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IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED
SEP 12 2016

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

IN RE THE MARRIAGE OF:

[Redacted Name]

Petitioner,

and

[Redacted Name]

Respondent.

Case No. [Redacted]

[Redacted]

[Redacted]

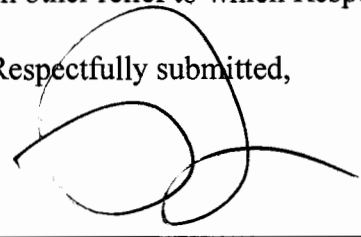
MOTION TO COMPEL DISCOVERY RESPONSES

COMES NOW the Respondent, [Redacted] by and through her attorney Richard J. Eagleton of Eagleton, Eagleton & Harrison, Inc., and hereby moves for an Order compelling Petitioner, [Redacted] to comply with the written discovery requests served upon him by Respondent to the Oklahoma Discovery Code, 12 O.S. Section 3224 et seq. In support hereof Petitioner shows the Court as follows:

1. Respondent's Combined First Interrogatories and Requests for Production of Documents and Tangible Things (attached as Exhibit "A") were served on Petitioner via facsimile and first class mail in care of his attorney of record, on August 5, 2016.
2. The Petitioner's responses were due on September 7, 2016, but they were not served.
3. Counsel have conferred, in good faith, regarding Petitioner's delivering discovery responses by telephone conference, but have not reached agreement.
4. Respondent seeks the Court's order requiring Petitioner's responses to Respondent's interrogatories and requests for production of documents.

WHEREFORE, Respondent prays for an order compelling interrogatory answers and production as set forth above and granting such other relief to which Respondent may be entitled.

Respectfully submitted,



Richard J. Eagleton, OBA #13272
Stephanie A. Horton, OBA #19834
EAGLETON, EAGLETON & HARRISON, INC.
320 South Boston Ave., Suite 1700
Tulsa, OK 74103-4706
(918) 584-0462
(918) 584-3724 FAX

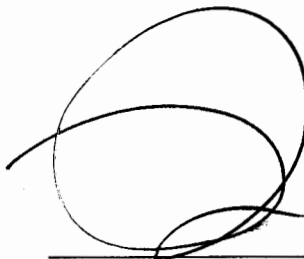
ATTORNEYS FOR RESPONDENT

████████████████████

CERTIFICATE OF SERVICE

I, the undersigned certify that on the 12 day of September, 2016, a true and correct copy of this instrument was sent via facsimile and U.S. Mail with proper postage prepaid thereon addressed to the attorney for Petitioner:

Kevin T. Gassaway, Esq.
Anna J. Brooks, Esq.
1646 South Denver Ave.
Tulsa, OK 74119-4233
Facsimile No. (918) 592-1800

A handwritten signature in black ink, consisting of several overlapping loops and curves, positioned above a horizontal line.

Attorney for Respondent

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

IN RE THE MARRIAGE OF:)

[REDACTED])

Petitioner,)

Case No. [REDACTED]

and)

[REDACTED])

Respondent.)

**RESPONDENT'S COMBINED FIRST
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS**

COMES NOW Respondent, [REDACTED] by and through her undersigned counsel of record, and propounds the following Combined First Interrogatories and Requests for Production of Documents and Tangible Things upon Petitioner [REDACTED]

I. INSTRUCTIONS

1. These discovery requests are intended to ascertain information not only in the possession of the Petitioner, individually, but also contained in records and documents under his control or in the possession of others and available to them.

2. These discovery requests shall be deemed continuing pursuant to the provisions of 12 Okla. Stat. § 3226, and require the supplementation of answers if additional information is acquired, but not later than thirty (30) days after such additional information is acquired.

3. In the event that you object to any Request made herein or decline to produce certain documents required by any Request on the basis of any privilege, or that such documents constitute trial preparation materials subject to the work-product doctrine, you shall identify in your response all such documents by providing the following information: (a) the date the

[REDACTED]

document was prepared; (b) the person who prepared or authored the document; (c) to whom the document was sent or directed, and any copies or duplicates thereof; and (d) the factual basis supporting your claim of privilege or work product doctrine.

