

Client Name: _____

Date: _____

CLIENT QUESTIONNAIRE FOR CONTESTED CUSTODY CASES

INSTRUCTIONS: Answer all questions truthfully and completely and return your answers to our office as soon as possible but well before any hearing in your matter. It is imperative that you be candid! You should answer all questions relevant to your case. If a question does not apply to your particular situation, please indicate by marking the question "N/A." In providing answers to each question, please complete your answer on a separate sheet, referring to the question number to which your answer applies, and attach your answer to this questionnaire. The information you enter in this questionnaire is confidential and protected by Attorney-Client Privilege. The information will not be disclosed to anyone outside of this office, except in the course of rendering legal services on your behalf, or unless otherwise required by law. As your case progresses, if additional information becomes available, please update your questionnaire and get it to me as soon as possible.

NOTICE OF CONFIDENTIALITY: THE INFORMATION IN THIS DOCUMENT IS SUBJECT TO THE ATTORNEY-CLIENT PRIVILEGE, AS PROVIDED IN THE TEXAS RULES OF CIVIL EVIDENCE. THE CONTENTS OF THIS DOCUMENT CONSTITUTE ATTORNEY WORK PRODUCT. THE CONTENTS OF THIS DOCUMENT ARE CONFIDENTIAL AND ARE NOT TO BE DISCLOSED TO THIRD PERSONS OTHER THAN THOSE TO WHOM DISCLOSURE IS MADE IN FURTHERANCE OF THE RENDITION OF PROFESSIONAL LEGAL SERVICES.

1. List each person that currently lives in your home, including their age and relationship to you.
2. List the address for each of your residences in the last five (5) years.
3. List all of the jobs you have held in the last five (5) years, including in your answer the name and address of your employer, your job responsibility and your rate of pay.
4. List all of your marriages or cohabitation relationships including dates of commencement and separation. List all marriages or cohabitation relationships including dates of commencement and separations of the other party to your knowledge. Include the name and ages of all children as a result of all relationships for both you and the other party.
5. Have you ever been abused or neglected? If so, please describe including who abused or neglected you, the circumstances of the abuse or neglect and the dates of each incident. If the police have been called, please list the police department that was called and the address you resided when the police were contacted. Please include in your answer if Child Protective Services has ever been involved with you or your children.

6. Have your children ever been abused or neglected? If so, please describe in the same detail as requested in question five above.
7. Have you ever been involved in any acts of family violence, either you accused of assaulted another or you being assaulted yourself. If so, please describe, including the name and other person involved, the city in which the violence occurred, any witnesses who witnessed the events, whether the police were called and the address or location of where the violence occurred.
8. Have you or anyone else in the case ever received any psychiatric or psychological treatment or counseling? If so, please identify the person receiving the treatment or counseling, the dates of treatment and the purpose of the treatment.
9. Please describe your use of alcohol, if any. Include in your answer if you have ever received any treatment for alcohol related issues and a description of such treatment, any criminal cases that have been filed related to alcohol use including but not limited to public intoxication and driving while intoxicated, as well as any arrests that may not have resulted in charges. Please provide the same information regarding any other party in this case.
10. Please describe your use of illegal drugs, if any. Include in your answer if you have ever received any treatment for use of illegal drugs and a description of such treatment, any criminal cases that have been filed related to illegal drug use or possession as well as any arrests that may not have resulted in charged. Please provide the same information regarding any other party in this case.
11. If you are currently taking any prescription drugs, please list the drugs you are taking. Include in your answer, the name of the drug, the doctor prescribing the drug, the dosage and the purpose for the medication. Please describe the same information regarding any other party in this case.
12. If you or any other party in this suit has a criminal history, please describe. Include in your answer any arrests and convictions, the dates of the arrests or convictions, the nature of the offense and the outcome.
13. Which parent took care of the child(ren) during the marriage or relationship?
14. What did each parent do for/with the child(ren) on a daily basis?
15. What are the child(ren)'s daily routines?

