

EXAMINATION

1. State your name. Where do you live? What is your date of birth, How old are you? Where are you from? Are your parents alive? Do you have any siblings? Is yours a close family? Do you stay in touch with your parents? Does your mother provide assistance to you in regard to the kids? Do they have a relationship? Are your father and stepmother close to the kids? Are they close to them? Has your family some traditions of vacationing / getting together? What are those? When does that typically occur? Grandparents important to you growing up? That tradition continuing with your children?
2. What is your family like? How were you raised? Values? What were you taught as fair expectations for life? Did religion play a role in your life growing up? What is that? Does it play a role now? What role is that?
3. What is your educational background? Did you have a job to go to school? Where? With Whom? How long were you employed with that company? Did you seek or obtain other employment? Where? With Whom? Why? With them For How long? Any changes after that? What etc.? What kind of work do you do at this time? Do you like your work? What kind of hours do you keep at work?

4. What kind of interests do you have outside of your employment? What kind of activities do you do for fun and relaxation? Have you tried to involve your children in your interests, activities, fun, or relaxation?
5. You are currently married to the Petitioner herein? When were the two of you married? Where were you married? How old were you when you got married to the Petitioner?
6. Prior to your marriage to the Petitioner, had you ever married? When? To whom? For how long? How old were you at times? Reasons for divorces? Did you try to have children with any of your previous spouses? Did you have any children with your previous spouses? Why?
7. Did you and the Petitioner in this matter have children? What are the children's names and dates of birth?
8. How old is your child(ren)?
9. Did the two of you reside in Tulsa County for more than 30 days preceding the filing of the petition in this case? Were the two of you residents of the State of Oklahoma for more than 6 months at the time of the filing of the Petitioner's petition in this matter?
10. How did you and the Petitioner meet? Where? When? Love at first sight? Why did the two of you decide to marry? What did you know

about the Petitioner's background and history prior to your marriage? What did you know about her upbringing? Values? Religion? What did you know about her spending habits? What did you know about her expectations for life? What did you know about her mental health before you got married? What did you know about her religious upbringing? What did you know about her financial savvy and spending habits? Did this knowledge give you concerns about the marriage? You obviously married despite those concerns, why?

11. Did you have good credit before the marriage? Did Petitioner have good credit before the marriage?
12. What did the Petitioner know about you prior to the marriage?
13. Was this a good marriage prior to the birth of your children? (Why?) Did the two of you discuss having children before the Petitioner became pregnant? [What were your views in that regard? Hers? Discussed?]. What problems did the two of you have prior to the birth of your child(ren)?
14. How did you two get along after the birth of your first child? Were you at the hospital for the birth? Was this a joyous occasion?
15. What roles did the two of you play after the birth of your child(ren)? Did your roles change over time in the marriage?

16. Was your child's birth planned? How far apart in age are your children?
17. Did your roles change after the birth of your firstborn? Did your relationship change after the birth of your second child? How?
18. Did Petitioner work any time during the marriage? Were you the sole breadwinner? What were you earning when the two of you first got married? Where did you reside at that time?
19. How were the household finances managed at your home with the Petitioner? How did that work out? Did things change over time? Why? Did the Petitioner's spending habits change over time? Management and control change over time?
20. When did you first have significant problems with this marriage? What were those problems? Did the two of you seek counseling? Did the counseling do any good? In your mind did you contribute to the problems? If so, how? What was the Petitioner's belief as to the cause of your marital discord? Did you make attempts to keep your marriage together? What were those? When did that occur?
21. Do you consume alcohol? What alcohol do you consume? How often, and how much? Was the extent of your alcohol consumption different during the marriage? Do you consume alcohol when you have your children?

22. Does the Petitioner consume alcohol? How much did she consume when you two lived together? What kind of alcohol did she consume?
23. Do you use tobacco products? What? Do you use those in the presence of your children? Do you object to the court entering such an order?
24. What role were you able to play in the children's lives prior to separation? What role did you play? What role did the Petitioner play? Has that changed since separation? How are you currently involved in your children's lives at this time?
26. How organized are you about time management? How organized are you about knowing everything there is to know about your children, and/or having the means to find something out about your children quickly?
27. Did you provide sole care to your children prior to separation? Did your spouse ever have any difficulty in allowing you to watch your children alone prior to the split up? How often did that occur? Did it occur right before the split up? Explain?
28. Did she ever suggest to you prior to the split up that there was any reasons you should not spend time with your children? Did you take

the kids to school every morning? Did you generally make breakfast for the kids in the mornings?

