

**IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DU PAGE COUNTY – WHEATON, ILLINOIS**

IN RE THE MARRIAGE OF:

XXXX XXXXX,

Petitioner,

and

XXXX XXXXX,

Respondent.

Case No. 20XX D XXXX

INTERROGATORIES TO BE ANSWERED BY RESPONDENT
PURSUANT TO ILLINOIS SUPREME COURT RULE 213

PLEASE TAKE NOTICE that Petitioner, _____ by and through his attorneys, KULERSKI & CORNELISON and pursuant to Illinois Supreme Court Rule 213, hereby propounds the following Interrogatories to Respondent, _____, and requests that she answer said Interrogatories in writing under oath.

Please take notice that a copy of such Answers to said Interrogatories should be served on the offices of KULERSKI & CORNELISON, 1s660 Midwest Road, Suite 320, Oakbrook Terrace, Illinois 60181, on or before 28 days from the date of mailing of these Interrogatories.

Pursuant to Illinois Supreme Court Rule 213, all of these Interrogatories shall be deemed continuing in nature so as to require supplemental or amended answers if new or additional information subsequently becomes known to her or his attorney(s).

1. State your full name, current address, date of birth and social security number.
2. List all employment held by you during the preceding three years and with regard to each employment state:
 - (a) The name and address of each employer;
 - (b) Your position, job title or description;
 - (c) If you had an employment contract;
 - (d) The date on which you commenced your employment and, if applicable, the date and reason for the termination of your employment;
 - (e) Your current gross and net income per pay period;
 - (f) Your gross income as shown on the last W-2 tax and wage statement received by you, your social security wages as shown on the last W-2 tax and wage statement received by you, and the amount of all deductions shown thereon; and

(g) All additional benefits or perquisites received from your employment stating the type and value thereof.

3. During the preceding three years, have you had any source of income other than from your employment listed above? If so, with regard to each source of income, state the following:

(a) The source of income, including the type of income and name and address of the source;

(b) The frequency in which you receive income from the source;

(c) The amount of income received by you from the source during the immediately preceding three years; and

(d) The amount of income received by you from the source for each month during the immediately preceding three years.

4. Do you own any interest in real estate? If so, with regard to each such interest state the following:

(a) The size and description of the parcel of real estate, including improvements thereon;

(b) The name, address and interest of each person who has or claims to have an ownership interest in the parcel of real estate;

(c) The date your interest in the parcel of real estate was acquired;

(d) The consideration you transferred or paid for your interest in the parcel of real estate;

(e) Your estimate of the current fair market value of the parcel of real estate and your interest therein; and

(f) The amount of any indebtedness owed on the parcel of real estate and to whom.

5. For the preceding three years, list the names and addresses of all associations, partnerships, corporations, enterprises or entities in which you have an interest or claim any interest, the nature of your interest or claim of interest therein, and an estimate of the value of your interest therein.

6. During the preceding three years, have you had any account or investment in any type of financial institution, individually or with another or in the name of another, including checking accounts, savings accounts, certificates of deposit and money market accounts? If so, with regard to each such account or investment, state the following:

(a) The type of account or investment;

(b) The name and address of the financial institution;

(c) The name and address of each person in whose name the account is held; and

(d) Both the high and the low balance of the account or investment, stating the date of the high balance and the date of the low balance.

7. During the preceding three years, have you been the holder of or had access to any safety deposit boxes? If so, state the following:

(a) The name of the bank or institution where such box is located;

(b) The number of each box;

(c) A description of the contents of each box during the immediately preceding three years and as of the date of the answer; and

(d) The name and address of any joint or co-owners of the safety deposit box or any trustees holding the box for your benefit.

8. During the immediately preceding three years, has any person or entity held cash or property on your behalf? If so, state:

(a) The name and address of the person or entity holding the cash or property; and

(b) The type of cash or property held and the value thereof.

9. During the preceding three years, have you owned any stock, bonds, securities or other investments, including savings bonds? If so, with regard to each such stock, bond, security, or investment state:

(a) A description of the stock, bond, security or investment;

(b) The name and address of the entity issuing the stock, bond, security or investment;

(c) The present value of the stock, bond, security or investment;

(d) The date of acquisition of the stock, bond, security or investment;

(e) The cost of the stock, bond, security or investment;

(f) The name and address of any other owner or owners in such stock, bond, security or investment; and

(g) If applicable, the date sold and the amount realized therefrom.

10. Do you own or have any incidents of ownership in any life, annuity or endowment insurance policies? If so, with regard to each such policy state:

(a) The name of the company;

(b) The number of the policy;

(c) The face value of the policy;

(d) The present value of the policy;

- (e) The amount of any loan or encumbrance on the policy;
- (f) The date of acquisition of the policy; and
- (g) With regard to each policy, the beneficiary or beneficiaries.

11. Do you have any right, title, claim or interest in or to a pension plan, retirement plan or profit sharing plan, including, but not limited to, individual retirement accounts, 401(k) plans and deferred compensation plans? If so, with regard to each such plan state:

- (a) The name and address of the entity providing the plan;
- (b) The date of your initial participation in the plan; and
- (c) The amount of funds currently held on your behalf under the plan.

12. Do you have any outstanding indebtedness or financial obligations, including mortgages, promissory notes, or other oral or written contracts? If so, with regard to each obligation state the following:

- (a) The name and address of the creditor;
- (b) The form of the obligation;
- (c) The date the obligation was initially incurred;
- (d) The amount of the original obligation;
- (e) The purpose or consideration for which the obligation was incurred;
- (f) A description of any security connected with the obligation;
- (g) The rate of interest on the obligation;
- (h) The present unpaid balance of the obligation;
- (i) The dates and amounts of installment payments; and
- (j) The date of maturity of the obligation.

