DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : AUGUST \_\_, 20

**PLAINTIFF’S REQUEST FOR DISCLOSURE AND PRODUCTION**

 As provided in Connecticut Practice Book section 25-32, the Plaintiff requests that the Defendant provide the following documents within sixty days of the date of this motion:

 1. All federal and state income tax returns (including all schedules attached thereto) filed within the last three years, including personal returns and returns filed on behalf of any partnership or closely-held corporation of which a party is a partner or shareholder.

 2. IRS forms, W-2s, 1099s and K-1s within the last three years including those for the past year if the income tax returns for that year have not been prepared.

 3. Copies of all pay stubs or other evidence of income for the current year and the last pay stub from the past year.

 4. Statements for all accounts maintained with any financial institution, including banks, brokers and financial managers, for the past 24 months.

 5. The most recent statement showing any interest in any Keogh, IRA, profit sharing plan, deferred compensation plan, pension plan, or retirement account.

 6. The most recent statement regarding any insurance on the life of any party.

 7. A summary furnished by the employer of the party’s medical insurance policy, coverage, cost of coverage, spousal benefits and COBRA costs following dissolution.

 8. Any written appraisal concerning any asset owned by either party.

 The Plaintiff further requests, pursuant to Section 25-31 and Section 13-9 of the Connecticut Practice Book, that the Defendant provide the following additional documents:

1. A Sworn Financial Affidavit.
2. All cancelled checks or deposit slips associated with accounts, including business accounts, maintained with any financial institution for the past 24 months.
3. All statements, receipts, or records pertaining to credit and/or charge cards in your name or in the name of any business entity with which you are associated in any manner, for the last three (3) years.

THE PLAINTIFF

 JOHN DOE

 By: 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510

CERTIFICATE OF SERVICE

 I hereby certify that a copy of the foregoing was electronically sent to the following counsel of record on this \_\_ day of August, 20\_\_:

**Insert contact info for all parties of record here (except yourself)**

 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510