16. Does the child(ren) attend school, daycare, and/or after care? If so, what is the name of the placement, address, contact person and contact phone number?
17. In which grade is the child(ren)? How does the child(ren) perform in school?
18. What are the names of the child(ren)'s teachers?
19. Who attends the child(ren)'s medical appointments?
20. Who attends the child(ren)'s dental appointments?
21. Who attends the child(ren)'s parent-teacher conferences?
22. Who attends the child(ren)'s school activities parents are allowed to attend?
23. If you and the opposing party participate in recreational or educational activities with the child(ren) describe the nature of those activities and how often you and opposing party participate in them.
24. Who attends the child(ren)'s activities not related to school?
25. If the child(ren)'s was in counseling, who attended counseling sessions?
26. Who are the child(ren)'s doctors? When was the child(ren) last seen?
27. Has the other parent met the child(ren)'s teachers? If so, who? When?
28. Has the other parent met the child(ren)'s doctors? If so, who? When?
29. Has the other parent met the child(ren)'s counselors? If so, who? When?
30. Make a list of your strong points and your weak points as a parent and a person.

31. Make a list of the other party's strong points and weak points as a parent and a person.
32. Are there any court proceedings pending in this matter and if so give the name of court, name of the judge, date of the filing, court docket number, and status of case?
33. Have you and the opposing party been in litigation against each other in the past, and if so give the name of the court, county and state, name of the judge, date of the filing, court docket number, and status of case?
34. Have you consulted or retained any other attorney on this matter before coming to this office, and if so, state who and when?
35. If you are requesting primary custody of the child(ren), please state in fifty words or less why you think you should have primary custody.
36. For the past two years please indicate in detail with whom the child(ren) have resided and what the living arrangements have been for a two year time period?
37. To the extent that both you and the opposing party have shared the responsibilities listed below, describe the degree to which the responsibilities have been shared:
- a. Who helps the child(ren) get dressed in the morning?
 - b. Who bathes the child(ren) and grooms them?
 - c. Are any of the child(ren) nursing?
 - d. Who takes care of the child(ren) during the day?
 - e. Who arranges for getting child(ren) together with playmates?
 - f. Who puts the child(ren) to bed at night
 - g. Who prepares meals?
 - h. Who picks the child(ren) up from school?
 - i. Who shops for the child(ren)'s clothes?
 - j. Who transports the child(ren) to extracurricular activities?
 - k. Who arranges the child(ren)'s birthday parties
 - l. Who helps the child(ren) with their homework?
38. If you and the opposing party participate in recreational or educational activities with the child(ren) describe the nature of those activities and how often you and opposing party participate in them.
39. Do the child(ren) receive religious training, and if so from whom and for what purpose?

40. For what problems are the child(ren) likely to turn to you to help them and for what problems are they likely to turn to the opposing party?
41. Who disciplines the child(ren) and by what method?
42. Has the division of responsibility for child care changed over the years, if so please describe?
43. What are your working hours and that of the opposing party if you know.
44. What time do you leave home and return home and those same hours for the opposing party if you know.
45. Do you or the opposing party travel for work, and if so please describe the frequency, time involved and distance.
46. Do you have family members living in the city you reside in? If so, how are they related to you? Please provide the name, age, address, and telephone numbers for each family member and how often you have contact with them.
47. Does the child(ren) have any special or unusual educational or health-care needs, and if so please describe them.
48. Has the child(ren)'s academic performance changed in the last few years or months and if so what do you think the reasons for those changes?
49. Will it be alleged that you or the opposing party interfered with the child(ren)'s relationship with the other parent or that parent's family or spoken badly about the other parent or parent's family to the children?
50. Will it be alleged that you or the opposing party has blocked the other parent's visitation with the child(ren) and if so, explain fully giving dates and frequency with which visitation was allegedly blocked.
51. Will it be alleged that you or the opposing party has discouraged the child(ren) from having a good

relationship with a stepparent or a “significant person” in the other parent’s life and if so explain?