4. The responses to the Requests for Documents shall include such information, documents and things as are within the custody, possession or control of the Petitioner, or are within the custody, possession or control of any of the Petitioner's consultants, accountants, attorneys or other agents, or which are otherwise available to the Petitioner. In responding to these Requests, the Petitioner is specifically instructed to review the personal files, records, notes, correspondence, daily calendars and telephone logs or records of all persons who have knowledge of the information inquired about in the Requests.

5. The documents produced shall be produced as they are kept in the usual course of business, or each document produced shall be specifically identified with the specific Request to which it is responsive. The documents shall be produced in a form which renders them susceptible to copying.

II. DEFINITIONS

1. "You," "your" and/or "Petitioner" shall refer to the above-named Petitioner and/or his respective servants, employees, private investigators, agents and representatives and all other persons acting on behalf of or purporting to act on behalf of Petitioner.

2. To "identify" a document means give the type of document (*e.g.* letter, memorandum, e-mail, electronic computer file, telegraph, report, etc.), date, addressee, file number and/or identifying symbol, and name and address of its custodian.

3. "Person" shall refer to any individual, corporation, limited liability company, firm, partnership, association, joint venture, or organization or entity of any type.

4. "Writing" or "document" shall refer to any written, recorded or graphic material or matter, whether typed, handwritten or printed, and whether a photograph, photostat, microfilm or produced, reproduced or stored on paper, cards, tapes, belts or computer devices or any other medium in your possession, custody or control or known by you to exist, and includes without limitation all originals, copies of originals and prior drafts of each letter, correspondence, memorandum (inter- or intra-office, as well as any other type), note, e-mail or digital or electronic file, telegram, message, text message, report (such as reports of telephone conversations), circular, release, article, analysis, summary, diary, record, brochure, contract, agreement, computer printout, table, chart, graph, schedule, book, journal, ledger, check and other similar instrument, minute, purchase order and/or sale confirmation, invoice, monthly statement, account, photograph, negative, film (whether developed or undeveloped), film strip, magnetic or other recorded tape and transcription.

5. "Communicate" and "communication" shall mean every manner or means of disclosure or transfer or exchange of information, whether orally, by document, electronic or computer transmission, or otherwise.

6. To "identify" any entity other than an individual means to state the name of the entity, the type of entity, list of officers, directors, principals or other owners or managers, as applicable, and present or last known address.

7. To "identify" an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, employer, title and position at the time in question. If the individual is anticipated to be a witness at the trial of this action, please provide a very brief summary of his or her anticipated testimony. If the individual is or was your employee, also state his or her job title and areas of responsibility.

8. The terms "relate to" or "relating to" are used in their broadest sense and shall mean to refer to, discuss, involve, reflect, deal with, consist of, represent, constitute, emanate from, be directed at or in any way pertain, in whole or in part, to the subject.

9. The term "business entity" shall refer to any corporation, partnership, joint venture, company, firm or other business entity of which you own at least an interest, excluding corporations whose stock is traded over-the-counter or on an exchange.

III. INTERROGATORIES

Pursuant to 12 Okla. Stat. § 3233, Respondent submits the following Interrogatories to Petitioner, to be answered in writing, under oath, within thirty (30) days from the date of service of these Interrogatories.

INTERROGATORY NO. 1: Identify all assets owned by you, your spouse or the two of you together at any time since January 1, 2011, whether the assets are real, personal, tangible, intangible or mixed, and state as to each asset the following:

- a. Description of the asset;
- b. Location of the asset;
- c. Fair market value of the asset as of the date of the filing of this action and as of the date of your answer to these Interrogatories;
- d. Formula or criteria by which you established the fair market value of the asset;
- e. Date the asset was acquired;
- f. Acquisition cost of the asset;
- g. Whether the asset is your separate property or jointly acquired as that term has been interpreted in construing 43 Okla. Stat. § 121 and its predecessor statute;

h. If any such asset is in your separate property, state the basis for your determination of each item as such; and

i. The identity of any asset you have sold or disposed of or encumbered (*e.g.* sale, gift, transfer, security interest, pledge or mortgage, etc.) since January 1, 2011, then state with respect to each such asset:

- (i) Its description;
- (ii) To whom it was sold or transferred;
- (iii) To whom it was encumbered;
- (iv) The date it was encumbered;
- (v) The date of such sale or transfer;
- (vi) The consideration received, if any;
- (vii) What was done with the proceeds; and
- (viii) To whom it was encumbered and to secure what amount of money, and what was done with the proceeds.

NOTE: Household furniture, appliances and goods in the possession of the Petitioner may be listed as one asset.

INTERROGATORY NO. 2: For each pension or retirement plan, stock ownership plan, profit sharing plan, 401(k) account, individual retirement account ("IRA"), defined benefit plan, defined contribution plan or other deferred income plan, program or account of which you are or were a participant during your marriage, regardless of whether your rights have "vested," identify the following:

- a. The formal name or title of the plan, program or account;
- b. Your account number;
- c. The name, address and telephone number of the administrator for the plan, program or account;

d. The value of such plan, program or account as of the date of your marriage, as of the date of the filing of this action, and as of the date of your answer to this Interrogatory; and

e. The amount of contributions, if any, made to the plan, program or account by you or your employer during your marriage.

INTERROGATORY NO. 3: As to each debt owed by you, your spouse or the two of you jointly on the date of the filing of this action and/or the date of your answer to this Interrogatory, state the following:

a. The date it was incurred;

b. The name of the creditor and account number;

c. The original principal balance and the current balance owed;

d. The balance owed as of each of the above-referenced dates;

e. The amount of accrued interest through the date of your answers to these

Interrogatories;

f. The monthly or other periodic payment required, stating what period of payment; and

g. The security for the debt, if any.

INTERROGATORY NO. 4: State the total amount of money you anticipate receiving for the 12 months commencing the date of the filing of this action from all sources, specifying with respect to such money:

a. The name of each source of such money (the entity) and the form in which it was or is to be paid (*e.g.* dividends, salary, bonus, interest, commissions, sales, fees, referral fees, etc.); and

b. The amount of such money you received or expect to receive in each month during the period.

INTERROGATORY NO. 5: Identify all banks, savings and loan associations, stock brokerage firms, investment houses or other financial institutions with which, you, your spouse or the two of you together have an account or have had an account since January 1, 2011, identifying in each instance:

- a. The name and address of the office or branch;
- b. All account numbers; and
- c. The name of the person or persons with whom you dealt there.

INTERROGATORY NO. 6: For each person or entity which holds an asset in his/her or its name or in his/her or its possession for your benefit, identify:

- a. The asset;
- b. The name of the person or entity and his/her or its address; and
- c. The value and location of the asset.

INTERROGATORY NO. 7: For each asset of which you hold title in any name other than your given name, identify:

- a. The asset;
- b. The name by which you hold title; and
- c. The value and location of the asset.

INTERROGATORY NO. 8: Identify all fringe benefits or perquisites of every nature received by you since January 1, 2011 from any corporation or other entity, including a limited liability company, in which you have an interest or by which you are or were employed on any basis, stating the amounts paid for the same, including but not limited to travel expenses,

entertainment expenses, automobile expenses, insurance, mileage expenses or reimbursement, etc.

INTERROGATORY NO. 9: Identify the amount, source and nature of all income received by you from all sources in tax years for which you have not filed federal or state income tax through the present for which returns may not already be due. Such information shall include wages, bonuses, commissions, salary, fees, referral fees, dividends, interest income, payments pursuant to a division order, royalties, distributions, advances, etc. In this regard, itemize, by date, the amount of tax payments you made (or made by any entity over which you have control), such as tax due, penalties, interest, quarterly payments, withholdings and the like.

INTERROGATORY NO. 10: Identify all depreciable assets (*e.g.* improved real property, equipment, automobiles, etc.) of any business entity, as defined in Section II of these discovery requests, stating with respect to each the following:

- a. Cost of such asset;
- b. Depreciation taken on such asset; and
- c. Fair market value of such asset as of the date of the filing of this action and/or the date of your answer to this Interrogatory, stating with respect to the latter, how you arrived at the fair market value of such asset (*e.g.* appraisal or personal opinion).

