

The Law Office of Natalie Gregg

1333 W. McDERMOTT, SUITE 200, ALLEN, TEXAS 75013

NATALIE@NATALIEGREGG.COM • (469) 519-1026 TELEPHONE • (469) 519-1009 FACSIMILE

CASE PREPARATION WORKSHEET

Introduction: In order to fully prepare for your case, full disclosure is necessary. Please review this outline and send it back to the office to Natalie@NatalieGregg.com for your file. This outline helps you complete a personal history and list of witnesses for our use in depositions, hearings or trial which may be scheduled in your case.

PERSONAL HISTORY

- A. Courtship
 - 1. Where did you meet?
 - 2. How long did you date prior to marriage?
- B. Three to six months prior to marriage
- C. History of marriage in 5-year increments
- D. Last two years (with more detail devoted to these last few years)
 - 1. Your work history: current job title, salary, bonuses and deferred compensation/benefits
 - 2. Spouse's work history: current job title, salary, bonuses and deferred compensation/benefits
 - 3. Differences in perspective with spouse: religious, parenting, discipline
- E. When was the last time that your relationship was good? When did the breakdown happen?
- F. Friends
 - 1. Your friends
 - 2. Your spouse's friends
 - 3. Active and/or inactive social life
- G. Skeletons in your closet
 - 1. Use of illegal drugs or alcohol currently? In the past?
 - 2. Ever attended rehab? When?
 - 3. CPS intervention? When?
 - 4. Affairs? When?
 - 5. Psychiatric diagnosis/commitment to psych facilities? When?
- H. Pre-marriage
 - 1. Highest level of education?
 - 2. Prior marriage? Prior children?
 - 3. Employment prior to this marriage?

PERSONAL HISTORY, cont.

- I. Parenting Skills
 - 1. Best and worst traits parenting
 - 2. Spouse's best and worst traits parenting
 - 3. Any special needs or concerns about children
 - 4. How did you and your spouse divide parenting duties (bathing, doctors, dressing, feeding)
 - 5. Which activities did you participate in with your child

FAVORABLE WITNESSES

- J. Make a list of favorable witnesses for hearings or trial and for each, give the following info:
 - 1. Name
 - 2. Telephone number: home or work
 - 3. Address at home and at work
 - 4. Knowledge for the case: What will they testify to in court?
 - 5. Relationship to you (friend, relative, neighbor)

- K. Professional witnesses
 - 1. Experts
 - 2. Teachers
 - 3. Doctors, Occupational Therapists
 - 4. Psychologists/Therapists
 - 5. Psychiatrists
 - 6. Lawyers (Your former lawyers/spouse's former lawyers)
 - 7. Ministers
 - 8. Professionals involved in children's lives

- L. Neighbors who have seen interaction with your spouse in a favorable light, and who have seen your parenting skills

- M. Friends and/or acquaintances who have seen you interact with your children in day-to-day

- N. Friends and/or acquaintances, including social or business friends, who can testify as to your character, reputation and abilities

- O. Family members who have seen your parenting skills as they relate to children seen your home in a positive, functioning manner, and with your spouse regarding same

- P. Miscellaneous: School teachers, counselors, or other faculty of the children's school who are aware of your positive parenting skills, support, and participation with the children.

ADVERSE WITNESSES

Make a list of any and all adverse—problem—witnesses you feel your spouse will call to testify against you. Please use the same categories as those listed above and supply information for each which could show any detrimental fact against you.