

MANDATORY DISCLOSURE AND PRODUCTION

As provided in §25-32 of the Connecticut Practice Book, the above named Defendant requests the Plaintiff produce the following documents. Compliance with this request shall be made within 30 days of the date of motion:

1. All federal and state income tax returns (including all schedules attached thereto) filed within the last three years, including personal returns and returns filed on behalf of any partnership or closely held corporation of which a party is a partner or shareholder.
2. All IRS forms W-2, 1099 and K-1 within the last three (3) years including those for the past year if the income tax returns for that year have not been prepared.
3. Copies of all pay stubs or other evidence of income for the current year and the last pay stub from the past year.
4. Statements of all accounts maintained with any financial institution, including banks, brokers and financial managers, for the past 24 months.
5. The most recent statement showing any interest in any Keogh, IRA, profit sharing plan, deferred compensation plan, pension plan, or retirement account.

6. The most recent statement regarding any insurance on the life of any party.
7. A summary furnished by the employer of the party's medical insurance policy, coverage, cost of coverage, spousal benefits, and COBRA costs following dissolution.
8. Any written appraisal concerning any asset owned by either party.
9. Check registers for all checking accounts in your name solely or jointly with other from January 1, 1999 to date.
10. A sworn Financial Affidavit in accordance with §463 of the Connecticut Practice Book, which affidavit must comply with Form 501.1 of the Connecticut Practice Book.

Such duty to disclose shall continue during the pendency of this action should a party appear. This rule shall not preclude discovery under any other provisions of these rules.