INTERROGATORY NO. 11: Set forth the following as to the business entity, as defined above, in which you have or had an interest at any time in the ten years preceding the date of these requests:

- a. Name of the entity and the type of organization, *e.g.* corporation, partnership, limited liability company, etc.;

b. A description of your interest, *e.g.* if a corporation, number of shares; if a partnership, percentage partnership interest;

c. Your interest and your spouse's interest as a percentage of all interest outstanding, *e.g.* 10 shares out of 100 shares outstanding, 10%;

d. The date of your acquisition of your interest or any part thereof and the consideration given for the same;

e. If you and/or your spouse are an officer, managing partner, member, or employee of a business entity, state your and your spouse's positions and annual salaries;

f. If your salary and your spouse's salary or positions as an officer, employee, member, or managing partner have changed in the past five years, set forth the same;

g. Specify with particularity all expenses for which a business entity pays or has paid on your behalf and/or your spouse's behalf or for which you and/or she are reimbursed;

h. Set forth your and your spouse's capital contributions to the business entity;

i. If you have borrowed or loaned money from or to the business entity, list the dates of each such transaction, amount of money involved in the transaction and balance currently due;

j. With respect to any such loans or borrowings, state the balance owed as of the date of the filing of this action and/or the date of your answer to this Interrogatory;
and

k. With respect to each loan and borrowing identified in answer to subparagraph (i) above, state the periodic amortization obligation.

INTERROGATORY NO. 12: Identify by date and the name of the parties all written agreements between you or your spouse and each business entity or between you and the other shareholders, members, or partners, including such agreements as govern rights to sell or buy ownership interests and at what price, *e.g.* operating agreements and/or “buy-sell” agreements.

INTERROGATORY NO. 13: Identify all safe deposit boxes you have had or used since January 1, 2011, specifying as follows:

- a. The location of each box or other depository;
- b. The name or names in which each box is registered;
- c. The date of initiation or termination of each;
- d. The present contents of each box or depository;
- e. The identity of the contents removed since January 1, 2006; and
- f. The reason for the removal of any of the contents since January 1, 2006;

and, if sold, on what date, what amount was received, and the name and address of the party to whom sold.

INTERROGATORY NO. 14: Identify and describe separately and in detail all expenditures (including gifts) you have made since January 1, 2015 through the date of your answers to these Interrogatories, which in the aggregate value as to each person exceeds \$200, specifying with respect to each expenditure or gift:

- a. The date of each expenditure or gift;

b. To or for whom the expenditure or gift was made, stating the person's name, address and all telephone numbers you have used to contact such person at any time from and after January 1, 2015;

c. Of what the expenditure or gift consisted, *e.g.* money, tangible asset, payment, debt payment; and

d. The amount of each expenditure or gift.

You may exclude such gifts made to blood relatives and their spouses, your spouse, and your children.

INTERROGATORY NO. 15: Identify all providers of service accounts in which you have instant message, text message, wireless or e-mail computer access and provide account passwords or pass codes you have used since January 1, 2011.

INTERROGATORY NO. 16: State your income and average monthly living expenses in accordance with the Temporary Order Financial Declaration worksheet attached hereto as "Exhibit A."

INTERROGATORY NO. 17: Describe the details (monthly premium, co-pay, deductible, coverage, etc.) of medical insurance coverage under which you, your spouse and/or the minor children are currently covered, and all available to you as a parent for your minor children, similar details with respect to such insurance, and the monthly cost of same to you, including but not limited to insurance which is available to you through an employer, union, professional association, fraternal organization or other group.

INTERROGATORY NO. 18: List all policies of insurance in effect on the date of the filing of this action and/or the date of your answer to this Interrogatory of which you are the owner, specifying with respect to each such policy the following:

- a. Name of company;
- b. Type of insurance, e.g. life (ordinary or term), property, casualty, etc.;
- c. Policy number;
- d. Beneficiary on the date of the filing of this action and as of the date of your answers to these Interrogatories;

- e. Face value and coverage;
- f. Cash value; and
- g. Loans.

If you have changed any beneficiary designations since the filing of this action, please describe the full details of such change and whether the same was in violation of the Automatic Temporary Injunction Notice of the Court.

INTERROGATORY NO. 19: Describe all post office boxes you have rented (or are renting) under your name or an alias, or on behalf of another person, since January 1, 2011, providing the following information:

- a. Address of the post office box;
- b. Date it was rented;
- c. Purpose for which it was/is rented; and
- d. Name under which it was/is rented.

INTERROGATORY NO. 22: Identify the dates (date ranges), destination and purpose of all out of town travel you have taken since January 1, 2011.

INTERROGATORY NO. 23: Identify all persons or entities you have contacted regarding caregiving, e.g. nanny service for the Minor Child should she temporarily or permanently relocate to Texas.

INTERROGATORY NO. 24: Identify by name, address, and telephone number any individual connected with your employment who advised, recommended or instructed you to relocate to Texas. Describe the details of each such communication and, if the same was in writing, identify the same by author, date, and means (e.g. text, e-mail, letter, memorandum).

INTERROGATORY NO. 25: Identify all addresses, telephone numbers and e-mail addresses you have for the following:

- a. Sonny McCutcheon;
- b. Paul Farrell;
- c. Scott Barger;
- d. Bill Sisco;
- e. Scott Randolph; and
- f. Suzanne Meeks.

INTERROGATORY NO. 26: Identify all employment (including other enterprise for which you dedicated your labor even if not a W-2 employee) in which you have engaged during your marriage to Respondent.

INTERROGATORY NO. 27: Identification of and explanation of any transfers of liquidation of funds or investments, including from one account to another, or withdrawals of funds from any account in excess of \$2,500 from and after January 1, 2015.

IV. REQUESTS FOR PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS

Pursuant to 12 Okla. Stat. § 3234, Respondent submits the following Requests for Production of Documents and Tangible Things to Petitioner to be answered in writing, under oath, within thirty (30) days from the date of service of these Requests for Production of Documents and Tangible Things.

REQUEST NO. 1: All documents, *e.g.* paychecks or pay stubs, evidencing all income from labor and distributions from any business, including any in which you have an interest, from and after January 1, 2011, including draws, loans, salary, bonuses, dividends, royalties or other.

REQUEST NO. 2: All documents evidencing title to assets owned by you, your spouse, the two of you together or any business entity over which you have control, at any time since January 1, 2011, including but not limited to the following:

- a. Deeds;
- b. Certificates of deposit;
- c. Bank account statements;
- d. Stock certificates;
- e. Brokerage statements;
- f. Certificates for securities, *e.g.* shares of stock in your physical possession;
- g. Shareholder/partnership/limited liability company agreements;
- h. Retirement account/pension/IRA/401(k) statements;
- i. Trusts; and
- j. Copyrights or trademarks.

If you maintain any such assets are in part or in whole your separate property as that term has been interpreted in construing 43 Okla. Stat. § 121 and its predecessor statute, provide all documents such as deeds, transaction records, or other, as would identify same as separate and, if applicable, as would trace such asset to a separate asset.

REQUEST NO. 3: All notes or other evidence of all indebtedness currently owed by you, your spouse, the two of you together or any business over which you have control, together

with all security agreements and mortgages or other security instruments taken as security for such indebtedness.

REQUEST NO. 4: All documents evidencing the balance of each indebtedness requested above as of the date of the filing of this action and the date of your answers hereto (e.g. credit card statements, mortgage statements, amortization schedules reflecting outstanding principal balance information, etc.).

REQUEST NO. 5: All individual or business entity federal and state income tax returns for the last five (5) years.

REQUEST NO. 6: All fiscal year-end balance sheets, profit and loss statements and general ledgers prepared for any business entity for the years 2011, 2012, 2013, 2014, and 2015, and monthly balance sheets, profit and loss statements and general ledgers for the period January 2016 through the present.

REQUEST NO. 7: Personal financial statements which have been prepared by you or for you at any time since January 1, 2011, and such statements during said period which were submitted to any bank, financial institution, or potential landlord by you or on your behalf.

REQUEST NO. 8: All life insurance policies owned by you or your spouse, including documents reflecting the accumulated interest and dividends, cash value, annual premiums and the amount of any loans thereon and which reflect changes in beneficiary.

REQUEST NO. 9: The monthly bank statements, cancelled checks (if copies provided, front and back of checks), deposit slips and check registers for all accounts on which you are a signatory, whether said account is held in your name or not, since January 1, 2011.

REQUEST NO. 10: All documents evidencing the value of each asset in which you, your spouse, the two of you together or any business interest over which you have control own an

interest as of the date of the filing of this action, or the closest date for which such information is available (*i.e.* appraisals, account statements from banks or other financial institutions, etc.)

REQUEST NO. 11: The monthly statements on all brokerage accounts, money market accounts or other financial accounts, etc. on which you are a signatory or into which funds have been deposited by you, your agents or your representatives, whether said accounts are held in your name or not, since January 1, 2011.

REQUEST NO. 12: All universal credit card monthly statements (*e.g.* MasterCard, VISA, Diner's Club, American Express, etc.) on which you are a signatory, whether said accounts are held in your name or not, since January 1, 2011.

REQUEST NO. 13: All documents which show the balance as of the date of the filing of this action and the date of your answer to this Interrogatory of your IRA's, 401(k)'s, pension or profit sharing plans, defined benefit plans, defined contribution plans or other deferred income plan or program, *e.g.* stock option plan of which you were or are a participant, together with the documents describing such plans, *e.g.* booklets, summaries, etc.

REQUEST NO. 14: All wills and trust documents including amendments, executed by you or on your behalf during marriage.

REQUEST NO. 15: All schedules which support a depreciation deduction on your joint personal and any business entity U.S. income tax return requested herein.

REQUEST NO. 16: All agreements you have with any business entity and/or shareholder, partner, member or other owner, etc. of any business entity.

REQUEST NO. 17: Copies of all writings or documents, as defined at Paragraph 4 of Section II Definitions, above, including correspondences of every nature, to or from the following individuals:

- a. Paul Farrell;
- b. Scott Barger;
- c. Bill Sisco;
- d. Suzanne Meeks;
- e. Sonny McCutcheon; and
- f. [REDACTED]

on any of the following topics:

- a. alcohol use of Respondent;
- b. issues relating to any intervention or substance abuse treatment of Respondent;
- c. relocation from Tulsa to Houston;
- d. activities, schooling, and living arrangements upon relocation to Houston;
- e. temporary or permanent issues or rights relating to a divorce action against your wife, whether or not said documents or writings are dated prior to this action being filed.

REQUEST NO. 18: Documents or writings relating to potential caregiving, housing and schooling of [REDACTED] once in Houston.

REQUEST NO. 19: Calendars, journals, or other records reflecting all out of town travel you have taken since January 1, 2011.

REQUEST NO. 20: All loan and lease applications you have prepared since January 1, 2011.

REQUEST NO. 21: Copies of all documents upon which you relied in supplying, or which support, the information you provided pursuant to the foregoing Interrogatory requesting the listing of your income and average monthly living expenses.

REQUEST NO. 22: All purchase records, contracts and monthly or periodic statements, such as billing statements, since January 1, 2011, reflecting details of all wireless telephones and calling or prepaid phone cards, including incoming and outgoing telephone calls, whether paid by your employer or by you. For land phones, produce statements reflecting all long distance calls.

REQUEST NO. 23: Your daily journals for January 1, 2013 through the present.

REQUEST NO. 24: Produce all documents or writings relating to any of the foregoing

Interrogatories and Requests for Production of Documents.

Respectfully Submitted,

EAGLETON, EAGLETON & HARRISON, INC.

By: 

Richard J. Eagleton, OBA No. 13272

Stephanie A. Horton, OBA No. 19834

320 S. Boston Avenue - Suite 1700

Tulsa, OK 74103-4706

Telephone: (918) 584-0462

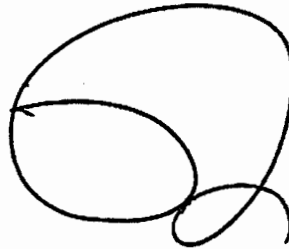
Facsimile: (918) 584-3724

Attorney for Respondent

CERTIFICATE OF SERVICE

I, the undersigned certify that on the 5th day of August, 2016, a true and correct copy of this instrument was sent via facsimile and U.S. Mail with proper postage prepaid thereon addressed to the attorney for Petitioner:

Kevin T. Gassaway, Esq.
Anna J. Brooks, Esq.
1646 South Denver Ave.
Tulsa, OK 74119-4233
Facsimile No. (918) 592-1800

A handwritten signature in black ink, consisting of several overlapping loops and a trailing flourish.

ATTORNEY FOR RESPONDENT

**AVERAGE MONTHLY LIVING EXPENSES
EXHIBIT "A"**

Description of Expenses	Monthly <i>Average</i> of Your Expenses	Monthly <i>Average</i> with Child
1. Rent or Mortgage Payment	\$	
2. Home Repairs or Maintenance		
3. Home Security System		
4. Homeowner's or Renter's Insurance Premiums Not Included in Rent or Mortgage Payments		
5. <i>Ad Valorem</i> Property Taxes Not Included in Mortgage Payment		
6. Cellular Telephone or Pager Bill		
7. Residential Telephone Bill		
8. Water Bill		
9. Natural Gas Bill		
10. Electric Bill		
11. Trash & Sewer Service		
12. Cable or Satellite TV Bill		
13. Internet Access		
14. Housekeeping Service		
15. Yard or Lawn Care		
16. Swimming Pool Service		
17. Clothing, Shoes and Accessories		
18. Household Cleaning Supplies		
19. Person Cleaning Supplies		
20. Laundry or Dry Cleaning		
21. Cosmetics		
22. Haircuts or Styling		

Description of Expenses	Monthly <i>Average</i> of Your Expenses	Monthly <i>Average</i> with Child
23. Automobile Payment		
24. Other Vehicle Payment		
25. Other Vehicle Payment		
26. Automobile Insurance		
27. Tax for Annual Automobile Tag		
28. Gasoline and Motor Oil, Fluids, etc.		
29. Automobile Repairs and Cleaning		
30. Dentist or Orthodontist Bills Not Reimbursed by Insurance		
31. Doctor's Bills Not Reimbursed by Insurance		
32. Counselors' Bills Not Reimbursed by Insurance (e.g. psychologist or psychotherapist)		
33. Hospital Bills Not Reimbursed by Insurance		
34. Medical Insurance Premium		
35. Dental Insurance Premium		
36. Payments for Drugs and Medications Not Reimbursed by Insurance		
37. Other Medically Related Therapy Bills Not Reimbursed by Insurance		
38. School Tuition		
39. School Lunches		
40. School Supplies (e.g. books, uniforms and other supplies)		
41. Other Lessons (e.g. dance, music, art, etc.)		
42. Transportation (e.g. airfare, bus fare, etc.)		

Description of Expenses	Monthly <i>Average</i> of Your Expenses	Monthly <i>Average</i> with Child
43. Life Insurance Premiums		
44. Entertainment		
45. Total of Minimum Monthly Payments on All Presently Outstanding Credit Card Balances		
46. Child-Related Extracurricular Activities (e.g. uniforms, equipment, fees, traveling expenses, etc.)		
47. Food and Groceries		
48. Other		
TOTAL	\$	

EAGLETON, EAGLETON & HARRISON

INCORPORATED

Attorneys and Counselors

William L. Eagleton (1860-1926)
William L. Eagleton, Jr. (1894-1982)
E. John Eagleton
Richard J. Eagleton
Charles D. Harrison
Stephanie A. Horton

320 South Boston, Suite 1700
Tulsa, Oklahoma 74103-4706
Facsimile: (918) 584-3724
Telephone: (918) 584-0462
e-mail: reagleton@eehlaw.com

Norma H. Eagleton
Of Counsel

Facsimile

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