

**IN THE PROBATE COURT FOR \_\_\_\_\_ COUNTY  
STATE OF GEORGIA**

**IN RE: ESTATE OF**

\_\_\_\_\_,  
**Deceased.**

\_\_\_\_\_,  
**Petitioner.**

\_\_\_\_\_,  
**Caveator.**

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**Estate No: \_\_\_\_\_**

**CAVEATOR'S FIRST INTERROGATORIES TO PETITIONER**

**TO: \_\_\_\_\_**

You are hereby requested pursuant to O.C.G.A. § 9-11-26, O.C.G.A. § 9-11-33 and O.C.G.A. § 9-11-34 to answer the following interrogatories separately and fully in writing under oath within thirty (30) days from the date of service as provided by law and a copy of the answers be furnished to Caveator's counsel, \_\_\_\_\_

\_\_\_\_\_.

**DEFINITIONS AND INSTRUCTIONS**

- a. The term "identify" when used with reference to a person means such person's name, present home and business address, present home and business telephone numbers and present position of employment.
- b. The term "identify" when used in reference to a document means a description of the type of document, the identity of the person or persons who authored, signed or prepared it, the identity of the addressee(s), if any, and the recipient(s) of the original copy thereof; the date of the documents, or, if none, the approximate date of its preparation; the present location or custodian.
- c. A "communication" or "communications" means all oral conversations, discussions, letters, telegrams, memoranda, meeting minutes, emails, facsimile transmissions, and any other transmission of information in any form, both oral and written.

- d. A "document" means any legal documents, business records, letters, memoranda, notes, statements, reports, work papers, drafts, copies, inter-office and intra-office communications and messages, drawings, and graphic material, whether created or stored in written, printed, tangible, electronic, mechanical, or electrical form of any kind, including material on computer hard drives, tapes, disks, files, and other memories, backup copies and "deleted" files, whether located on-site or off-site,
- e. "You" includes your agents, employees, insurance company, their agents and employees, and your attorneys, investigators and anyone else acting on your behalf.
- f. "Custodian" refers to the person having possession, custody or control of any writing or physical evidence.

### INTERROGATORIES

1. Provide an itemization and description of each expense you claim as a part of your claim for year's support.
2. Provide the following for each and every life insurance policy upon the life of \_\_\_\_\_:
  - a. Name of Insurance Company;
  - b. Policy amount;
  - c. Whether funds have been received yet by you;
  - d. The name of all loss payees; and
  - e. Policy Number.
3. Provide the following for each and every retirement or investment account payable to you upon the death of \_\_\_\_\_:
  - a. Name of Bank or Investment Company;
  - b. Amount in Account (and amount paid out if payment received);
  - c. Whether funds have been received yet by you;
  - d. The name of all other beneficiaries if applicable; and
  - e. Account Number.
4. List the source and amount of all income you have received since the death of \_\_\_\_\_.
5. List the source and amount of all income you have received for the two year period prior to the death of \_\_\_\_\_.
6. Identify all witnesses that you may call at the hearing of this matter, and for each person identify the subject of his or her knowledge.

7. List the amount and location of all cash you have discovered following the death of \_\_\_\_\_.
8. Are you the beneficiary of any trust? If so, identify the trust, identify the settlor, and state what benefits you receive from the trust.
9. Itemize all creditor claims you have received against the estate of \_\_\_\_\_.
10. If you have placed a monetary value on the real property you seek as a part of your claim for year's support, state the value and how it was derived.
11. If you have placed a monetary value on the automobiles you seek as a part of your claim for year's support, state the value and how it was derived.
12. State each and every location where you have resided since the death of \_\_\_\_\_.
13. Have you driven any automobile belonging to the estate of \_\_\_\_\_ since his death? If so, state which vehicle(s) and how often you have driven each vehicle.
14. Did you use funds or assets belonging to the estate of \_\_\_\_\_ to pay your attorney for preparing, litigating, consulting, or providing any other services related your claim for a year's support? If so, state the amount or identify the asset(s).
15. Identify and describe all jobs you have performed for compensation in the past five years.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

/s/\_\_\_\_\_