

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
FAMILY LAW DIVISION**

IN RE OF:

**CASE NO.:
DIVISION:**

and

_____ /

NOTICE OF SERVICE OF FIRST SET OF CHILD CUSTODY INTERROGATORIES

TO:

The _____, by and through the undersigned counsel, pursuant to Rule 1.340 of the Florida Rules of Civil Procedure, hereby propounds upon the _____, Interrogatories numbered one (1) through two (2), answers to which will be due within thirty (30) days from the date of service.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the _____, a true and correct copy of the foregoing was mailed, faxed, or hand delivered: _____

_____.

NILO J. SANCHEZ, JR., ESQUIRE
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**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
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FAMILY LAW DIVISION**

IN RE OF:

**CASE NO.:
DIVISION:**

and

_____ /

I, _____, being sworn, certify that the following information is true:

1. PRIOR HISTORY:

a. State the addresses of your residences for the past five (5) years, and identify the dates that you resided at those addresses.

b. State the names and addresses of each and every doctor, health care provider, as well as all psychologist, psychiatrist, and counselor which you have seen in the past three (3) years, and the purpose of those visits.

c. State whether or not you have ever been arrested or convicted of any crime within the last ten (10) years. Include the date of the arrest, state and county where arrest occurred, and nature of offense.

2. CURRENT AND FUTURE PLANS:

a. State any plans which you may have for the relocation of yourself and/or your family. Include within your response the anticipated location of your relocation.

b. State your current visitation schedule, and whether such schedule is court ordered or privately stipulated to between you and the other parent of the minor child.

c. State the current child support arrangements citing the dollar amount and frequency of payments.

d. State the names and addresses of every person known by you, or whom you believe has any knowledge in regard to these child's majority time-sharing matters. Please specify in detail the knowledge that you believe each person would have.

e. State what you consider to be the best custodial arrangement for your child and state your rationale.

f. Have the child expressed a preference to live with you? If so, please state the date of and circumstances regarding the expression of the preference, including the words used by the child.

g. State the address where you and the child would reside if you were granted majority time-sharing and describe with specificity the child's proposed living quarters.

h. Would you be able to devote yourself full time to the child's care and upbringing if you were granted majority time-sharing? If not, state:

1) What portion of the day do you intend to spend with the child?

2) The reason you cannot devote yourself full time to the child's care?

3) How do you intend to provide for the child's care when you are not available? Please cite the name and address of the person/institution which will be caring for the child.

i. State whether you and the other parent have any major disagreements regarding the child's education, religious upbringing, discipline, health care needs, and/or extra curricular activities. If so please cite the nature of these disagreements and each party's position as you perceive it.

j. List the names, addresses, and telephone number of each person who has knowledge of the relevant facts concerning the issues of time-sharing and visitation involved in this case, and for each state the nature of such knowledge.

k.. Do you believe there is anything about the other parent that renders her unfit to have physical majority time-sharing of the child? If so, please describe with specificity.

l. Are you currently taking any medication? If so, list each medication, the dates on which you have taken the medication and the purpose.

m. State with specificity what you consider to be the other parent's greatest weaknesses as a parent.

I understand that I am swearing or affirming under oath to the truthfulness of the answers to these interrogatories and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

DATED: _____

The foregoing instrument was acknowledged before me this ____ day of _____, 2013, by _____, who is personally known to me or who has produced Florida Identification # _____ as identification and who did/did not take an oath.

NOTARY PUBLIC, STATE OF FLORIDA

(SEAL)