

Potential Discovery Served by Foster Parents

→ There are two categories of discovery to expect – 1) discovery that foster parents serve on Kai and Jasmyn (your clients), and 2) discovery they serve on Dorothy (would-be kin provider, not your client).

→ Their Overall Goals – Dig up dirt on grandmother, highlight lack of involvement of Kai and grandmother in Jasmyn's life for the last year, identify grandmother's lack of resources or plan to take care of Jasmyn, hone-in on grandmother's failure to request Jasmyn in the first place, and pin down theory of the case supporting placement with grandmother.

Likely Discovery from Foster Parents – Served on Jasmyn & Kai (your clients)

ROGS

- If you believe Dorothy is the appropriate primary physical custodian for Jasmyn, state in detail what you allege to be the reasons which bring you to that conclusion (including specific facts, dates of occurrence, and all persons involved witnessing each such occurrence).
- Please describe Kai's involvement in Jasmyn's life over the past twelve (12) months.

RFAs to Kai

- Admit that you have only seen Jasmyn over the past ten (10) months on the following occasions: (I'm guessing this is not very often, given the Grand Junction / Denver distance).
- Admit that you missed _____ (Jasmyn's birthday, Christmas, daycare concerns, etc.).

RFPs to Kai & Jasmyn

- Please disclose any written documentation supporting your responses to the Interrogatories served contemporaneously herewith.
- Please provide all of your educational, health, and therapeutic records.

Likely Discovery from Foster Parents – Served on Dorothy (NOT your client)

→ Note: These are sample questions for anyone questioning a placement. You could use these if you contested placement with Dorothy, or you could serve them on the foster parents.

ROGS TO WOULD BE PLACEMENT PROVIDER (Dorothy)

- Please identify every civil or criminal case in which you have been a defendant or participant in any way, and state the circumstances of that case, including, but not limited to: 1) case number; 2) jurisdiction; 3) claims or charges of the case, and 4) outcome of the case, including what plea was entered, if applicable.
- Has the Department of Human Services or any other agency ever investigated you regarding an abuse or neglect claim? If so, please identify: 1) the identity of the agency;

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2) date of the claim; 3) description of the offense; 4) outcome of the matter, and 5) the identify of any person with knowledge of the facts stated in response to this Interrogatory.

- State the general condition of your physical and mental health at the present time, including reference to any physical disabilities or chronic ailments, continuing diagnosis, mental health disorders, prescribed medication, addiction recovery or services, and continuing treatment or care plans, including the name, address, and telephone number of any physician, hospital or practitioner, psychologist, psychiatrist, or mental health professional who is presently or has at any time in the past five years treated you for such condition.
- Describe the nature of your relationship with Jasmyn, and your ability to assess and meet her intellectual, physical, and emotional needs.
- Describe the nature of your relationship with Kai, and your ability to assess and meet his intellectual, physical, and emotional needs.
- Describe in detail your involvement in Kai's education. Specifically list all educational concerns you have for Kai, steps you have taken to address those concerns, any parent-teacher conferences you have attended, and identify any person who can corroborate the facts you provide in response to this Interrogatory.
- Please provide the following information concerning your proposed child care arrangements for Jasmyn for periods when you are absent from the home: 1) name/address of provider; 2) age of provider (if younger than 18); 3) where is the care provided?
- Please describe in detail your plan for Jasmyn's education, including, but not limited to, what early education opportunities, schools, summer camps, special education or therapy providers, and any other supports you plan to implement for her.
- If you believe you are the appropriate primary physical custodian for the child, state in detail what you allege to be the reasons which bring you to that conclusion (including specific facts, dates of occurrence, and all persons involved witnessing each such occurrence).
- For any Requests for Admission that you deny, please explain your denial, including, but not limited to: 1) any specific facts supporting your denial, including dates, times, and witnesses, and 2) any documentation supporting your denial.

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RFAs TO WOULD BE PLACEMENT PROVIDER (Dorothy)

- Admit you did not ask for Jasmyn to be placed with you when the Case (defined term) was filed.
- Admit that you have only seen Jasmyn over the past ten (10) months on the following occasions: (I'm guessing this is not very often, given the Grand Junction / Denver distance).
- Admit that you missed _____ (Jasmyn's birthday, Christmas, daycare concerns, etc.).

RFPs TO WOULD BE PLACEMENT PROVIDER (Dorothy)

- Please disclose any written documentation supporting your responses to the Interrogatories or Requests for Admission served contemporaneously herewith.
- Please provide all educational, health, and therapeutic records of Kai.

NOTICE OF DEPOSITION (Dorothy)

- Your deposition has been noticed on ____ date.
- They unilaterally chose a date, inconvenient for Dorothy, and three hours away from where she lives with Kai (your client).