29. Did you want a divorce at the time that your spouse filed? What did you want to do? How old were your children at the time you and your spouse split up? How did the separation come about? Did you voluntarily leave the marital residence? How did you come to leave the residence? Under what conditions were you forced to leave the residence? Was the protective order ever tried to the court? Was it dismissed ultimately? How did this protective order affect you? How did you view it at the time? Where did you go? How much of your possessions were you able to obtain before leaving? What did you intentionally leave behind?
30. How do you view that protective order now? How long were you prevented from seeing your children by the protective order? What contact were you allowed with the children once you began getting to see them? How has that changed from then to now? When did those changes occur? Why?
31. Was there any factual basis for the Petitioner seeking a protective order on behalf of your children? Have you ever hurt your children,

emotionally or physically? Have you ever driven drunk with your children in the vehicle?

32. Was there any factual basis for the Petitioner seeking a protective order on her own behalf? What was the alleged factual basis?
35. Has the Petitioner ever been drunk in front of the children? Has the Petitioner ever struck you in front of the children? Has the Petitioner ever cursed at you in front of the children? Has she ever threatened you in front of the children? Has she driven drunk with the children? Has she ever thrown objects at you?
36. Why, in your opinion, has this case taken so long to resolve? Do you recall this court ordering that you were to have access to the former marital residence to recover your property prior to sale? When did that occur? What was the purpose of that order? Did the court's order prescribe a time and date for you to have access to the residence for the ordered purpose? Did you show up at the residence on that date? Did you bring anyone with you on that date? Who? What happened when you got there? What did you do?
37. During the pendency of this case, has the Petitioner shown any willingness to share the children with you? Do you know why? What are your regular periods of custody at this time? Has the Petitioner ever

offered to extend your time with the children? Have you ever asked her to extend your time with the children? How often? How did she respond? How do you make more time with your kids during the school year? Why have you done that? Given your time periods, how have you felt about the level of the children's outside activities? Why?

38. Has the Petitioner regularly allowed you telephone contact with the children when they are in her care? Why?
39. How much litigation have you engaged in merely seeking holidays and additional time with your children? Have you been able to take your children on traditional family holidays? What happened?
40. Has the Petitioner ever volunteered the children to you during her times of physical custody?
41. Has the Petitioner been willing to work with you in any way during the pendency of this case? On financial issues? Examples? On issues related to the children? Examples?
42. Where do you reside at this time? When did you move to that residence? Where did you reside prior to that time? Describe your current residence, square feet, bedrooms, etc. Do your children have their own bedrooms? Have you adapted this residence for your children's use? How? Have you made a real home for your children?

Do they enjoy being at your house? Do they like what you have done to the house for them? Do they seem comfortable at your house? Do the children express to you that they would like to spend more time with you at your house? Does that happen frequently? Do one of the children seem to express that more often than the other? Is that expression highly emotional?

43. Do you have a back yard? What kind of street do you live on? Do the kids ride their bikes in the street? Play in the back yard? Have they made friends in the neighborhood? Who are they? Do they have much contact with their friends?
45. Do the kids have rules at your house? What are they? What are the consequences for not following the rules?
46. Do you think the Petitioner's residence is adequate and proper for your children? Why?
47. Have you been involved with the kids' schooling? How?
48. Have you been involved with the kids' religious upbringing? How?
49. Have you been involved with the children's extracurricular activities? How? What activities are they engaged in?
50. Have you been concerned about the number of activities that the Petitioner has engaged the children in? Why?

51. Has the Petitioner discussed these activities with you prior to enrolling the children?
52. Do you rely on the Petitioner for information about the children? Why?
53. How prepared are you to find out everything you need to know about the kids?
54. Have you been involved with the children's medical and psychological needs? How? Have the two of you been able to discuss these needs and address them together? Why?
55. What problems have you had with the Petitioner during the course of this case regarding your children?
59. Do you have an objection to psychotherapy?
60. Have the children been to other therapists? Which child? Therapist? For what presenting issues? Therapy ongoing? Progress being made? How are the kids doing now? Do you think they will benefit from the granting of this divorce? How?
61. Is the Petitioner a fit and proper person to have custodial rights with respect to your children? Do you have concerns about her judgment? What are those? Do you have concerns about her as a mother? What? Do you have any concerns about the two of you communicating about the children? What? Why?

62. What is the worst thing you can say about the Petitioner (1) as a parent and (2) as a person?
63. Are you a fit and proper person to have custodial rights with respect to your children? Is your judgment sound? Should the court have any concerns about you as a father? Can you improve your communication with the Petitioner about the children?
64. What is the worst thing you can say about yourself (1) as a person and (2) as a parent?
65. What kind of custodial arrangements do you want the court to make in this case? Do you think that is in the best interests of your children? Why? Have the two of you been able to effectively discuss issues involving the children and resolve them? Why not? How do you propose that the court implement your custodial arrangements in a way that will assist you two? How do you propose that the two of you make decisions regarding the children's health? Medical? Religious? Social life? Extracurricular activities? Why?
66. Do you really believe that there is a way for the two of you to communicate without hostility and continue to co-parent these children? How? What would you think of a model that made the two of you, rather than co-parents, equal parents, with each parent making all

decisions except schooling during their time with the children? School would have to be dealt with annually, and if the parents could not agree on that, a third party could be appointed. Do you think that model might work better in this case? Why?

