

Rules Appendix XXXI

Uniform Interrogatories for Cohabiting Party Contesting Alimony Review - For Post-Judgment Application (N.J.S.A. 2A:34-23(n))

Pursuant to R. 4:17-1(c), all questions must be answered unless excused by the court or protected by privilege or order. Responses shall not be used improperly and shall follow the Rules of Court, including R. 1:38, and the Rules of Professional Conduct.

Consistent with Cardali v. Cardali, 255 N.J. 85 (2023), a party must answer these interrogatories only if the court makes a finding that a prima facie showing of cohabitation has been established. The Rules Appendix also includes suggested request for production of documents (Rules Appendix XXXI). The court shall conduct a discovery conference to issue an order for limited discovery. This will include filing updated case information statements as required by R. 5:5-4(a)(4), responding to interrogatories and requests for production of documents, and any other limited discovery deemed necessary by the court.

Discovery requested shall be limited to two years preceding the filing date of the cohabitation motion unless the court, for good cause, decides a different timeframe.

Each party can add ten additional questions, without subparts, to these interrogatories. Requests for more questions require court approval and shall be made by filing a motion.

General

1. Provide your full name, date of birth, current address, and any other addresses where you lived in the past two years, including the date(s), and how long you have lived at your current address.
2. List the names, email addresses, and physical addresses of everyone who knows relevant details about this case. For each person, describe what they know, including relevant dates and locations.
3. Provide the names and addresses of any expert witnesses or private investigators you or your counsel hired for this case. Include detailed qualifications for each expert and attach their current resumes. Attach copies of all written reports you have received from these experts.

4. Describe your current job and list your income for the past two years, including salary, bonuses, commissions, perks, equity awards, stock options, and any other compensation benefits.
5. Describe your relationship between you and the alleged cohabitant, including when and how you met, and why you oppose the review of your alimony due to the alleged cohabitation.
6. State when you began dating the alleged cohabitant and if the relationship is still ongoing and exclusive today.

Intertwined Finances

7. List all payments made between you and the alleged cohabitant, either by you to them or them to you, in the past two years. Include the following details for each payment and attach documents that verify each payment listed in your response.
 - a. Date of payment.
 - b. Amount of payment.
 - c. Purpose/Reason for payment.
 - d. Source of funds for payment.
8. List any real estate you and the alleged cohabitant own or have owned together or had joint interest in over the past two years. This includes deeds, leases, operating agreements, or any documents where either of you is a co-signor or guarantor. Attach all documents and explain how each interest was acquired.
9. Describe any loans or borrowings taken or given between you and the alleged cohabitant in the past two years, including the date, amount, purpose or reason, funding source, repayment schedule, interest rate, and current status. Attach documents that verify each loan or borrowing and its repayment.
10. Describe any business interests and/or joint ventures you and the alleged cohabitant have shared in the past two years, including the formation date, ownership shares, capital contributions, and sale status. Attach any relevant formation and/or sale documents.
11. List all credit and debit cards you have been authorized to use in the past two years, including store credit cards and state whether the alleged cohabitant is authorized or has used the card(s). Include the names of other people who use

these accounts and anyone who contributes to paying the bills.

12. Have you and the alleged cohabitant jointly accessed or owned any financial accounts in the past two years, such as bank accounts, investment accounts, retirement accounts, life insurance policies, cryptocurrency, or payment platforms? If so, provide the dates of shared access or ownership, the funding source for each account, and attach account statements from the period when access or ownership was shared.

13. In the past two years, have you been named, or have you named the alleged cohabitant as a beneficiary on any accounts either of you hold?

14. If yes, provide details about each account and attach statements covering the duration of the beneficiary designation.

15. In the past two years, have you and the alleged cohabitant shared access or responsibility, or been guarantors for any debts, such as credit cards, mortgages, lines of credit, student loans, personal loans, financing agreements, or automobile loans? If so, list the dates of shared responsibility, how each debt was funded, and attach statements from the period when you shared this responsibility.

16. In the past two years, has the alleged cohabitant had the ability to sign or withdraw from any of your accounts, or have you had these abilities on any of their accounts? If yes, list the accounts and how long these abilities were in effect.

Shared/Joint Responsibility for Living Expenses

17. Describe the activities (including but not limited to trips, concerts, and events) you and the alleged cohabitant have done together in the past two years. Include groups, clubs, and memberships you both belong to together or separately. Explain how often these activities occur and how you manage or split the costs for these activities.

18. Describe how often you have had meals with the alleged cohabitant (daily, weekly, monthly) in the past two years. Include where these meals usually take place (at home or in a restaurant), how you handle the costs, who usually pays or if you share the expenses, and any specific arrangements for splitting the cost. For meals eaten at home, describe who prepares the food and who pays for the food, and if this responsibility changes.

19. List all entertainment and activities that you and the alleged cohabitant participated in together in the past two years that cost more than \$50 and explain how the expenses were paid.

20. In the past two years, has anyone besides yourself contributed to your expenses? If so, provide details on the amount, how often these contributions are made, and who provides them.

21. In the past two years, list any services, contracts, insurance policies, or registrations (voter, tax, automobile) where the alleged cohabitant used your address, or where you have used their address.

22. List all streaming services you are subscribed to or have had access to in the past two years. Identify all people who have access to these services and whether they share your account, or you share their account. Specify who pays for each service.

23. List all transportation accounts (toll or parking payment accounts and rideshare services) you have or have had access to in the past two years. Identify all people authorized to use these accounts and whether they share your account, or you share their account. Specify who pays for each account.

24. Has anyone helped you pay your housing costs? This includes utilities, property taxes, rent, mortgage or expenses for repair, maintenance, or lawn care. If yes, identify the person, the dates, and the amounts.

25. Have you been a beneficiary of any life insurance policy, annuity, or retirement plan by the alleged cohabitant? If yes, provide the policy name and number, type, date you were added as beneficiary, policy start date, death benefit amount, and who pays the premiums.

26. Is the alleged cohabitant a beneficiary of yours on any life insurance policy, annuity, or retirement plan? If yes, provide the policy name and number, type, date they were added as beneficiary, policy start date, death benefit amount, and who pays the premiums.

27. In the past two years, have you named the alleged cohabitant in any legal documents prepared for you, including drafts, such as a Last Will and Testament, Power of Attorney or Health Care Directive? If yes, identify the legal documents and their interest or role.

28. In the past two years, have you been named in any legal documents prepared for the alleged cohabitant, including drafts, such as a Last Will and Testament, Power of Attorney or Health Care Directive? If yes, identify the legal documents and your interest or role.

Recognition of the Relationship Within Social and Family Circles

29. List all instances when you have proposed engagement or marriage or received a marriage proposal, including the other person's name and the approximate date.

30. Provide details about your social media interactions with the alleged cohabitant in the last two years, including:

- a. List all social media platforms where you and the alleged cohabitant have accounts. Include usernames or IDs for each platform.
- b. On each platform listed in subpart a above, indicate whether you and the alleged cohabitant follow each other, friend or connect with each other, or subscribe to each other's posts.
- c. For each platform listed in subpart a above, identify any family members or friends of the alleged cohabitant that you follow or who follow you, are connected to you as friends, or whose posts you subscribe to. Provide their usernames or IDs.

31. If you have children under 18, list all people who have transported them to or from school in the last two years and all people authorized to pick them up or are listed as emergency contacts.

32. Have you introduced the alleged cohabitant to any of your family or friends? If so, list each person and when the introduction happened, along with anyone else present during the introductions.

33. In the past two years, have you and the alleged cohabitant attended any celebrations together (including but not limited to graduations, birthdays, weddings)? If yes, list each event, the location, and the approximate number of attendees.

34. In the past two years, list any public announcements of your relationship with the alleged cohabitant to family, friends, social circles, or your community. Provide copies of any recordings or documents, including social

media posts, emails, invitations, or religious events.

35. Describe any medical appointments that you and the alleged cohabitant attended together in the past two years. Include the date and nature of each appointment, and state if the alleged cohabitant has been listed as your emergency contact for medical purposes.

36. Describe any medical appointments the alleged cohabitant attended with your children or where you attended the alleged cohabitant's children's medical appointments in the past two years. Include the date and nature of each appointment, the name of the health care provider and facility, and the reason for attending.

37. Describe all vacations or instances where you and the alleged cohabitant spent at least one night away from your residence, you and the alleged cohabitant took together or stayed in the same geographical area in the past two years, including payment details (who paid, how was it paid, and how were expenses divided).

38. Set forth any hotel, motel, timeshare, or any vacation rental properties, where you and the alleged cohabitant spent at least one night together in the past two years, including the location, date(s), and length of stay.

39. List all school and extracurricular events involving your children that the alleged cohabitant attended in the past two years, and events involving the alleged cohabitant's children that you attended, including parent-teacher conferences, back to school nights, child study team meetings, proms, graduations, shows, recitals, ceremonies, or sporting events.

40. List all holidays you and the alleged cohabitant spent together in the past two years and include the location, attendees, and holiday meals you had together, even if other people were present.

41. List all days in the past two years when the alleged cohabitant was alone with your children or pets to supervise or care for them.

42. List all gifts exchanged between you and the alleged cohabitant or their relatives in the past two years, including the gift, its value, date of exchange, and relationship of the person involved.

Living Together, Frequency of Contact, Duration of Relationship, Other

Indications of Mutually Supportive Relationship

43. List all overnights you and the alleged cohabitant spent together in the past two years and include locations.

44. Describe how often and by what methods you and the alleged cohabitant communicate.

45. In the past two years, have you used any home security/monitoring systems? If so, list all details including who had access.

46. List all people who have access to your residences (key, key code, security information) and include when access was granted.

47. List all times the alleged cohabitant stayed at your residence(s) without you in the past two years and note if children were present, and their relationship to the parties or the alleged cohabitant. Also list the times you stayed at the alleged cohabitant's residence(s) without them and note if children were present, and their relationship to the parties in this case or the alleged cohabitant.

Sharing Household Chores

48. Describe any repairs, maintenance, renovations, or chores the alleged cohabitant did at your residence, or you did at theirs, including how often.

49. Describe any lawn maintenance, gardening, or snow removal the alleged cohabitant did at your residence, or you did at theirs, including how often.

Recipient Has Received a Promise of Support from Another Person

50. List all written or verbal promises of support you made or received from the alleged cohabitant and attach copies of all related communications.

51. If you provide support to anyone, provide their name, address, relationship to you, amount, and frequency of payments, if it is voluntary or court-ordered, and any other details.

52. State the date and time these interrogatories were completed and the names of anyone who helped answer them.

CERTIFICATION

I hereby certify that the foregoing answers to interrogatories are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED:

SIGNED:

Note: Adopted pursuant to R. 4:17-1(c) July 31, 2025 to be effective September 1, 2025.