52. How well have you and the opposing party been able to cooperate on matters concerning the children and on matters concerning visitation or access to the children?

53. Have you or the opposing party moved in the last ten year? If so, when and where (include moves in the same city).

54. Do you or the opposing party have plans to move in the near future? If so, when and where?

55. Has the child(ren) told you with whom he/she wants to live? If so, please answer these questions?

- a. What is the basis for the preference?
- b. How long has the preference been held?
- c. Has the preferenced changed?
- d. How would you feel about the child(ren) talking to the judge about their preference and what would you think they may say?

56. If you have more than one child, how do the children get along with each other?

57. How does the child(ren) get along with stepparents?

58. How does the child(ren) get along with stepbrothers and stepsisters?

59. Does the child(ren) have a strong relationship with anyone else that you believe is important including grandparents?

60. What are your future goals with the child(ren) and the reasons for your goals?

61. To what extent do you believe that you and the opposing party should have joint custody or shared parental responsibility, under which you both would share equally in making major decisions affecting the children and/or being with the child(ren) for substantial periods of time?

62. What are the opposing party’s goals with the child(ren) and the reasons for those goals if you know?

63. Have you and the opposing party attempted to work out a settlement of the case between yourselves?

F If so, what progress have you made and what has your position been and what has the opposing party's position been?

64. Who do you think would make good witnesses for you, and what do you think the testimony would be? (possible witnesses include neighbors, the children's teachers, friends, doctors, babysitters, daycare workers, clergy, and family members). Please list their name, address, home phone, and work phone.
65. Who do you think will be witnesses for the opposing party, and what do you think will be the testimony of those persons? Please list their name, address, home phone and work phone.
66. Have you or the opposing party made any photographs or audio or visual recordings of the other party? If so, describe the content.
67. Do you or the opposing party have a website, included but not limited to my space, facebook, match.com, etc. What is your username for each?
68. What are your future desires for both yourself and your children? (3 year plan)

"Skeletons In the Closet" and Sensitive Topics:

IT IS IMPERATIVE THAT YOU BE OPEN AND HONEST IN ANSWERING THE FOLLOWING QUESTIONS. ANY DISCUSSION RELATING TO ANY OF THESE TOPICS BETWEEN YOU AND YOUR ATTORNEY WILL BE PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE. IF YOU FAIL TO BE HONEST IN ANSWERING THESE QUESTIONS, IT COULD BE ABSOLUTELY DISASTROUS TO YOUR CASE.

IF AN ANSWER TO ONE OF THE QUESTIONS BELOW IS "YES" PLEASE DESCRIBE THE SITUATION IN GREAT DETAIL.

Will anyone allege that you or the opposing party has done any of the following:

	You	Opposing Party
1. Committed a crime?	_____	_____
2. Been arrested	_____	_____
3. Been in jail or prison	_____	_____
4. Used illegal drugs	_____	_____
5. Been hospitalized for drugs	_____	_____

6.	Abused prescription drugs	_____	_____
7.	Abused alcohol	_____	_____
8.	Been hospitalized for alcohol	_____	_____
9.	Been arrested for DUI/DWI	_____	_____
10.	Engaged in gambling	_____	_____
11.	Engaged in other illegal activities	_____	_____
12.	Attempted suicide	_____	_____
13.	Emotional/psychiatric hospitalization	_____	_____
14.	Emotional or psychiatric condition	_____	_____
15.	Abused by anyone	_____	_____
16.	Been accused of abusing anyone	_____	_____
17.	Been accused of child abuse	_____	_____
18.	Affair	_____	_____
19.	Sexual relationship children were Aware of	_____	_____
20.	Homosexual/bisexual relationship	_____	_____
21.	Swinging activities	_____	_____
22.	Other sexual practices (unusual)	_____	_____
23.	Pregnancy outside of marriage	_____	_____
24.	Sexually transmitted disease	_____	_____
25.	Abortions	_____	_____
26.	Drunk to excess	_____	_____