

[REDACTED]

Attorney for Defendant

[REDACTED],

Plaintiff,

v.

[REDACTED],

Defendant.

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION – FAMILY PART
: [REDACTED] COUNTY
: DOCKET NO [REDACTED]

: CIVIL ACTION

: **DEFENDANT’S ANSWERS TO
: PLAINTIFF’S CUSTODY
: INTERROGATORIES**

TO:

[REDACTED]

Attorneys for Plaintiff

COUNSEL:

Defendant, [REDACTED], hereby objects and responds to Plaintiff’s Interrogatories, as set forth below. The responses reflect Defendant’s present knowledge and Defendant’s best efforts to identify the information and documents responsive to those requests. Defendant’s efforts are continuing, however, and Defendant reserves the right to amend or supplement the responses and objections herein as may be necessary or appropriate in the future.

[REDACTED]
Attorneys for Defendant

BY: _____
[REDACTED]

Dated: _____

OBJECTIONS

The following objections apply to and are incorporated in each individual response herein, whether or not expressly incorporated by reference in such response. The failure to specify any General Objections OR Specific Objections in responding and/or objecting to a particular response is not intended to waive any said objections as to that response.

GENERAL OBJECTIONS

1. Defendant reserves all objections at any hearing or trial or on any motion to the use or admissibility of any information, material or documents identified or disclosed. The identification or disclosure of any information, material or documents does not constitute an admission by Defendant that such information, material or documents are relevant to the action or admissible in evidence.

2. Defendant objects to the requests to the extent that they call for the production of attorney work-product and/or materials subject to the attorney-client privilege. Inadvertent reliance on or disclosure of any information, material or documents subject to the attorney-client privilege, prepared in anticipation of litigation or for trial, or otherwise protected or immune from discovery, shall not constitute a waiver of any privilege or of any other ground for objecting to discovery of such information, material or documents or its subject matter, or of Defendant's right to object to the use of such information, material or documents during this or any later proceeding.

3. Defendant reserves the right to produce additional information and documents in the future which Defendant deems to be relevant.

4. Defendant has not completed investigation of the facts related to the issues in this litigation. The responses by Defendant are based on information currently known to and within the possession of Defendant and are given without prejudice to Defendant's right to produce evidence of subsequently-discovered information/documentation.

5. Defendant objects to the instructions and requests to the extent that they seek to impose obligations beyond those imposed under the New Jersey Court Rules.

SPECIFIC OBJECTIONS

1. Defendant objects to the requests to the extent that they seek information that is not relevant to the subject matter of this litigation and is neither necessary nor material to the prosecution or defense of this action.

2. Defendant objects to the requests to the extent that they are unreasonably burdensome, annoying, oppressive, harassing, overly broad, and will engender unreasonable expense or effort given the subject matter of the action and/or that the information requested is available to Plaintiff from other sources with equivalent ease and expense.

3. Defendant objects to the requests to the extent that the information requested is in the custody, control and possession of the Plaintiff or have already been otherwise provided by the Defendant to the Plaintiff during the course of this litigation.

4. Defendant objects to the requests to the extent that they are vague, ambiguous, unintelligible, or otherwise not susceptible to a response in their present form.

5. Defendant objects to the requests to the extent that they seek information from or relating to a third party.

5. [REDACTED] is my mother. [REDACTED] is my father.
6. No photographs, motion pictures or sound recordings were taken or made by me or on my behalf of any scene, object, incident, conversation or matter connected with this litigation.
7. My date of birth is [REDACTED]. My place of birth was [REDACTED].
8.
 - a. I graduated from [REDACTED] located at [REDACTED].
 - b. I was the graduating class of [REDACTED].
 - c. I earned a BA in Business Finance.
9. I have three siblings:
 - a. [REDACTED]
 - b. [REDACTED]
 - c. [REDACTED] resides in [REDACTED]. [REDACTED] resides in [REDACTED]. [REDACTED] resides in [REDACTED].
10. No, I was never suspended or disciplined at any educational institution.
11. No, I do not believe in corporal punishment. No physical pain should ever be inflicted on to children.
12.
 - a. Personality – 1 (Strong)
 - b. Self-control – 1
 - c. Tolerance of interiority in others – 1
 - d. Patience with others – 1
 - e. Charitableness – 1
 - f. Ability to get along with others – 1
 - g. Modesty – 3 (weak)
 - h. Conceit – 3
 - i. Interest in self – 2 (moderate)
 - j. Interested in family – 1
 - k. Interest in job or profession – 1
 - l. Interest in remaining a resident of the State of New Jersey – 2

13.

