complete the plaintiff's education or training program to better enable the plaintiff to be self supporting, please state:
  - a. Describe all actions which the defendant alleges, contends or believes that the plaintiff should have taken and did not,
  - b. Describe the financial impact on the plaintiff if the actions, which the defendant alleges, contends or believes should have been taken, were taken,
  - c. Describe all actions which the plaintiff took which adversely affected the plaintiff's ability to complete any education or training program,
  - d. Describe the financial impact on the plaintiff if the actions, which the defendant alleges, contends or believes adversely affected the plaintiff's ability to complete any education or training program, had been taken,
  - e. Describe all actions which the plaintiff could not take to complete any education or training program, and
  - f. Describe the financial impact on the plaintiff if the actions, which the defendant alleges, contends or believes could not be taken by the plaintiff to complete any education or training program, were not taken.
2. Please describe each effort involving a financial contribution by the defendant to help the plaintiff complete a professional degree, indicating:
  - a. The support of the defendant's family,
  - b. The payment of tuition, and
  - c. The payment of expenses.
3. Please describe each effort involving emotional support by the defendant to help the plaintiff to complete a professional degree, indicating:
  - a. A description of each such emotional support effort, and
  - b. The name and address of each witness to each such emotional support effort.
4. Please describe each effort involving any contribution to household maintenance by the defendant to help the plaintiff complete a professional degree, indicating:
  - a. A description of each effort to clean and maintain the house,
  - b. A description of nature, extent and frequency of any cooking,
  - c. A description of the nature, extent and frequency of any child care, and
  - d. A description of the nature, extend and frequency of any elder care.
5. Please describe each effort involving a financial contribution by the defendant to help the plaintiff complete a technical degree, indicating:

- a. The support of the defendant's family,
  - b. The payment of tuition, and
  - c. The payment of expenses.
6. Please describe each effort involving emotional support by the defendant to help the plaintiff complete a technical degree, indicating:
- a. A description of each such emotional support effort, and
  - b. The name and address of each witness to each such emotional support effort.
7. Please describe each effort involving any contribution to household maintenance by the defendant to help the plaintiff complete a technical degree, indicating:
- a. A description of each effort to clean and maintain the house,
  - b. A description of the nature, extent and frequency of any cooking,
  - c. A description of the nature, extent and frequency of any child care, and
  - d. A description of the nature, extent and frequency of any elder care.
8. Please describe each effort involving a financial contribution by the defendant to help the plaintiff complete a specialized training program, indicating:
- a. The support of the defendant's family,
  - b. The payment of tuition, and
  - c. The payment of expenses.
9. Please describe each effort involving emotional support by the defendant to help the plaintiff complete a specialized training program, indicating:
- a. A description of each such emotional support effort, and
  - b. The name and address of each witness to each such emotional support effort.
10. Please describe each effort involving any contribution to household maintenance by the defendant to help the plaintiff complete a specialized training program, indicating:
- a. A description of each effort to clean and maintain the house,
  - b. A description of the nature, extent and frequency of any cooking,
  - c. A description of the nature, extent and frequency of any child care, and
  - d. A description of the nature, extent and frequency of any elder care.
11. Please describe each effort involving a financial contribution by the defendant to help the plaintiff obtain certification, indicating:
- a. The support of the defendant's family,
  - b. The payment of tuition, and
  - c. The payment of expenses.
12. Please describe each effort involving emotional support by the defendant to help the plaintiff obtain certification, indicating:

