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**SUPERIOR COURT, STATE OF WASHINGTON**  
\_\_\_\_\_ **COUNTY**

In re the Marriage of:  
\_\_\_\_\_,  
Petitioner,  
and  
\_\_\_\_\_,  
Respondent

No.  
**FIRST INTERROGATORIES AND  
REQUESTS FOR PRODUCTION**

ASKING PARTY: \_\_\_\_\_

ANSWERING PARTY: \_\_\_\_\_

ATTORNEY FOR ANSWERING  
PARTY, IF ANY: \_\_\_\_\_

**INSTRUCTIONS TO BOTH PARTIES**

These interrogatories are intended to provide for the exchange of relevant information without unreasonable expense to the answering party. They do not change existing law relating to interrogatories. They do not affect the answering party's right to assert any privilege or make any objection. Privileges must be asserted.

1 If asked to IDENTIFY A PERSON, give the person's name, last known home and business  
2 address, phone numbers, and company affiliation at the date of the transaction referred to.

3 If asked to IDENTIFY A DOCUMENT, attach a copy of the document, unless you explain  
4 why not. If you do not attach the copy, describe the document, including its date and nature. Give the  
5 name, address, phone number, and occupation of the person who has the document.

### 6 DEFINITIONS

7 PERSON includes a natural person, partnership, any kind of business, legal, or public entity,  
8 and its agents or employees.

9 DOCUMENT means all written, electronic, recorded, or graphic materials, however stored,  
10 produced, or reproduced.

11 ASSET or PROPERTY includes any interest in real or personal property. It also includes, but  
12 is not limited to, any interest in a pension, profit-sharing, or retirement plan, whether vested or not, as  
13 well as bank accounts, credit union accounts, brokerage accounts, stocks, bonds, mutual funds, or any  
14 other rights or claims.

15 DEBT means any obligation, including debts paid since the date of separation.

16 INCOME means money from any source, whether wages, self-employment, dividends,  
17 interest, capital gains, support, state aid or otherwise.

18 SUPPORT means any benefit or economic contribution to the living expenses of another  
19 person, including gifts.

20 You must answer these interrogatories under oath within 30 days, in accordance with Court  
21 Rule 33 and 34. YOU HAVE A CONTINUING DUTY TO SUPPLY UPDATED INFORMATION  
22 AS SOON AS YOU RECEIVE IT.



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5. **Support Provided to Others.** State the name, age, address, and relationship to you of each person for whom you have provided support during the past 12 months and the amount you provided per month for each.

6. **Support Received for Others.** State the name, age, address, and relationship to you of each person for whom you have received support during the past twelve months, the amount you received per month for each person and the source of the support.

7. **Current Income.** Identify all income you have received during the past 12 months, its source, the total amount received from each source and the information you used to answer this question. Attach your last three paycheck stubs.

8. **Other income.** During the past three (3) years, have you received cash, compensation or other property from any source other than those identified in question 7? If so, list the type of property, the date received, the source and the value of the property. Attach copies of all documents supporting your answers.

9. **Tax Returns.** Attach copies of all tax returns, including W-2 and 1099 forms as well as supporting schedules, filed either by you or for you in the past 36 months.

10. **Tax Preparers and Accountants.** Has anyone in the past three years provided you, or any business or partnership in which you have more than 1% ownership, any tax or financial advice, accounting service or bookkeeping service? If yes, state the name, address and phone number of each person or institution, the type of service provided and the dates of such service.

11. **Schedule of Assets and Debts.** Complete the Schedule of Assets and Debts served with these interrogatories.

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**12. Separate Property or Debts.** Identify each property or debt you admit or claim is the separate asset or debt of either you or your spouse and state all the supporting facts.

**13. Property Values.** During the past 24 months, have there been any appraisals or offers to buy any of the assets listed in your Schedule of Assets and Debts? If yes, identify the asset and state the amount and source of the appraisal or offer. Attach a copy of each appraisal or offer.

**14. Property Held by Others.** Is there any property held by anyone but you or your spouse in which either of you holds any interest or control? If yes, state if the property is shown on the Schedule of Assets and Debts completed by you. If not, describe and identify each such asset and state its present value and the basis for your valuation, and identify the person holding the asset.

**15. Retirement and Other Benefits.** Do you have an interest in any disability, retirement, profit sharing, or deferred compensation plans? If your answer is yes, state the name and value of each plan and the name, address, and phone number of the administrator and custodian of records.

**16. Claims of Reimbursement.** Do you claim the right to be reimbursed by your spouse for any expenditures of your separate or community property? If your answer is yes, state the claim and all the supporting facts.

**17. Credits for Reimbursement.** Do you claim reimbursement credits for payments made by you on community debts since the date of separation? If yes, identify the creditor and state the date of the payments, the amount paid, the source of funds used to make the payments and any amounts you have added to the debt since the separation from your spouse.

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18. **Insurance.** Identify each health, life, automobile, and disability insurance policy or plan that you now own or that covers you, your children, or your assets. State the insurance company, policy type, policy number and the insurance agent’s name, address and phone number.

19. **Health.** Is there any physical or emotional condition that limits your ability to work or provide parental care for a child? If yes, identify each such condition and state all the supporting facts.

20. **Children’s Special Needs.** Do your children have any special needs? If yes, identify the child, the special need, its cost and its expected duration. Identify any professionals who have knowledge of your child’s special needs.

21. **Gifts.** State any gifts you have made in the past 24 months, their value, and the recipients.

22. **Children.** State your preferences regarding the residential schedule with your children or attach your proposed parenting plan.

CERTIFICATE OF FORWARDING

I dated and forwarded the foregoing Interrogatories and Request for Production are dated by mail or messenger to the opposing party on \_\_\_\_\_.

\_\_\_\_\_  
Asking party or their attorney

VERIFICATION OF ANSWERS TO INTERROGATORIES

1 I declare under penalty of perjury under the laws of the State of Washington that 1) I am the person to  
2 whom these interrogatories are addressed. 2) I have read the foregoing answers to the interrogatories. I  
3 know the contents thereof. 3) The foregoing answers to the interrogatories and responses to requests  
4 for production of documents are true, correct and complete.

5 \_\_\_\_\_  
Date

\_\_\_\_\_   
Answering party (not their attorney)

6 CERTIFICATION OF COMPLIANCE AND FORWARDING

7 I hereby certify that I have read the foregoing Answers to Interrogatories and Responses to Request  
8 for Production. I certify that they are in compliance with CR 26(g)(1, 2 & 3) and that the original of  
9 the Answers to Interrogatories and Responses to Request for Production have been forwarded by mail  
10 or messenger on the date stated below to the Asking Party.

11 \_\_\_\_\_  
Date

\_\_\_\_\_   
Answering party or their attorney