- a. Self-confidence – 2 (superior)
- b. Intelligence – 2
- c. Interest in self – 3 (inferior)
- d. Interest in Others – 2
- e. Disciplinarian – 2
- f. Provider – 2
- g. Mental Stability – 2
- h. Need to relate to others – 2
- i. Need to related to child/children – 2
- j. Interest in child's/children's welfare – 2
- k. Sensitivity – 2
- l. Excitability – 3
- m. Control of emotions under stress – 2
- n. How well suited to care for child/children – 2
- o. More outgoing – 2
- p. Range of interest outside of profession, business or occupation – 2
- q. Ability to run a household – 2
- r. Financial acumen – 2
- s. Health – 2
- t. Affection toward Spouse – N/A

14. The most important things to me in life (in descending order) are: Faith and Family.

15. No history or mental or emotional sickness in my family.

16. No history of hospitalization for mental and/or emotional sickness in my family.

17. No history or suicide or attempted suicide.

18. No, I have not used drugs in the past 10 years.

19. No, I have never been treated for drug use.

20. No, I have never been confined to any institution because of drug use.

21. No, I do not condone drug use in others.
22. N/A, Defendant objects to the requests to the extent that Plaintiff seeks information that is not relevant to the subject matter of this litigation and is neither necessary nor material to the prosecution or defense of this action.
23. No, in addition to my time at work I do not have any other work-related obligations and commitments.
24. No, I have never been examined or treated by a psychiatrist or psychologist.
25. N/A as to if there was a diagnosis ever made of my mental or emotional condition.
26. No, I have never been admitted and/or confined to a mental institution or facility.
27. No, I have never been arrested.
28. No criminal proceedings were initiated against me by any person other than Plaintiff.
29. I do not drink alcohol.
30. No, I have never been charged with driving a motor vehicle while being under the influence of alcohol, drugs or driving while impaired.
31. N/A as to any prescription drugs used in the past 2 years.
32. I am currently in great health.
33. My current physician is [REDACTED] located at [REDACTED].
34. I am Christian
35. Our child attends weekly service.
36. Yes, I intend to permanently reside in the State of [REDACTED].
37. No, I have never told our child that I intend to remove them from the State of [REDACTED].
38. Yes, I feel that custody of our child would be enhanced in my custody. I believe Plaintiff is mentally unstable and does not put the best interest of our child first. Defendant reserves the right to produce additional information and documents in the future which Defendant deems to be relevant.
39. No, I can't perceive any disadvantages to my child if custody were given to me.
40.
 - a. Yes, I am aware of deficit in Plaintiff's character.
 - i. The conversations that Plaintiff is having with [REDACTED] is inappropriate.
 - ii. 2015
 - b. Was this deficit ever discussed with Plaintiff?
41. I was born and raised in [REDACTED].
42. No, I do not have ties to any other state or country.

43. No, I have never suffered from any serious illness, sickness or disease within the past 10 years.
44. Unknown if Plaintiff has suffered from any serious illness, sickness or disease within the past 10 years.
45. Yes, Plaintiff cursed me out at her grandmothers residence located at [REDACTED] because I was awarded \$45,000 in counsel fees. [REDACTED] was visibly mad.
46. Yes, after the incident I tried to reassure [REDACTED] that everything was okay.
47. No, I never made any derogatory comments to our child about the Plaintiff.
48. No, I never discussed the subject matter of this litigation with our child.
49. Custody should be awarded to me because Plaintiff is not mentally stable and she does not act in our child's best interest.
50. No, my child has not displayed or revealed any unusual habits, abnormal tendencies or erratic behaviors. However, my time with Aspen up to now has been very limited.
51. I have not witnessed any unusual behavior.
52. [REDACTED] does not regularly take any medicine or drugs.
53. [REDACTED] is [REDACTED]-years-old, so I have not discussed custody issues with her and she has not expressed any preference.
54. The five most important considerations in our child's life according to our child in ascending order are: Food, School, Phone, Sports, Friends, and Family.
55. I do not suffer from any handicaps, disabilities, or chronic illnesses.
56. Moderate disciple, I believe that you must set boundaries, but still be flexible and treat kids with respect.
57. No, I have never struck Plaintiff within the past 24 months.
58. No, I have never attempted to strike the Plaintiff.
59. No, I never physically caused any harm to the Defendant either by pushing, shoving, tripping, spitting on or in any related way.
60. No, I have never struck our child within the past 24 months.
61. No, I never attempted to strike our child.
62. No, I never physically caused any harm to our child by pushing, shoving, tripping, spitting on or in any related way.
63. No, I do not have any traits or tendencies which I would not like our child to emulate.
64. Between the Plaintiff and myself, I am in a better position to influence our child because I have always put the needs of our child first.
65. The Plaintiff is a sensitive person. She suffers from mental health issues and does not want to seek help.

66. Yes, [REDACTED]'s has friends from school and on her sports team. All of [REDACTED]'s friends live in [REDACTED].
67. Yes, I spend time in the company of our child and her friends during playdates, sporting events, and birthday parties.
- 68.
- a. [REDACTED] attends [REDACTED] located at [REDACTED].
 - b. [REDACTED]'s teacher is [REDACTED].
 - c. [REDACTED] gets along with all of her classmates.
 - d. [REDACTED] gets along with her teacher.
69. No, our child has never been a disciplinary problem at any school.
70. Unfortunately, I am not able to help [REDACTED] with school as much as I would like because of my schedule. However, I enroll her in enrichment opportunities on the weekend.
71. N/A as Plaintiff and I do not reside together. When [REDACTED] is with me she seeks my company.
72. I do not have any audio or visual recordings.

CERTIFICATION

I, [REDACTED], hereby certify that the copies of my expert's CV annexed hereto is an exact copy of the entire CV rendered; that the existence of other documentation, either written or oral, are unknown to me and if such become later known or available, I shall serve them promptly on the propounding party.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: _____

[REDACTED] _____

TAB 1