- a. A description of each such emotional support effort, and
  - b. The name and address of each witness to each such emotional support effort.
13. Please describe each effort involving any contribution to household maintenance by the defendant to help the plaintiff obtain certification, indicating:
- a. A description of each effort to clean and maintain the house,
  - b. A description of the nature, extent and frequency of any cooking,
  - c. A description of the nature, extent and frequency of any child care, and
  - d. A description of the nature, extent and frequency of any elder care.
14. In connection with the plaintiff's failure or inability to complete any education or training program, please describe all obstacles to the plaintiff's efforts to obtain a professional degree, including, but without limitation:
- a. The defendant's inability to provide adequate financial support,
  - b. The defendant's inability to provide adequate emotional support,
  - c. The defendant's disagreement or uncertainty over whether the plaintiff should pursue any such education or training program,
  - d. The defendant's own pursuit of education or a training program,
  - e. The defendant's medical condition,
  - f. The defendant's dislike of the employment situation,
  - g. The defendant's desire to have children, and
  - h. Any other obstacle.
15. In connection with the plaintiff's failure or inability to complete any education or training program, please describe all obstacles to the plaintiff's efforts to obtain a technical degree, including, but without limitation:
- a. The defendant's inability to provide adequate financial support,
  - b. The defendant's inability to provide adequate emotional support,
  - c. The defendant's disagreement or uncertainty over whether the plaintiff should pursue any such education or training program,
  - d. The defendant's own pursuit of education or a training program,
  - e. The defendant's medical condition,
  - f. The defendant's dislike of the employment situation,
  - g. The defendant's desire to have children, and
  - h. Any other obstacle.
16. In connection with the plaintiff's failure or inability to complete any education or training program, please describe all obstacles to the plaintiff's efforts to complete a specialized training program, including, but without limitation:
- a. The defendant's inability to provide adequate financial support,
  - b. The defendant's inability to provide adequate emotional support,
  - c. The defendant's disagreement or uncertainty over whether the plaintiff should pursue any such education or training program,
  - d. The defendant's own pursuit of education or a training program,
  - e. The defendant's medical condition,

- f. The defendant's dislike of the employment situation,
- g. The defendant's desire to have children, and
- h. Any other obstacle.

17. In connection with the plaintiff's failure or inability to complete any education or training program, please describe all obstacles to the plaintiff's efforts to obtain certification, including, but without limitation:

- a. The defendant's inability to provide adequate financial support,
- b. The defendant's inability to provide adequate emotional support,
- c. The defendant's disagreement or uncertainty over whether the plaintiff should pursue any such education or training program,
- d. The defendant's own pursuit of education or a training program,
- e. The defendant's medical condition,
- f. The defendant's dislike of the employment situation,
- g. The defendant's desire to have children, and
- h. Any other obstacle.

Plaintiff Payee's Injury, Disease or Illness.

1. If it is the defendant's allegation, contention or belief that the plaintiff does not have a disabling injury, disease or illness, please state:

- a. The detailed factual basis for each of the defendant's allegations, contention or beliefs,
- b. A description of each of the defendant's sources of information for each allegation, contention or belief, and
- c. The name and address of each person who has a personal knowledge of any facts relating to the defendant's allegations, contentions or beliefs.

2. If it is the defendant's allegation, contention or belief that any injury, disease or illness which the plaintiff has should not affect any payment by the defendant to the plaintiff, please state:

- a. The detailed factual basis for each of the defendant's allegations, contentions or beliefs,
- b. A description of each of the defendant's sources of information for each allegation, contention or belief, and
- c. The name and address of each person who has personal knowledge of any facts relating to the defendant's allegations, contentions or beliefs.

3. If it is the defendant's allegation, contention or belief that the plaintiff's ability to work is not affected by any injury, disease or illness, please state:

- a. The detailed factual basis for each of the defendant's allegations, contentions or beliefs,
- b. A description of each of the defendant's sources of information for each allegation, contention or belief, and

- c. The name and address of each person who has personal knowledge of any facts relating to the defendant's allegations, contentions or beliefs.
4. If it is the defendant's allegation, contention or belief that the plaintiff should have returned to work after recovering from any injury, disease or illness, please state:
  - a. The detailed factual basis for each of the defendant's allegations, contentions or beliefs,
  - b. A description of each of the defendant's sources of information for each allegation, contention or belief, and
  - c. The name and address of each person who has personal knowledge of any facts relating to the defendant's allegations, contentions or beliefs.
5. If it is the defendant's allegation, contention or belief that the plaintiff's medical costs and expenses are excessive for any injury, disease or illness which the plaintiff has, please state:
  - a. The detailed factual basis for each of the defendant's allegations, contentions or beliefs,
  - b. A description of each of the defendant's sources of information for each allegation, contention or belief, and
  - c. The name and address of each person who has personal knowledge of any facts relating to the defendant's allegations, contentions or beliefs.

Plaintiff Payee's Decrease in Income.

1. If it is the defendant's allegation, contention or belief that there has been an increase or lack of change in the plaintiff's income, please state:
  - a. The detailed factual basis for each of the defendant's allegations, contentions or beliefs,
  - b. A description of each of the defendant's sources of information for each allegation, contention or belief, and
  - c. The name and address of each person who has personal knowledge of any facts relating to the defendant's allegations, contentions or beliefs.
2. If it is the defendant's allegation, contention or belief that there has been an increase or lack of change in the plaintiff's income, please describe any increase or lack of change as to each source and amount of income, including, but without limitation:
  - a. Employment,
  - b. Free-lance contract work.
  - c. Investment income,
  - d. Sale or disposition of assets,
  - e. Inheritances or gifts,
  - f. Income from business, and
  - g. Other source and amount of income.

