

IN THE SUPERIOR COURT OF FORSYTH COUNTY

STATE OF GEORGIA

ELIZABETH ANDERSON,

Plaintiff,

v.

JOHNNY ANDERSON,

Defendant.

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Civil Action

File No. 20CV-4321-1

DEFENDANT'S FIRST AND CONTINUING INTERROGATORIES TO PLAINTIFF

COMES NOW, the Defendant Johnny Anderson, and hereby serves the within and foregoing Interrogatories upon the Plaintiff pursuant to O.C.G.A. § 9-11-33, and requires that Plaintiff answer under oath the following Interrogatories within the time provided by law, and that the original of said answers be furnished to Defendant's attorneys at 213 Kelly Mill Rd., Cumming, GA 30040.

Each Interrogatory is addressed to the knowledge of said opposing party, as well as to the knowledge and information of said opposing party's counsel, investigators, agents, employees, and other representatives. When a question is directed to said opposing party, the question is also directed to the aforementioned persons.

Each Interrogatory shall be answered separately and fully in writing under oath. The answers are to be signed by the person making them, and the objections signed by the attorney making them.

The party upon whom these Interrogatories have been served shall serve a copy of the answers and objections, if any, within the time as provided by law. Failure to respond in a timely manner may subject said party to sanctions pursuant to O.C.G.A. § 9-11-37.

These Interrogatories shall be deemed to be continuing so as to require supplemental answers if said opposing party and/or his attorney obtains further information between the time the answers are served and the time of trial. Any such supplemental answers are to be filed and served upon counsel for the Plaintiff immediately upon receipt of such additional information, but not later than fifteen (15) days prior to trial.

1.

List any and all sources of income and other compensation to you from January 1, 2015, to date, and indicate the total amount of gross income and net income received by you from each source.

2.

Describe your current employment, if any, including the name and address of your current employer, your job title, job description, and compensation structure. Include your job duties and your typical work hours.

3.

Are you entitled to participate in any type of incentive compensation plan in connection with your employment? If so, identify the plan and describe the benefits you receive or may be entitled to receive under the plan.

4.

Please list and identify all stocks and securities of any type in which you currently have any claim or interest.

5.

Please list and identify any bonds and debentures of any type in which you have any claim or interest.

6.

Please list and identify all real estate in which you currently have any claim or interest or intend to have an interest or claim any time within the next two years.

7.

Please list and identify all automobiles in which you currently have any claim or interest, including any and all vehicles used by you or anyone else who works for you in your course of employment or business.

8.

Identify every trust, partnership, limited partnership, corporation and/or “dba” (doing business as) in which you hold an interest of any type, and include the nature and value of said interest.

9.

Does any person, firm or business hold any property for your benefit which is not otherwise disclosed in your answers to these Interrogatories? If so, please state:

- (a) The name and address of the person, firm or business holding said property;
- (b) A general description of said property; and
- (c) The fair market value of said property.

10.

Please list all property, real or personal, that you contend is your separate property. For each item of property, state how such property was acquired, the present fair market value of such property, the fair market value of such property at the time of acquisition, and any improvements that have been made to such property.

11.

List any property, real or personal, that you are holding for the benefit of another in trust or otherwise. For each item, please state the name and address of the beneficial owner, a description of the property, the conditions surrounding your holding of the property, and the value of the property.

12.

List any and all transfers of money or property, both real and personal, exceeding a value of \$500 which you have made to any individual or legal entity since January 1, 2015, describing the property transferred, the date of said transfer, to whom said property was transferred, the consideration paid by said transferee, if any, and the consideration paid by you at the time of acquisition of the property.

13.

Please list the contents of any safe deposit box(es) or safes which you maintain, giving the exact location thereof.

14.

Identify by name of the holding institution, account name, account number, and current value each and every bank checking, savings, money market, or investment account maintained by you jointly or individually with any bank, savings and loan association, stock broker or other financial institution for the past five years, including any funds, accounts, stocks or investment articles in which you have a beneficial interest including, without limitation, any account held in your name for the benefit of any other individual.

15.

Identify each and every credit card which you were or are authorized to make charges

against within the last five years and with regard to each, provide the name of the card, the names of all individuals authorized to use the card, the account number, the effective date and expiration date of the card, and the address to which payment is made.

16.

With respect to any retirement plan, deferred compensation plan, pension or profit sharing plan, stock option plan, individual retirement account, or any other plan in which you have, or may have the right to receive income at any time in the future, please state the following:

- (a) Name, principal location and administrator of the plan;
- (b) Date you first acquired an interest in the plan;
- (c) The total value of your interest in the plan;
- (d) The extent to which the plan is vested or unvested; and
- (e) The date on which you will become eligible to receive benefits from the plan.

17.

Please list all items of value over \$500 that you have purchased since the date of your separation.

18.

Please identify any amount of cash that you have in your possession.

19.

