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Attorney for Petitioner

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE**

**CENTRAL JUSTICE CENTER**

YYYYYYYYYYY,	)	Case No.: 99999999999999999999
	)	
	)	
	)	
vs.	)	<b>PETITIONER YYYYYYYY'S FIRST SET</b>
	)	<b>OF SPECIAL INTERROGATORIES TO</b>
XXXXXXXXXXX,	)	<b>RESPONDENT XXXXXXXXXXXX.</b>
	)	
	)	
	)	
	)	
	)	
	)	
	)	
	)	
	)	

Propounding Party: YYYYYYYYYYYYYYYY

Responding Party: XXXXXXXXXXXXXXXX

Set Number: One [SET #2 WOULD BEGIN WITH QUESTION #9]

**[INSTRUCTIONS ARE NO LONGER PROPER ALTHOUGH COMMON AND MIGHT BE HELPFUL]**

To Plaintiff and to his attorney:

Defendant, Jane Doe, requests that Plaintiff, John Smith, respond to the following interrogatories separately and fully in writing and under oath, pursuant to Section 2030 of the Code of Civil Procedure, and that the response be signed by the person making them and be served on Defendant, Jane Doe, within 30 days after service of these interrogatories.

In answering these interrogatories, furnish all information that is available to you. If you cannot answer an interrogatory completely, answer it to the extent possible. If you do not have personal knowledge sufficient to respond fully to an interrogatory, so state, but make a reasonable and good faith effort to obtain the information by inquiry to other natural persons or

organizations, unless the information is equally available to the asking party, pursuant to Section 2030.210 of the Code of Civil Procedure.

Interrogatory No. 1:

Is it your contention that since April, 199X the circumstances relating to custody of the minor children have changed? **(Why is this a wasted question?)**

Interrogatory No. 2:

State each and every fact upon which you base your contention that there has been a change of circumstances.

Interrogatory No. 3:

IDENTIFY each person who has knowledge of the facts upon which you base your contention that there has been a change of circumstances. (IDENTIFY means provide the name, address and telephone number.) **[DEFINE WORDS IN CAPS AND DEFINED IN EACH INTERROGATORY. IT IS COMMON TO HAVE SET DEFINITIONS]**

Interrogatory No. 4:

DESCRIBE each document, if any, which you believe supports a change of circumstances. (DESCRIBE means to provide the author, signatory, date, number of pages, subject matter and any other distinguishing feature.

Interrogatory No. 5:

IDENTIFY each person you intended to call as a witness on your behalf in the present proceeding. (IDENTIFY means to provide the name, address and telephone number.)

Interrogatory No. 6:

State the substance of the testimony of each proposed witness you identified in response to interrogatory #5.

//// [These let the reader know that there are more pages.]

Interrogatory No. 7:

What is the relationship to you of each person you have identified as a witness in the present proceeding?

Interrogatory No. 8:

State the date on which you retained counsel LLLLLLLLLLLLLLLLLL as your attorney for the present proceeding.

Dated this 6<sup>th</sup> day of November, 2011

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WILLIAM T. TANNER  
Attorney for Petitioner

**[SERVE A COPY OF THE SPECIAL INTERROGATORIES W/P.O.S. AND KEEP THE ORIGINAL OF BOTH. YOU WILL NEED TO FILE THE ORIGINALS WITH THE COURT IN CASE YOU NEED TO FILE A MOTION TO COMPEL.]**