

Prince William County JDR Model Requests for Documents (Custody/Visitation)

VIRGINIA:

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

_____ ,)	
Petitioner,)	
)	
v.)	Case No. JJ _____
)	
_____)	
Respondent,)	

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.

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

<p style="text-align: center;">THE FOLLOWING REQUESTS ARE FOR USE IN CASES INVOLVING ISSUES OF CUSTODY AND/OR VISITATION.</p>
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1(M) The factors set forth below are derived from §20-124.3, Code of Virginia, and are used by the court in determining custody and visitation. For each such factor which you claim is important for the Court to consider in awarding custody, supply all documents supporting such claim:

- (a) The age and physical and mental condition of the child, giving due consideration to the child's changing developmental needs;
- (b) The age and physical and mental condition of each parent;
- (c) The relationship existing between each parent and the child, giving due consideration to the positive involvement with the child 's life, the ability to accurately assess and meet the emotional, intellectual and physical needs of the child;
- (d) The needs of the child, giving due consideration to other important relationships of the child, including but not limited to siblings, peers and extended family members;
- (e) The role which each parent has played and will play in the future, in the upbringing and care of the child;

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(f) The propensity of each parent to actively support the child 's contact and relationship with the other parent, including whether a parent has unreasonably denied the other parent access to or visitation with the child;

(g) The relative willingness and demonstrated ability of each parent to maintain a close and continuing relationship with the child, and the ability of each parent to cooperate in and resolve disputes regarding matters affecting the child;

(h) The reasonable preference of the child, if the court deems the child to be of reasonable intelligence, understanding, age and experience to express such a preference;

(i) Any history of family abuse;

RESPONSE:

2(M) Produce a copy of the family calendar for the past two (2) years.

RESPONSE:

3(M) Produce a copy of any diary or calendar or other record, if you keep one, of the times/days that each party had physical custody of the child during the past two (2) years.

RESPONSE:

4(M) Provide copies of any convictions, charging documents, court records, police records, social services records, and any other documents related to any criminal charge or abuse and neglect claim you have had investigated against you at any time.

RESPONSE:

5(M) Provide a copy of a work schedule, if any, which evidences a typical work week.

RESPONSE:

6(M) Provide all documentation regarding all day care providers used in the past year. Include billings, brochures, correspondence, etc.

RESPONSE:

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7(M) Provide all documentation regarding the identity of any child's health care providers during the past two (2) years.

RESPONSE:

8(M) Provide all documentation regarding the education of any child at issue in these proceedings, during the past two (2) years, including but not limited to report cards, records of conferences, Individualized Education Plans, reports of disciplinary actions taken, class schedules, course descriptions, test results from tests taken by any child, memoranda or letters to and from the children or parents and school personnel and authorization forms for activities and emergency medical care.

RESPONSE:

9(M) Provide all documentation regarding the extracurricular activities of any child at issue in these proceedings, during the past two (2) years, including registration forms, newsletters from any child's teams and/or coaches, authorization forms for activities and/or emergency medical care, team rosters, game schedules, and programs.

RESPONSE:

10(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 those as evidence.

RESPONSE:

11(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:

12(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 custody and/or visitation.

RESPONSE: