

# EVANS FAMILY LAW GROUP

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## **CASE PREPARATION WORKSHEET - DIVORCE**

Client's Name: \_\_\_\_\_ Date: \_\_\_\_\_

This form is to assist you in providing our office with the history of the facts surrounding this case and list of witnesses for our use in depositions, hearings, or trials which may be scheduled in your case. Below is an outline of the types of information we will need:

### **CASE HISTORY**

1. How often have you and your spouse moved during your marriage? Please describe in detail each place that each of you have lived and the length of time at each location.
2. Please provide the following information regarding your children:
  - a. school attended, if any
  - b. grade level
  - c. any teachers and/or the principal known by you
3. Please provide a detailed account of your spouse's educational background.
4. Please provide a detailed account of your spouse's employment history.
5. Please provide a detailed account of your educational background.
6. Please provide a detailed account of your employment history.
7. Please describe the courtship prior to marriage, as specifically as you can recall.
8. Please describe the length of engagement and the type of ceremonial marriage planned on your behalf.

9. How long have you been married to date?
10. After the date of marriage, how long was it before you became pregnant with your first child?
11. Please describe, in detail, each parent's reaction to each pregnancy.
12. Have you or your spouse had a sexual relationship with anyone other than each other during the period of your marriage? If so, please state their names and the dates of occurrence.
13. Have you or your spouse had unrelated adults spend the night during the period of your marriage? If so, please state their names and the dates of occurrence.
14. Have you made any gifts of funds, money, property or property rights in excess of a value of \$50 to any adult, other than your spouse, within the last five years? If so, then please state to whom the gift was made, the value of the gift, and the nature of the gift.
15. Have you or your spouse taken any trips with any adult other than each other during the period of your marriage? If so, please state with whom, when, the destination, the purpose of the trip and the dates of occurrence.
16. Have you and/or your spouse sought marital counseling?
17. Please describe in detail who has been the primary caretaker of the children since their birth. For purposes of this question, please describe the primary caretaking of the children on a year-to-year basis.
18. Please list your spouse's best and worst parenting traits.
19. Please list your best and worst parenting traits.
20. Please describe any problems the children may have, both physical and emotional, and what the cause or causes may be.
21. Please list any parenting responsibilities either of you have assumed in order to compensate in any areas necessary for your spouse. (This answer should include taking the children to school, doctors, dentists, participating in extracurricular activities, shopping, etc.)

22. Please describe your capabilities for assuming custody of the children if the Court decides you should be appointed as Sole Managing Conservator:

- a. what plans will you make for education;
- b. what plans will you make for day care;
- c. what plans will you make for financial support; and
- d. what religious traditions will you observe.

23. How does your spouse discipline the children?

24. How do you discipline the children?

**With regard to you individually, please answer the following questions:**

25. What are your working hours? Are those hours flexible?

26. Does your work require travel? If so, what distances, length of time are you gone and with what frequency?

27. Is your work schedule likely to change in the future?

28. What are your plans for child care both during travel and when you are at home?

29. Describe your housing arrangement, including number of bedrooms and the specific arrangements which you will make for the children.

30. Do the children have any special or unusual education or health care needs? If so, please describe them in detail.

31. What you done to meet the children's special needs?

\_\_\_\_\_  
Print Name: \_\_\_\_\_

Date: \_\_\_\_\_