

Potential Discovery to Serve as GAL / CFY

Possible Discovery to Seek from Foster Parents as GAL for Jasmyn & CFY for Kai

→Overall Goals: 1) get evidence to show failure to value sibling relationship b/t Kai and Jasmyn; 2) find out if there's any other children these folks have taken into their home, and what happened to them; 3) pin down their theory of the case (i.e., why they think it's best for Jasmyn to live with them).

ROGS (Interrogatories)

- If you believe you are 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 in detail your plan for Jasmyn's relationship with Kai if Jasmyn is placed with you, including, but not limited to, sibling visits, telephone conversations, and time together.
- Please explain whether you believe it is important for Jasmyn to have a relationship with Khai, including, but not limited to, the reasons for your belief, your experience with sibling attachment and bonding, both professional and personal, and your understanding of Jasmyn's relationship with her brother.
- Please identify every effort you have made over the past twelve (12) months to permit Jasmyn to spend time with Khai, including the date, type of effort, and identify of any person with personal knowledge of your effort.
- Please identify every effort you have made over the past twelve (12) months to permit Jasmyn to spend time with Dorothy, including the date, type of effort, and identify of any person with personal knowledge of your effort.
- Please identify every foster child or nonbiological child who has lived with you over the past twenty (20) years, including: 1) his or her name; 2) date of birth; 3) current living situation; 4) the circumstances of why he or she lived with you, and 5) his or her telephone number, address, and, if applicable, email address.
- 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.

RFPs (Requests for Production)

- Please disclose any written documentation supporting your responses to the Interrogatories served contemporaneously herewith.

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RFAs (Requests for Admission)

- Admit that you have not made a single effort for Jasmyn to spend time with her brother, Kai.
- Admit that you have not made a single effort for Jasmyn to spend time with her grandmother, Dorothy.