3. If it is the defendant's allegation, contention or belief that there has not been a decrease in the plaintiff's income, please state:
  - a. The detailed factual basis for each of the defendant's allegations, contentions or beliefs,
  - b. A description of each of the defendant's sources of information for each allegation, contention or belief, and
  - c. The name and address of each person who has personal knowledge of any facts relating to the defendant's allegations, contentions or beliefs.
4. If it is the defendant's allegation, contention or belief that there has not been a decrease in the plaintiff's income, please describe any increase or lack of change as to each source and amount of income, including, but without limitation:
  - a. Employment,
  - b. Free-lance contract work,
  - c. Investment income,
  - d. Sale or disposition of assets,
  - e. Inheritances or gifts,
  - f. Income from business, and
  - g. Other source and amount of income.

#### Majority Age Reached by Child.

1. Is it the defendant's contention, allegation or belief that (the child), having attained the age of majority, is old enough to be financially self-supporting?
2. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
  - a. The extent to which (the child) is now financially self-supporting,
  - b. The extent to which (the child) is living independently,
  - c. The effect of (the child's) marriage, and
  - d. The fact that (the child) has been financially self-supporting for a significant period of time.
3. Is it the defendant's contention, allegation or belief that (the child), having attained the age of majority, does not require financial support from the defendant to complete (the child's) education?
4. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
  - a. The other financial sources of support for more education such as stepparents, inheritance, ability to work, trust fund or other, and
  - b. The other sources of education funding such as scholarships, loans or grants.
5. Is it the defendant's contention, allegation or belief that (the child), having the age of majority, does not require financial support from the defendant as a result of any injury, disability or disease?

6. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
  - a. (the child) qualifies for state aid,
  - b. The injury, disability or disease is not substantially restrictive, and
  - c. (the child) currently has adequate medical coverage.
7. Is it the defendant's contention, allegation or belief that (the child), having attained the age of majority, does not require general financial support from the defendant?
8. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
  - a. (the child's) training for certain types of employment,
  - b. (the child's) capability for performing other types of employment, and
  - c. (the child's) various sources of general financial support such as inheritance, the plaintiff, stepparents, trust fund or other.

Extended Advanced Education of Child.

1. Is it the defendant's contention, allegation or belief that (the child) has the ability to finance the advanced education of (the child) without the financial support of the defendant?
2. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, including:
  - a. The decrease in (the child's) income from loss of job, business decline or change in employment circumstances,
  - b. (the child's) support requirements of another child,
  - c. Support requirements of (the child's) current spouse, and
  - d. Support requirements of (the child's) parent or other relative.
3. Is it the defendant's contention, allegation or belief that (the child) has no substantial need for financial support for advanced education due to other sources of support other than the defendant?
4. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, including:
  - a. Current ability to earn money,
  - b. Inheritance,
  - c. Trust fund,
  - d. Scholarship,
  - e. Loans,
  - f. Grants,
  - g. Stepparents, and
  - h. Other.

## Disability or Disease of Child.

1. Is it the defendant's contention, allegation or belief that (the child) does not require financial support, due to any injury, disability or disease, from the defendant?
2. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
  - a. The extent to which (the child) qualifies for governmental financial aid,
  - b. (the child's) injury, disability or disease is not substantially restrictive, and
  - c. (the child) currently has adequate medical coverage.
3. Is it the defendant's contention, allegation or belief that (the child) does not require general financial support?
4. If your answer to the preceding interrogatory is in the affirmative, please state in detail the factual basis for any such contention, allegation or belief, indicating:
  - a. (the child's) ability to work at employment for which (the child) was trained,
  - b. (the child's) ability to work at employment which (the child) is capable of performing, and
  - c. (the child's) other sources of financial support are sufficient, such as inheritance, trust fund, the plaintiff and stepparents.

CERTIFICATION IN LIEU OF OATH OR AFFIDAVIT

I hereby certify that the foregoing statements made by me in the attached answers to Interrogatories are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

\_\_\_\_\_  
Ronald Webber

DATED \_\_\_\_\_