

[Handwritten signature]



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

IN RE THE MARRIAGE OF)
)
 [REDACTED])
)
 PETITIONER,)
)
 and)
)
 [REDACTED])
)
 RESPONDENT.)

Case No. [REDACTED]

[REDACTED]

DISTRICT COURT
FILED
JAN 30 2017
DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

PETITIONER'S MOTION TO COMPEL DISCOVERY RESPONSES

COMES NOW the Petitioner, [REDACTED] by and through his attorneys of record, James R. Gotwals and Benjamin Aycock of JAMES R. GOTWALS AND ASSOCIATES, INC., and pursuant to 12 O.S. § 3237, and moves this Court for an Order compelling Respondent, [REDACTED] to respond to his discovery requests. In support thereof, Petitioner would show the Court as follows:

1. That on May 24, 2016, Petitioner's Discovery Requests were hand delivered to Respondent's counsel at the temporary order hearing held in this matter. A copy of the Discovery Requests are attached hereto marked as Exhibit "A".
2. That Respondent's responses would have been due on or about June 25, 2016.

3. That as of this filing, Respondent has not provided any responses to the Discovery Requests.

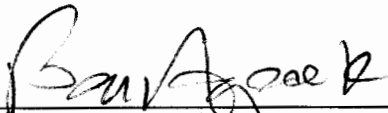

4. That pursuant to statute, Petitioner's counsel has had "good faith conferences" with Respondent's counsel, but no resolution has been reached and the responses are now more than seven (7) months past the original due date.

5. That pursuant to 12 O.S. § 3237(A)(2), Petitioner requests that this Court issue an order compelling Respondent to respond to the Discovery Requests by a date and time certain.

6. That "[c]ivil trials no longer are to be conducted in the dark. Discovery, consistent with recognized privileges, provides for the parties to obtain the fullest possible knowledge of the issues and facts before trial. 'The aim of these liberal discovery rules is to make a trial less a game of blind man's bluff and more a fair contest with the basic issues and facts disclosed to the fullest practicable extent.'" *State ex rel. Protective Health Services v. Billings Fairchild Center, Inc.*, 2007 OK CIV APP 24, 158 P.3d 484 (citations omitted).

7. That pursuant to 12 O.S. § 3237(A)(4) and 43 O.S. § 110, Respondent should be ordered to pay Petitioner's reasonable costs and fees associated with this motion and the prosecution thereof.

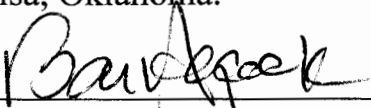
WHEREFORE PREMISES CONSIDERED, Petitioner prays for relief consistent with that requested herein, for his attorney's fees and costs, and for such other and further relief to which Petitioner may be entitled.


James R. Gotwals, OBA #3499
Benjamin Aycock, OBA #21472
JAMES R. GOTWALS & ASSOCIATES, INC.
525 South Main, Suite 1130
Tulsa, Oklahoma 74103-4512
Telephone: 918-599-7088
Facsimile: 918-599-7153
ATTORNEYS FOR PETITIONER,


VERIFICATION PURSUANT TO 12 O.S. §426

I state under penalty of perjury under the laws of Oklahoma that I am the attorney for the Petitioner in the above-entitled action; that I have read the above and foregoing *Petitioner's Motion to Compel Discovery Responses*; that I believe that the testimony and evidence at trial will prove the facts and matters therein set forth are true and correct.

Dated: January 30, 2017, in Tulsa, Oklahoma.

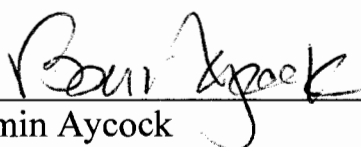

Benjamin Aycock

CERTIFICATE OF MAILING

I hereby certify that on this 30th day of January, 2017, a true and correct copy of the above and foregoing *Petitioner's Motion to Compel Discovery Responses* was mailed via First Class Mail, with the proper amount of postage affixed thereon, to:

Pamela Rains, Esq.
208 N. Main St.
Sand Springs, OK 74063
ATTORNEY FOR RESPONDENT





Benjamin Aycock

5-24-10 BJA CC

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

IN RE THE MARRIAGE OF

[REDACTED]

PETITIONER,

AND

[REDACTED]

RESPONDENT.