13. Are you owed any money or property? If so, state:

- (a) The name and address of the debtor;
- (b) The form of the obligation;
- (c) The date the obligation was initially incurred;
- (d) The amount of the original obligation;
- (e) The purpose or the consideration for which the obligation was incurred;
- (f) The description of any security connected with the obligation;
- (g) The rate of interest on the obligation;

- (h) The present unpaid balance of the obligation;
- (i) The dates and amount of installment payments; and
- (j) The date of maturity of the obligation.

14. State the year, make and model of each motor or motorized vehicle, motor or mobile home and farm machinery or equipment in which you have an ownership, estate, interest or claim of interest, whether individually or with another, and with regard to each item state:

- (a) The date the item was acquired;
- (b) The consideration paid for the item;
- (c) The name and address of each other person who has a right, title, claim or interest in or to the item;
- (d) The approximate fair market value of the item; and
- (e) The amount of any indebtedness on the item and the name and address of the creditor.

15. Have you purchased or contributed toward the payment for or provided other consideration or improvement with regard to any real estate, motorized vehicle, financial account or securities, or other property, real or personal, on behalf of another person or entity during the preceding three years. If so, with regard to each such transaction state:

- (a) The name and address of the person or entity to whom you contributed;
- (b) The type of contribution made by you;
- (c) The type of property to which the contribution was made;
- (d) The location of the property to which the contribution was made;
- (e) Whether there is written evidence of the existence of a loan; and
- (f) A description of any written evidence.

16. During the preceding three years, have you made any gift of cash or property, real or personal, to any person or entity? If so, with regard to each such transaction state:

- (a) A description of the gift;
- (b) The value of the gift;
- (c) The date of the gift;
- (d) The name and address of the person or entity receiving the gift;
- (e) Whether there is written evidence of the existence of a gift; and

(f) A description of any written evidence.

17. During the preceding three years, have you made any loans to any person or entity and, if so, with regard to each such loan state:

- (a) A description of the loan;
- (b) The value of the loan;
- (c) The date of the loan;
- (d) The name and address of the person or entity receiving the loan;
- (e) Whether there is written evidence of the existence of a loan; and
- (f) A description of any written evidence.

18. During the preceding three years, have you sold, transferred, conveyed, encumbered, concealed, damaged or otherwise disposed of any property owned by you whether individually or with another? If so, with regard to each item of property state:

- (a) A description of the property;
- (b) The current location of the property;
- (c) The purpose or reason for the action taken by you with regard to the property;
- (d) The approximate fair market value of the property;
- (e) Whether there is written evidence of any such transaction; and
- (f) A description of any written evidence.

19. During the preceding three years, have any appraisals been made with regard to any of the property listed by you under your answers to these interrogatories? If so, state:

- (a) The name and address of the person conducting each such appraisal;
- (b) A description of the property appraised;
- (c) The date of the appraisal; and
- (d) The location of any copies of each such appraisal.

20. During the preceding three years, have you prepared or has anyone prepared for you any financial statements, net worth statements or lists of assets and liabilities pertaining to your property or financial affairs? If so, with regard to each such document state:

- (a) The name and address of the person preparing the document;
- (b) The type of document prepared;
- (c) The date the document was prepared; and

(d) The location of all copies of the document.

21. State the name and address of any accountant, tax preparer, bookkeeper and other person, firm or entity who has kept or prepared books, documents and records with regard to your income, property, business or financial affairs during the course of this marriage.

22. List all non-marital property claimed by you, identifying each item of property as to the type of property, the date received, the basis on which you claim it is non-marital property, its location, and the present value of the property.

23. List all marital property of this marriage, identifying each item of property as to the type of property, the basis on which you claim it to be marital property, its location, and the present value of the property.

24. What contribution or dissipation has your spouse made to the marital estate, including but not limited to each of the items or property identified in response to interrogatories No. 22 and No. 23 above, citing specifics, if any, for each item of property?

25. Pursuant to Illinois Supreme Court Rule 213(f), provide the name and address of each witness who will testify at trial and state the subject of each witness' testimony.

26. Pursuant to Illinois Supreme Court Rule 213(g), provide the name and address of each opinion witness who will offer any testimony and state:

(a) The subject matter on which the opinion witness is expected to testify;

(b) The conclusions and/or opinions of the opinion witness and the basis therefore; including reports of the witness, if any;

(c) The qualifications of each opinion witness, including a *curriculum vitae* and/or resume, if any; and

(d) The identity of any written reports of the opinion witness regarding this occurrence.

27. Are you in any manner incapacitated or limited in your ability to earn income at the present time? If so, define and describe such incapacity or limitation, and state when such incapacity or limitation commenced and when it is expected to end. Please list the name and address of any physician who has been involved in the treatment of any such limitation or incapacitation.

28. Identify any statements, information and/or documents known to you and requested by any of the foregoing interrogatories which you claim to be work product or subject to any common law or statutory privilege, and with respect to each interrogatory, specify the legal basis for the claim as required by Illinois Supreme Court Rule 201(n).

ATTESTATION

MARIA J. WIBERT, being first duly sworn on oath, deposes and states that she has read the foregoing document, and the answers made herein are true, correct and complete to the best of her knowledge and belief.

XXXX XXXXX

SUBSCRIBED TO AND SWORN before me
this ____ day of _____, 2019.

Notary Public

KULERSKI & CORNELISON - #23415
Attorney for Petitioner
1s660 Midwest Road, Suite 320
Oakbrook Terrace, Illinois 60181
(630) 928-0600
staff@illinoislegal.com