67. What kind of time do you have available to be with your children?
68. What regular time would you request that the court order for your contact with the kids? Why? Do you think that time split is in the children's best interest? Why? What provision for holidays and vacations? Summer? Telephonic contact when with the other parent? Choice of care providers? Rights of first refusal?
69. What time for the Petitioner? Why is that in the best interest of your children?
70. Has the current time split adversely affected your children?
71. How? Has joint decision making ever occurred with the two of you since the entry of this court's temporary joint custody order? Has that adversely affected your children? How? What would you propose that this court do to remedy this situation?
72. How is your health?
73. Do you think you have any deficits as a parent? What deficits?
74. Do you think the Petitioner has any deficits as a parent? What deficits?

75. What is your children's bed time at your house? What is children's bed time at mom's house? What time do the kids get up at your house? What time do the kids get up at mother's house? How far apart do you and the Petitioner live from one another?
76. Do you believe it is in your children's best interest for the court to issue orders about how the two of you communicate? How principally have the two of you communicated during the pendency of this case? Why? Are you aware of any such order issued in this case? How would you propose that the Petitioner communicate with you regarding the children? At this time do you have any desire to discuss any other topic with the Petitioner?
77. Are you requesting a divorce on the grounds of incompatibility? Any hope of reconciliation in this marriage?
78. Were you working at the time of your marriage to the Petitioner? Where? What were your earnings at that time? What are your earnings at this time? Was the Petitioner working at the time of your marriage? How was she employed? What were her earnings? Is she employed at this time? What are her earnings now? How do you know that?

88. Did you try to work joint filings with the Petitioner? How did that go? What was the economic effect of your filing separate? Would the two of you have come out better if you had jointly filed? How so?
89. Has the Petitioner claimed your children as an exemption each year? Have you requested that she share those exemptions? How was that met? How would you like the court to address that issue in the future?
90. What are your current gross monthly earnings? What is your normal take home pay? Do you have any other sources of income other than from your employment?
94. What property did the two of you own jointly at the time of your separation? What was your separate property at the time of separation?
95. What was the Petitioner's separate property at the time of separation?
96. Was your former marital residence sold during the pendency of this case? Was it sold pursuant to a court order? That could not be done by agreement? Why?
97. What was the house sold for? How much did the two of you derive in net proceeds from that sale? What was done with those proceeds?

98. Do you and the Petitioner owe any debts related to that residence other than the mortgages thereon? What was that? When did that occur? Why?
100. What do you think the court, in exercising its duty to equitably divide the marital estate, should do with the proceeds of the sale of the residence? Why?
101. Did you acquire any retirement benefits during the marriage from your employment? What are those rights? Do you contribute to the plan? What kind of plan or plans do you have? Do you have any retirement benefits from any other source? What is that? What benefits are those? Were those benefits earned during the marriage?
109. How do you propose that the court exercise its mandate to divide this property equitably?
111. Do you recall what marital debts existed at the time of your separation? What were they? How much in marital debt did you have at the time of separation? How much in monthly payments to service that debt at the time of separation?
112. Who was assigned the task of maintaining these debts during the pendency of this case?

116. How did you manage to maintain these debts, and pay your living expenses, child support, and child related expenses during the pendency of this matter?
117. How much disposable income did you have per month? What were your ordinary monthly bills? How much were you going over monthly?
118. How did you deal with this over time?
120. How would you propose the court exercise its power of equitable division in dividing these debts? Why?
121. So if we equitably divide the marital portion of your retirement accounts, equitable divide the personal property, what should the court do with the debts and the remaining proceeds from the sale of the marital residence?
122. Now, as to child support, would you agree that the court should compute child support by the guidelines? Do you believe that if the court grants you substantial time with the children that you should have the benefit of a shared parenting adjustment to that computation? Why?
123. Did your income change substantially during the pendency of this case? Did the Petitioner's? Is that why you had me file a motion to modify the temporary order as to child support?

124. During the temporary order phase of this case, you were given a credit on the child support computation for maintenance of the parties' marital debt, correct? How much of a benefit that did provide to you per month?
125. When you paid off the parties' indebtedness with borrowed funds, do you think the court, in looking back for modification purposes should alter that adjustment for maintenance of those debts as of the pay-off date? Why? How?
126. Do you believe that the Petitioner's increase in salary will substantially affect your child support obligation when taken into account?
128. Do you believe that attorney's fees should be assessed against the Petitioner in this matter, and/or her attorney? Why?
129. Do either you or the Petitioner maintain health insurance on behalf of the children? Who? What does it cost? Should that policy be maintained on behalf of your children, until further order of this court?