)
)
) CASE NO. [REDACTED]
)
) JUDGE: [REDACTED]
)
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)
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PETITIONER'S FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO RESPONDENT

TO: [REDACTED]
c/o Pamela Raines, Esq.
15 N. Main St.
Sapulpa, OK 74066-3901
ATTORNEY FOR RESPONDENT,
[REDACTED]

Petitioner, [REDACTED] pursuant to 12 O.S. §§ 3233 and 3234 requires the Respondent, [REDACTED] answer the following interrogatories and request for production of documents, fully and separately, under oath, and to serve a copy of said answers, along with the requested documents, upon Petitioner's counsel at the offices of JAMES R. GOTWALS AND ASSOCIATES, INC., 525 South Main Street, Suite 1130, Tulsa, Oklahoma 74103, not later than thirty (30) days from the date of receipt of this pleading.

I.

[REDACTED]

INSTRUCTIONS

1. These Interrogatories, Request for Production of Documents and Request for Admissions (collectively "Discovery Requests") are intended to obtain information and documents not only in the possession, custody and control of the Respondent but also contained in records and documents available to him.

2. These interrogatories shall be deemed continuing pursuant to the provisions of 12 O.S. § 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. The Discovery Requests propounded are of a continuing nature, and, in the event there is a change of conditions between the time of answering the above mentioned Discovery Requests and the time of trial of the above styled and entitled action, the Respondent will be expected to furnish to the Petitioner, prior to trial, amended Answers to such of the Discovery Requests as are indicated.

4. In the event that you object to any Discovery 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 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.

5. The singular shall include the plural and vice versa, and the conjunctive shall including the disjunctive and vice versa, in order to give these Discovery Requests the broadest scope.

6. The response to a document request shall include such information and documents as are within the custody, possession or control of the Respondent, (as defined herein), or are within the custody, possession or control of any of the Respondent's consultants, accountants, attorneys or other agents, or which are otherwise available to the Respondent. In responding to this document request, the Respondent 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 request.

7. 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.

8. If any document request herein cannot be complied with in full, it shall be complied with to the extent possible with an explanation as to why full compliance is not possible.

II.
DEFINITIONS

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

2. To "identify" a document, means give the type of document (*e.g.*, letter, memorandum, 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, 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, whether a photograph, photostat, microfilm, or produced, reproduced or stored on papers, 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 original, copies of originals, and prior drafts of each letter, correspondence, memorandum (inter- or intra-office as well as any other type), note, telegram, 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 or otherwise.

6. To "identify" an 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 the individual's full name, present or last known address, present or last known position and business affiliation, and 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 the witness' anticipated testimony. If the individual is or was your employee, also state the witness' 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 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 in which you own or control an interest other than corporations whose shares are traded on a national stock exchange.

INTERROGATORIES

INTERROGATORY NO. 1: State your full name, including any aliases or former names, date of birth, social security number, current address, and telephone number.

INTERROGATORY NO. 2: Identify all assets owned by you, your spouse, or the two of you together as of January 1, 2015, whether the assets are real, personal, tangible, intangible, or mixed, and state as to each asset the following:

- a. Description and location of the asset;
- b. Fair market value (FMV) of the asset as of the date of separation and the formula or criteria by which you established FMV of the asset;
- c. The date the asset was acquired;
- d. The cost of the asset;
- e. Whether the same is your separate property or jointly acquired as that term has been interpreted in construing 43 O.S. § 1991, 121 and its predecessor statutes;
- f. If any such assets are your separate property, state the basis for your consideration of the item as such;
- g. If you have sold or disposed of any of the above assets:
 - 1) its description;
 - 2) to whom sold or transferred; the date of such sale or transfer;
 - 3) the consideration received, if any; and
 - 4) what was done with the proceeds.
- h. What indebtedness is owed on or against the asset and to whom owed, if any.

(The terms assets when used herein shall also include but not be limited to: contract rights, any deferred compensation benefits in which you have a contingent or vested interest, pension or retirement

plans, IRA accounts, profit-sharing plans, tax deferred savings or thrift accounts, Keough or 401K plans, stock purchase programs, stock option purchase plans or incentive plans.)

NOTE: Household furniture, appliances, and goods in the possession of the Respondent may be generally listed as one asset unless they are in the nature of collectibles or antiques with known appraised values in which case they shall be set forth separately.

INTERROGATORY NO. 3: Identify any item of real and/or personal property owned as of the date the Petition was filed which you allege to be your separate property.

INTERROGATORY NO. 4: Identify any item of real and/or personal property owned as of the date the Petition was filed which you admit to be your spouse's separate property.

INTERROGATORY NO. 5: Identify any life insurance you or your spouse have, including the amount of benefits, the beneficiaries and the cash value currently and at the date of separation.

INTERROGATORY NO. 6: For each pension or retirement plan, 401(k) account, individual retirement account ("IRA"), defined benefit plan, defined contribution plan or other deferred income plan, award program or account of which you were a participant during your marriage, regardless of whether your rights therein have yet "vested" or remain contingent, identify the following:

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

- d. The balance of such plan, program or account as of the date of your marriage as well as its current balance;
- e. The amount of contributions, if any, made to the plan, program or account by you or your employer during your marriage;
- f. All documents, including plan booklets and account statements, which could provide the information requested in parts (a)-(e), above.

INTERROGATORY NO. 7: Identify all gifts or inherited property you have received, money you have received, debts which have been paid on your behalf or other financial benefit with a value exceeding \$500.00 you have been provided during the last twenty-four (24) months, by specifying:

- a. The date you received the gift(s) or inheritance, or money, or debt payment or other benefit;
- b. By whom the gift or inheritance, and/or money, or debt payment or other benefit was given stating the person's name, address, telephone number and relation to you; and
- c. What the gift or inheritance was, or the amount of the money given, or amount and nature of debt paid, or the nature of the benefit received.

INTERROGATORY NO. 8: Identify all banks, savings and loan associations, credit unions, stock brokerage firms, investment houses or other financial institutions with which you, your spouse, or the two of you together, have an account, or had an account, during the last twenty-four (24) months, identifying in each instance:

- a. The name and address of the office or branch;
- b. Style and type of account, (e.g., "John and Mary Smith, joint checking"); and
- c. All account numbers.

INTERROGATORY NO. 9: As to each debt currently owed by you, your spouse, or the two of you jointly, and each debt on which you are a co-obligor as of the date of your Answer to this interrogatory, please state the following:

- a. The date it was incurred;
- b. The name of the creditor and account number;
- c. The original principal balance, the balance at the date of separation and the current balance owed;
- d. The monthly or other periodic payment required, stating what period of payment;
- e. The security for the debt, if any; and
- f. The reason for the indebtedness.

INTERROGATORY NO. 10: Identify the amount, source, and nature of all income received by you from all sources during the last twenty-four (24) months (*e.g.*, wages, salary, commission, fees, retirement and/or social security benefits, referral fees, dividends, interest income, payments pursuant to a division order, royalties, distributions, excisable stock options, advances, etc.).

INTERROGATORY NO. 11: State the total amount of money you anticipate receiving for the next twelve (12) months commencing June 1, 2016, from all sources, specifying with respect to such money, the name of each source of such money and its character, (*e.g.*, dividends, salary, interest, commissions, sales, fees, referral fees etc.); and the amount of such money you expect to receive in each month during the period.

INTERROGATORY NO. 12: State your employment history, since completing your high school education, including the name of each employer, dates of your

employment for each employer named, nature of employment, duties of employment, and reason for leaving, through the date of your answers to these interrogatories.

INTERROGATORY NO. 13: Do you allege you are currently disabled or otherwise prevented from working full time? If so, please list the following:

- a. The nature of your disability;
- b. The date you were diagnosed or otherwise became aware of said disability;
- c. The name, address and telephone number of any treating physicians; and
- d. Whether you expect to return to full time employment in the next twelve (12) months.

INTERROGATORY NO. 14: Identify all places in which you have applied for full-time employment during the last twelve (12) months, including specifically the following: the name of the entity with whom you applied; the date of your application; and state whether you were offered employment.

INTERROGATORY NO. 15: State your average monthly living expenses in accordance with the form attached hereto as Exhibit "A."

INTERROGATORY NO. 16: Describe in full all medical treatment, including elective treatment or testing, you have received during the last thirty-six (36) months by providing the following:

- a. Exact date of treatment;
- b. Specific diagnosis (if applicable); and

- c. Name of medical provider, e.g. name of clinic or hospital and/or physician.

INTERROGATORY NO. 17: With regard to your request for support alimony in the Petition, state the amount of support alimony you are requesting to be awarded and the length of time you allege you will need support alimony.

INTERROGATORY NO. 18: State with particularity each and every reason or set of facts that support your allegations that you have a need for support alimony and that your spouse has an ability to pay support alimony.

INTERROGATORY NO. 19: Describe in detail your present plan and/or idea, if any, for improving your ability to support yourself following the divorce.

INTERROGATORY NO. 20: Have you, or has anyone acting on your behalf, recorded any actions or conversations, including but not limited to taking photographs, in which Petitioner was a participant during the last twenty-four (24) months? If so, specifically state the following:

- a. Date of recording or photograph;
- b. Identities of all persons recorded or photographed;
- c. Substance of recorded conversation;
- d. Present location of recordings or photographs; and
- e. Whether a transcript of such recording was prepared and, if so, transcript's present location and custodian.

INTERROGATORY NO. 21: Do you think that your minor children have a preference as to either custody or visitation in this case? If so:

- a. Identify what you think your children's preferences are;
- b. State your opinion as to how you think such preferences should be valued by the Court in making its decision (e.g., should be absolutely be followed, should not be followed, or any other description of your choosing).

INTERROGATORY NO. 22: Provide the names and addresses of all private investigators or other persons you have employed or otherwise engaged within the last twenty-four (24) months to investigate or conduct surveillance of your spouse.

INTERROGATORY NO. 23: Have you, at any time during the previous six (6) months, discussed any aspect of this divorce proceeding with the minor children, including but not limited to instances of Petitioner's personal conduct or behavior, or any of the adult issues between you and the Petitioner in this matter? If so, please identify the following:

- a. Date(s) of conversation(s) or contact;
- b. Any other person(s) participating in or privy to the conversation and their addresses and telephone numbers;
- c. The substances of the conversation by each person participating in the conversation; and
- d. Any documents or tangible things shown to the minor child including but not limited to notes, letters, recordings, photographs, etc.

INTERROGATORY NO. 24: Have you kept any diaries, journals, calendars, photographs, or other written record of any events which occurred during your

marriage to the Petitioner? If so produce all such documents.

INTERROGATORY NO. 25: Identify your proposed visitation/custodial schedule with the minor child, including holidays.

INTERROGATORY NO. 26: Identify each and every reason you believe you cannot share joint custody of your child with the Petitioner.

INTERROGATORY NO. 27: Please describe with specificity how you believe the best interest of the children will be served if you are awarded sole custody.

INTERROGATORY NO. 28: If you believe that your spouse is not a fit and proper person to be awarded custody of the minor child, please state each reason why, including but not limited to any specific acts or instances of Petitioner's personal behavior which you believe are evidence of bad parenting.

INTERROGATORY NO. 29: Do you think that your children are developing at satisfactory levels concerning their:

- a. Social development;
- b. Intellectual development; and
- c. Moral development?
- d. If your answer to any above subparagraph is in the negative, identify the subparagraph (A, B, and/or C) and state all your reasons for your thought that such development is not satisfactory, and state all your reasons for the cause of such unsatisfactory development.

INTERROGATORY NO. 30: Describe in detail your typical daily routine, including but not limited to what time you wake up, any job search activities, recurring appointments, scheduled activities, leisure time, employment, etc. In short, what do you typically do with your life from the time you wake up until the time you go to bed?

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: All documents evidencing title to assets owned by you, your spouse, or the two of you together, at any time since January 1, 2014, (e.g., deeds, titles, certificates of deposit, stock certificates, purchase receipts, appraisals, etc.), through the date of your responses to these Discovery Requests.

REQUEST NO. 2: All contracts and documents relating to the sale, lease, mortgage, financing, refinancing or other hypothecation of any asset owned by you, your spouse, or the two of you together, from and after January 1, 2014, through the date of your responses to these Discovery Requests.

REQUEST NO. 3: All notes or other evidence of all indebtedness currently owed by you, your spouse, or the two of you together, or on which you have co-signed, since January 1, 2014, through the date of your responses to these Discovery Requests, together with all security agreements and mortgages or other security instruments taken as security for such indebtedness.

REQUEST NO. 4: Your individual federal and state income tax returns for the

calendar years 2013, 2014, and 2015, complete with all attachments and schedules.

If any of these returns have not been prepared, please provide copies of all documents which reflect all income earned by you for that calendar year (e.g., W-2s, K-1s, 1099s, etc.).

REQUEST NO. 5: All policies of insurance presently in force 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.

REQUEST NO. 6: Bank statements, canceled 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(s) are held in your name or not, from and after January 1, 2014, through the date of your responses to these Discovery Requests.

REQUEST NO. 7: Statements of 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, from and after January 1, 2014, through the date of your responses to these Discovery Requests.

REQUEST NO. 8: Statements of all universal credit card 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, from and after

January 1, 2014, through the date of your responses to these Discovery Requests.

REQUEST NO. 9: All documents relating to any real property currently owned by you, your spouse, or the two of you together, including, but not limited to, loan agreements, mortgages, contracts for sale, appraisals, leases, invoices for repairs or improvements made and county tax assessments.

REQUEST NO. 10: Any statements prepared from and after January 1, 2014, through the date of your responses to these Discovery Requests, for any profit sharing, pension, and/or other deferred compensation plan or retirement plan, HR-10, Keogh, IRA, 401(k), etc. and any published summary thereof, of which you are a beneficiary, listing all policies of insurance, giving information including accumulated interest and dividends, cash value, annual premiums, and amount of any loans thereon.

REQUEST NO. 11: All financial statements prepared by you or your spouse, or caused to be prepared by you or your spouse, regardless of whether or not you or your spouse have ever given said document to any bank or financial institution, from and after January 1, 2014, through the date of your responses to these Discovery Requests.

REQUEST NO. 12: Copies of all documents which reflect income earned by you during the past twelve (12) months, including but not limited to pay check stubs, W-2's and/or other documents reflecting income received by you.

REQUEST NO. 13: Copies of all health care documents (insurance claims, medical, dental, mental health or other health care documents) in your possession or control which reflect any diagnosis, prognosis, opinion, charges and/or payment concerning you.

REQUEST NO. 14: Copies of all video and/or audio tape recordings, private investigation notes/reports/memoranda, surveillance logs, GPS maps/tracking sheets, etc., you have made, or caused to have been made, of the Respondent during the past twelve (12) months through the date of your responses to these discovery requests.

REQUEST NO. 15: All documents relating to any surveillance or investigation of your spouse performed by you, private investigators or other persons employed by you or otherwise acting on your behalf including surveillance reports and invoices or bills for such services.

REQUEST NO. 16: Complete the HIPAA Release form attached to these Discovery Requests for each health care provider identified in response to Interrogatory No. 16.

REQUEST NO. 17: Copies of all personal diaries, journals, calendars or other notes or memoranda which are descriptive of any activity, speech, event or conduct of either you or of Respondent which was written, for the period commencing January 1, 2014, through the date of your responses to these Discovery Requests.

REQUEST NO. 18: All documents reflecting the current "cash" or "surrender" value of each life insurance policy owned by you or your spouse.

REQUEST NO. 19: All documents identified in, or supporting your response to, Interrogatory No. 16.

REQUEST NO. 20: Copies of all documents upon which you relied in supplying the information you provided pursuant to the Interrogatory requesting identification of your average monthly living expenses (*e.g.*, check registers, credit card statements, bills, invoices, printouts produced by Quicken™, Microsoft Money™ or other computer program capable of generating a printout reflecting sources and uses of funds) if not already provided.

REQUEST NO. 21: All documents identified in response to, or on which you rely, in answering the Interrogatories herein by Respondent to Petitioner.

ORIGINAL SIGNED BY

BENJAMIN D. AYCOCK

James R. Gotwals, OBA #3499

Benjamin Aycock, OBA #21472

JAMES R. GOTWALS ASSOCIATES, INC.

525 South Main, Suite 1130

Tulsa, Oklahoma 74103

Telephone: 918-599-7088

Facsimile: 918-599-7153

ATTORNEYS FOR [REDACTED]

CERTIFICATE OF HAND DELIVERY

I hereby certify that on the 24th day of May, 2016, a true and correct copy of the above and foregoing was had delivered to:

Pamela Raines, Esq.
Tulsa County Courthouse, room 379
ATTORNEY FOR RESPONDENT,



ORIGINAL SIGNED BY
BENJAMIN D. AYCOCK

Benjamin Aycock

EXHIBIT A

Description of Expenses	Monthly Average of Your Expenses	Mo. Avg. of Child- Related Expenses
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 Payment		
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		

Description of Expenses	Monthly Average of Your Expenses	Mo. Avg. of Child- Related Expenses
19. Personal Cleaning Supplies		
20. Laundry or Dry Cleaning		
21. Cosmetics		
22. Haircuts or Styling		
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. Doctors' 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. Daycare		

Description of Expenses	Monthly Average of Your Expenses	Mo. Avg. of Child-Related Expenses
39. School Lunches		
40. School Supplies (<i>e.g.</i> books, uniforms and other supplies)		
41. Other Lessons (<i>e.g.</i> dance, music, art, etc.)		
42. Transportation (<i>e.g.</i> airfare, bus fare, etc.)		
43. Life Insurance Premiums		
44. Entertainment		
45. Total of Minimum Monthly Payments on All Presently Outstanding Credit Card Balances		
46. Child-Related Extracurricular Activities (<i>e.g.</i> uniforms, equipment, fees, traveling expenses, etc.)		
47. Food and Groceries:		
48. Other:		
49. Other:		
50. Other:		
SUBTOTAL		
TOTAL		

AUTHORIZATION FOR ACCESS BY PATIENT OR DISCLOSURE OF
PROTECTED HEALTH INFORMATION

Patient Name: Mary Ann Grogg Medical Record #: _____

Date of Birth: _____ Social Security #: _____

I hereby authorize the use or disclosure of the Protected Health Information ("PHI") described below to be provided to or obtained by the following:

Type or write in name and address of individual or entity to release Patient Health Information below:

Name of Individual/Facility/Company to receive PHI:

James R. Gotwals and Associates, Inc.
525 S. Main, Suite 1130
Tulsa, OK 74103

Information authorized for use and disclosure, or to be obtained:

All medical and health-related information concerning this patient.

The information will be obtained, used or disclosed for the following purpose(s) only:

Insurance Continued treatment Legal At the request of the patient or patient's representative
I understand:

I may revoke this authorization at any time, in writing, except revocation will not apply to information already used or disclosed in response to this authorization. I may revoke this document by presenting my written revocation to the Privacy Officer of JAMES R. GOTWALS AND ASSOCIATES, INC.

I release the entities listed above, their agents and employees from any liability in connection with the use or disclosure of the protected health information covered by this authorization. The entity authorized to disclose the information will not be compensated by the recipient for the disclosure, except for the cost of copying and mailing as authorized by law. Information used or disclosed pursuant to this authorization may be subject to re-disclosure by the recipient and no longer protected by federal law. However, the recipient may be prohibited from disclosing substance abuse information under the Federal Substance Abuse Confidentiality Requirements.

I have the right to inspect the health information to be released and I may refuse to sign this authorization.

Unless the purpose of this authorization is to determine payment of a claim for benefits, the requesting entity will not condition the provision of treatment or payment for my care on my signing this authorization.

I understand that the information authorized for release may include records which may indicate the presence of a communicable or non-communicable disease. I further understand that my medical information may indicate that I have or have been treated for psychological or psychiatric conditions or substance abuse.

Signature of Patient or Representative

Date

Signature of Witness

Date

NOTICE OF RIGHTS: Information in your medical record that you have or may have a communicable or venereal disease is made confidential by law and cannot be disclosed without your permission except in limited circumstances including disclosure to persons who have had risk exposures, disclosure pursuant to an order of the court or the Department of Health, disclosure among health care providers or disclosure for statistical or epidemiological purposes. When such information is disclosed, it cannot contain information from which you could be identified unless disclosure of that identifying information is authorized by you, by an order of the court of the Department of Health or by law.

This authorization shall be effective for sixty (60) days from the date it is executed by the Patient or Representative.