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ATTORNEYS FOR  
Specially Appearing  
for Served Defendants

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ALAMEDA

	)	NO:
	)	
Plaintiff,	)	DEFENDANTS' STANDARD
	)	INTERROGATORIES TO
vs.	)	PLAINTIFF -- LOSS OF
	)	<u>CONSORTIUM</u>
FIREBOARD CORPORATION, et al.,	)	
	)	(Personal Injury)
Defendant.	)	
_____	)	

PROPOUNDED:	ON BEHALF OF DEFENDANTS
COORDINATING DEFENDANT:	Please contact _____ with any questions concerning these interrogatories, including exten- sions of time, etc.
RESPONDING PARTY:	
SET NUMBER:	PERSONAL INJURY II (PI II)
Mailed: _____	Plaintiff's Atty: _____
Due Date: _____	

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INTRODUCTION

Pursuant to Code of Civil Procedure Section 2030, defendants request plaintiffs to answer under oath the following interrogatories within 30 days.

INTERROGATORY NO. 1:

Please state:

- (a) Your name;
- (b) Your address; and
- (c) Whether you currently reside with your spouse.

ANSWER:

INTERROGATORY NO. 2:

Please state the date and place of your current marriage and the place of your current marriage.

ANSWER:

INTERROGATORY NO. 3:

Was your marriage ceremonial or common law?

- (a) If marriage was ceremonial, please state name, address, and official capacity of the person performing the marriage;
- (b) If marriage was common law, please outline the facts

1 and circumstances relied upon to establish the marriage.

2 ANSWER:

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6 INTERROGATORY NO. 4:

7 Do you and your spouse have any natural or adopted  
8 offspring? If so, please state:

9 (a) Names;

10 (b) Addresses;

11 (c) Dates of birth; and

12 (d) State whether natural or adopted.

13 ANSWER:

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17 INTERROGATORY NO. 5:

18 Have you had any previous marriages? If so, please state:

19 (a) Previous spouse's name;

20 (b) Previous spouse's address;

21 (c) Dates of marriage;

22 (d) Names and ages of children, whether natural or  
23 adopted; and

24 (e) Place, date, and circumstances under which the  
25 marriage was dissolved or terminated.

26 //

1 ANSWER:

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5 INTERROGATORY NO. 6:

6 Has your spouse had any previous marriages? If so,  
7 please state:

8 (a) Previous spouse's name;

9 (b) Previous spouse's address;

10 (c) Dates of marriage;

11 (d) Names and ages of children, whether natural or  
12 adopted; and

13 (e) Place, date, and circumstances under which the  
14 marriage was dissolved or terminated.

15 ANSWER:

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20 INTERROGATORY NO. 7:

21 On the average, how many hours per day did you spend with  
22 your spouse prior to his/her current illness?

23 ANSWER:

1 INTERROGATORY NO. 8:

2 On the average, how many hours per day do you currently  
3 spend with your spouse?

4 ANSWER:

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7 INTERROGATORY NO. 9:

8 What hobbies, sports, games, cultural, vocational and  
9 other interests did you share with or enjoy in common with your  
10 spouse prior to his/her current illness?

11 ANSWER:

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14 INTERROGATORY NO. 10:

15 Have you ever been legally separated from your spouse?  
16 If so, please state the circumstances, duration, and dates of  
17 each such separation.

18 ANSWER:

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22 INTERROGATORY NO. 11:

23 Have you ever been voluntarily separated from your spouse  
24 for reasons due to differences or disputes arising out of the  
25 marital relationship? If so, please state the circumstances  
26 and duration of each such separation.

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ANSWER:

INTERROGATORY NO. 12:

Within the last ten (10) years, have you or your spouse ever filed a civil complaint with any governmental agency against the other for physical abuse? If so, please state:

- (a) The person initiating the procedure;
- (b) A description of the complaint, charge or grievance;
- (c) The court or governmental body before which the proceeding was brought; and
- (d) The disposition of the proceedings.

ANSWER:

INTERROGATORY NO. 13:

Within the last ten (10) years, have you or your spouse ever filed a criminal complaint with any governmental agency against the other for physical abuse? If so, please state:

- (a) The person initiating the procedure;
- (b) A description of the complaint, charge or grievance;
- (c) The court or governmental body before which the proceeding was brought; and
- (d) The disposition of the proceedings.

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ANSWER:

INTERROGATORY NO. 14:

Have you ever seen or consulted with any therapist or counselor or professional about sexual dysfunction or sexual incompatibility in your marriage with your spouse? If so, please state the dates, the names of the parties seen, and the circumstances of each such visit or consultation.

ANSWER:

INTERROGATORY NO. 15:

Please state the name, address, telephone number of every person who assisted you in any way in answering these interrogatories.

ANSWER:

Date: \_\_\_\_\_, 1986

FISHER & HURST

By \_\_\_\_\_