Please list all financial institutions where you have applied for a loan, mortgage, or line of credit in the past five (5) years, regardless of whether your application was accepted.

20.

List all policies of life insurance, including retirement or endowment policies which name you as the principal insured. For each policy, please state the insurance carrier, the date of issue,

the face amount of the policy, the named beneficiary and whether the beneficiary designation is revocable, the annual premium, the person or business entity making payments, and the cash or surrender value, if any.

21.

List all medical, dental, vision, prescription drug or disability insurance policies that insure you, individually and/or jointly with any other person or persons. For each policy, please state the insurance carrier, the date of issue, the annual premium, and the person or business entity making payments, and the cost.

22.

List all debts, mortgages, and other liabilities owed by you individually or jointly with another. With respect to each and every debt, liability, mortgage, or encumbrance owed by you to another, whether individually or jointly, please state:

- (a) The amount owed;
- (b) To whom the amount is owed, including the account number; and
- (c) Whether said debt is in joint names or in your name only.

23.

Please state to the best of your knowledge, whether there are any tax liabilities due and unpaid by either you or your spouse. If your answer is affirmative, state the amount due, the date due, the reason for non-payment and the person responsible for payment.

24.

Please identify all persons whom you know or believe to have knowledge of the following issues or areas of fact in this action:

- (a) The causes of the separation;

- (b) The conduct of the parties that is relevant to this divorce action;
- (c) Your and/or your spouse's earnings and earning capacity; and
- (d) The assets and value of the assets accumulated during the marriage.

25.

Please identify any and all expert witnesses you propose to present at any hearing or final trial in the above case, indicating, for each such witness, his or her full name, complete address, and telephone number, as well as all of the information which you are required to give pursuant to O.C.G.A. § 9-11-26(b)(4)(A)(i), which includes information as to the subject matter on which this witness is expected to testify, the substance of the facts and opinions to which each such witness is expected to testify, and a list of all reports letters or documents which said witness has provided for you.

26.

Please identify any and all witnesses you propose to present at any hearing or final trial in the above case, including for each such witness, his or her full name complete address and telephone number and the topic upon which the witness is expected to testify.

27.

Please identify each item of documentary, physical, tangible or demonstrative evidence, including, but not limited to, photographs, audio recordings, video recordings, letters, notes, memoranda and reports supporting or tending to support any claims or defenses which you raise in this litigation.

28.

Please describe any complaints you have about your spouse as a parent.

29.

Please describe what you believe is an appropriate parenting plan for the minor child.

30.

Please describe any complaints you have about your spouse as a Husband.

31.

Please describe with specificity any and all specific Adjustments, Deviations, and/or Credits that you contend should be accounted for on the child support worksheets and/or for child support purposes in this action, including providing a description of the expense, and the amount of the contended expense.

For purposes of clarity, this request shall include without limitation identifying any of the following expenses you contend you have or will incur for any minor child: *Work Related Child Care* costs (e.g., daycare, afterschool care, summer care; etc.); *Insurance Premiums* allegedly paid by you for ant minor children; *Extra-Curricular activity* expenses; *Educational* expenses; and/or any other potential adjustments or deviations listed under Schedules B, D or E of the Child Support Worksheets.

32.

Do you believe that you are entitled to alimony? Please state all facts that support or deny this claim and identify all documents and other tangible evidence you rely upon to support your claim.

33.

Please identify all persons other than the Defendant since the date of your marriage through the date of trial of the pending matter, with whom you have been engaged in any act or acts of sexual intercourse, cunnilingus, fellatio, or any other sexual contact, stating the dates and

geographical address of any such conduct or contact, together with a full description of each such act or acts as identified by you.

34.

Please state whether you have supplied pictures of your genitals to any person other than the Defendant since the date of your marriage through the date of the trial of the pending matter.

35.

Please identify the retainer amount, any additional amounts paid, and the method by which you have compensated your attorney such as check, cash or credit card and identify the account from which said funds were paid.

This _____ day of _____, 2021.

Patterson Moore Butler, LLC
Attorney for Defendant

Jennifer D. Patterson
Georgia Bar No. 566519

213 Kelly Mill Rd.
Cumming, Georgia 30040
(770) 889-0846
jpatterson@pattersonmoorebutler.com

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CERTIFICATE OF SERVICE

I hereby certify that I have served upon the Plaintiff (or counsel thereof) the foregoing *Defendant's First and Continuing Interrogatories to Plaintiff*, by certified United States mail with sufficient postage attached thereon to ensure proper delivery, and by e-mail, addressed as follows:

Jane Smith

The Law Office of Jane Smith
432 Statute Drive
Cumming, Georgia 30040
janesmith@aol.com

This ____ day of _____, 2021.

PATTERSON MOORE BUTLER, LLC

Attorney for Defendant

Jennifer D. Patterson

Georgia Bar No. 566519

213 Kelly Mill Rd.

Cumming, Georgia 30040

(770) 889-0846

jpatterson@pattersonmoorebutler.com