

Prince William County JDR Model Requests for Documents (Support)

VIRGINIA:

IN THE JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT OF PRINCE WILLIAM COUNTY

Petitioner, v. Respondent, Case No. JA

To: {Party} c/o: {Counsel}

REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to Rules 4:1 and 4:9 of the Rules of the Supreme Court of Virginia, you are hereby directed to produce, for inspection and copying, by the undersigned counsel twenty-one (21) days after service of this request, to the offices of the undersigned counsel, the originals or true, complete and fully legible copies of the following documents within your possession, custody or control.

Definitions and Instructions

a. Pursuant to Rule 4:9(a) of the Rules of the Supreme Court of Virginia, documents means: "Writings, drawings, graphs, charts, photographs, and other data compilations stored in any medium from which information can be obtained [and] translated, if necessary, by the respondent into reasonably usable form."

b. As used herein, possession, custody and/or control includes any such documents within the possession, custody or control of you or any of your agents, including but not limited to attorneys, accountants, employees, private investigators, or others.

c. In the spaces provided herein below, and/or on supplemental or separate sheets, separately, with respect to each request or category, please specify:

- (1) Which documents are being provided;
(2) If and to the extent any such documents are (or were at the time of service of this Request) within your custody or control, but are not being produced, all reasons you are not producing the same;
(3) If and to the extent any such documents never were or are no longer within your custody or control, please specifically so state.

d. You must either produce the requested documents as they are kept in the usual

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course of business, or organize and label them to correspond with the categories in this Request.

e. As used herein, the term **your business entities** means any form of business enterprise (including but not limited to sole proprietorships, general and limited partnerships, joint ventures and corporations, and subsidiaries thereof) in which, during the specified time, you held at least a five percent (5%) equity (ownership) interest.

f. Requests numbered “#(M)” are taken from the Model Requests for Production of Documents approved by the judges of the Prince William County Juvenile and Domestic Relations District Court. As such, no objections as to the form of Model Requests will ordinarily be sustained by the judges of the Prince William County Juvenile and Domestic Relations District Court.

A. THE FOLLOWING REQUESTS ARE FOR USE IN CASES INVOLVING ISSUES OF SUPPORT.
[These requests cover areas involving income-earning property, accounts, employment, employment income, expenses and debts]

1(M) Provide monthly or other periodic statements for all checking, savings, credit union and money market accounts, or CD’s, held in your name, individually or jointly with any other person or your business entities, for the past two (2) years (excluding IRA, KEOGH and 401-K accounts).

RESPONSE:

2(M) Provide monthly or other periodic statements for all mutual funds, stocks, bonds, other securities or bonds, other securities or investment funds (including IRA, KEOGH and 401-K accounts) owned by you, individually or jointly with any other person or your business entities, for the past two (2) years.

RESPONSE:

3(M) Provide monthly or other periodic statements and any notes, contracts or other documentation regarding all outstanding notes, accounts receivable, or other debts owed to you, individually or jointly with any other person or your business entities, for the past two (2) years.

RESPONSE:

4(M) Your Federal individual income tax returns for the past two (2) years, including all schedules, attachments, W-2’s, 1099’s and K-1 Forms.

RESPONSE:

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5(M) For any business in which you are a partner, owner or shareholder (exclude stock in publicly-held corporations, in which you hold less than 1% of outstanding shares):

- a. All corporate and/or partnership federal income tax returns (including all schedules and attachments thereto) for the past two (2) years.
- b. The records of all gross receipts, disbursements, and accounts receivable and payable registers, ledgers, books and journals, for the past two (2) years for each such business entity.
- c. All documents which reflect any of your use of, or entitlement to use of, any auto, travel, entertainment, personal living or business expense provision or reimbursement for the past two (2) years.

RESPONSE:

6(M) Please provide:

- a. Your five (5) most recent employment pay stubs or pay vouchers from all employers [i.e., documents issued by an employer with each paycheck, reflecting your gross income for the respective pay period, as well as itemizing deductions therefrom].
- b. All of your bonus, commission, draw and expense reimbursement statements dated, issued or received during the past two (2) years.
- c. Your most recent Retiree Account Statement, or other statement, indicating the periodic retirement income benefits received during the past two (2) years.

RESPONSE:

7(M) All employment contracts, including deferred compensation plans, and other documents and correspondence evidencing any terms or conditions of employment for your current employment, and for your immediate past employment if you have been with your current employer for less than two (2) years.

RESPONSE:

8(M) All documents regarding work-related childcare used in the past year for any of your children.

RESPONSE:

9(M) If you claim any addition to the basic support obligation for extraordinary medical expenses of a child submit all documents regarding such expenses of any child incurred in the past year. Also, include all documentation indicating the amount of any of these expenses covered by insurance, and the amount paid by anyone else.

RESPONSE:

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10(M) All monthly and annual credit card statements and receipts for all charge accounts listed in your name, individually or jointly with another, for the past two (2) years.

RESPONSE:

11(M) If you claim an adjustment in income for supporting "other children", that is children for whom the opposing party is not a parent, because you pay a regular child support for such child, provide all agreements or court orders supporting such claim.

RESPONSE:

12(M) If you are presently unemployed, or employed less than full-time (35 hour/week), provide a copy of your resume.

RESPONSE:

13(M) If you are presently unemployed, or employed less than full-time (35 hour/week), provide all documentation of your efforts to seek new or full-time employment during the past two (2) years, to include, but not limited to, job postings to which you applied, applications, responses from potential employers, confirmation of receipt of application, etc.

RESPONSE:

14(M) Provide the Curriculum Vitae (CV) for each of your proposed experts, as well as all reports or any other correspondence relating to the facts and opinions of all of your proposed experts (including but not limited to his/her final report) if you intend to use these as evidence.

RESPONSE:

15(M) Produce any and all documents or other tangible items, including without limitation tape recordings or photographs, produced by any individual or entity as a result of any subpoena *duces tecum* issued herein at your request.

RESPONSE:

16(M) Provide all documents which support your contention that there has been a material change in circumstances which warrants a modification since entry of the last order regarding support.

RESPONSE: