

CASE BACKGROUND

**PLEASE NOTE THAT THIS IS COMPLETELY CONFIDENTIAL AND WILL NOT BE SHARED WITH THE OTHER PARTY OR THEIR ATTORNEY WITHOUT YOUR PERMISSION!**

**PRIMARY CARE CHRONOLOGY**

Where do the children live each night of the week?

Be specific – days and times that they are exchanged:

TIME	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY

Describe an average day for them:

Who gets the child(ren) up in the morning?

Who brushes their teeth or supervises their hygiene?

Who prepares meals?

Who arranges for medical and dental care and takes the child(ren) to doctor's appointments?

Who takes the child(ren) to school?

Who picks the child(ren) up from school?

Who shops for the child(ren)'s clothes?

Who transports the child(ren) to extracurricular activities?

Who participates with the child(ren) in recreational or educational activities?

Describe the nature of the activities and how often you or your spouse or ex participate in them:

Do the child(ren) receive religious training? If so, from whom?

Who arranges the child(ren)'s birthday parties?  
Who helps the child(ren) with their homework?

Who attends parent-teacher conferences?

Are the child(ren) more likely to turn to you or to your spouse (or ex-spouse) when they have problems

Do you feel the child(ren) are closer to you or your spouse (or ex)?

Are the children) in day or child care?

- i. If so, how many hours per week?
- ii. Please give name, address and telephone number of the day-care or sitter:
- iii. Who arranges for the day-care or sitter?

Who cares for the child(ren) when they are ill?

Who disciplines the child(ren)?

By what method?

Has the division of responsibility for childcare changed over the years?

If so, describe:

**TIME AVAILABLE TO SPEND WITH THE CHILD(REN) AND PLANS FOR THEIR FUTURE CARE:**

a. What are your working hours?

b. What time do you leave home?

c. When do you return? d. Do you have flexible working hours?

e. Does your work require travel?

i. If so, what distance and amounts of time?

f. Is your work schedule likely to change in the future?

g. What are your plans for childcare?

h. Describe your housing arrangements, including number of bedrooms:

i. What are your spouse's (or ex's) working hours?

j. What time does your spouse (or ex) leave home?

k. When does your spouse (or ex) return?

l. Does your spouse (or ex-) have flexible working hours?

- m. Does your spouse (or ex) work require travel?
  - i. If so, what distance and amounts of time?
- n. Is your spouse (or ex's) schedule likely to change in the future?
- o. What are your spouse (or ex's) plans for child care?
- p. Describe your spouse (or ex's) housing arrangements, including number of bedrooms:

**SPECIAL NEEDS OF THE CHILD(REN)**

- a. Do the child(ren) have any special or unusual educational or health care needs?
  - i. If so, describe them:
- b. Who has worked to meet those needs?
- c. Are you or your spouse (or ex-spouse) better able to meet those needs?
  - i. Why?
- d. Has the child(ren)'s academic performance changed in the last few years or months?
  - i. If so, what is the reason for the change?
- e. Has a psychiatrist or psychologist examined any of the child(ren)?

**INTERFERENCE WITH OTHER PARENT'S RELATIONSHIP WITH CHILD(REN)**

- a. Have you or your spouse (or ex-spouse) interfered with the child(ren)'s relationship with the other parent or spoken badly about the other parent to the child(ren)?
  - i. If so, explain:

b. Have you or your spouse (or ex-spouse) blocked the other parent=s visitation with the child(ren)?

i. If so, explain, giving dates and frequency with which visitation was blocked:

c. Have you or your spouse (or ex-spouse) discouraged the child(ren) from having a good relationship with a step-parent or a “significant person” in the other parent’s life?

i. If so, explain:

#### **COOPERATION BETWEEN YOU AND YOUR SPOUSE (OR EX)**

a. How well have you and your spouse (or ex-spouse) been able to cooperate on matters concerning the child(ren) and on matters concerning visitation or access to the child(ren)?

b. To what extent do you and your spouse (or ex-spouse) share values regarding how the child(ren) should be raised, what type of education they should have, and what type of religious training they should have (if any)?

#### **FREQUENCY OF MOVES AND PLANS TO MOVE**

a. Have you or your spouse (or ex-spouse) moved in the last ten years?

i. If so, when and where (include moves in the same city):

b. Do you or your spouse (or ex-spouse) plan to move in the near future?

i. If so, when and where?

- c. Does the parent who is not moving oppose the move?
  - i. Why?

### **SENSITIVE TOPICS**

Do you or your spouse (or ex) suffer from any physical disability that would interfere with being able to care for the child(ren)? If so, explain:

Is there any other fact or issue that you are worried your ex could use against you? If so, explain:

### **CHILD(REN)'S PREFERENCES**

- a. Have the child(ren) told you with whom they want to live?
- b. If so, what is the basis for the preference?
- c. How strong is the preference?
- d. How long has the preference been held?
- e. Has the preference changed?
- f. How would you feel about the child(ren) talking to the judge regarding their preference?

### **CHILD(REN)'S RELATIONSHIP WITH OTHER FAMILY MEMBERS**

- a. How do the child(ren) get along with each other?
- b. How do the child(ren) get along with stepparents?

- c. How do the child(ren) get along with stepbrothers and stepsisters?
  
- d. Do the child(ren) have a particularly close relationship with either or both sets of grandparents?
  - i. If so, explain?
  
- e. Do the child(ren) have a strong relationship with anyone else that you believe is important?
  - i. If so, explain:

## **GOALS**

- a. What are your future goals with the child(ren) and reasons for these goals?
  
- b. To what extent do you believe that you and your spouse (or ex-spouse) should have joint custody (sometimes referred to as "shared parental responsibility") under which you both would share equally in making major decisions affecting the child(ren)?
  
- c. What are your spouse's (or ex-spouse's) future goals with the child(ren) and reasons for these goals?
  
- d. Have you and your spouse (or ex-spouse) attempted to work out a settlement of the case between yourselves? What proposals have you made? What are your positions?