

Domestic Relations Case Filing Information Form

Superior Court: County Fulton

Date Filed MM-DD-YYYY

Docket # 2009CV1706 00

Petitioner (s)

Respondent (s)

Raymond Usher IV
Last First Middle I. Suffix Prefix Maiden

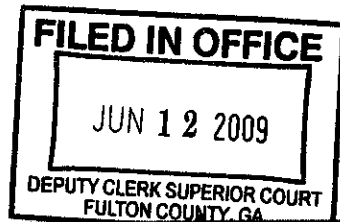
Raymond Tameka Foster
Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Plaintiff/Petitioners's Attorney ProSe

brown ivory t. Bar # 087930
Last First Middle I. Suffix



Case Type (one or more)

- Divorce (includes annulment)
- Separate Maintenance
- Adoption
- Paternity (includes legitimation)
- Domestication of Foreign Custody Decree
- Family Violence Act Petition

Modification

- Modification-Custody and/or Visitation
- Modification-Child Support and Alimony
- Modification-Child Support
- Modification-Alimony

Contempt

- Contempt-Custody and/or Visitation
- Contempt-Child Support and Alimony
- Contempt-Child Support
- Contempt-Alimony
- Other Domestic Contempt
- Other Domestic Relations - Specify

Is Case Uncontested or Contested?

UNCONTESTED

- A. 1. Acknowledgment of Service/Waiver of Venue signed and notarized by respondent Yes No
2. Consent to try signed and notarized by both parties? Yes No
3. Separation Agreement/Settlement Agreement (if children or property are involved) signed and notarized by both parties? Yes No

OR

- B. Divorce by publication with affidavit of diligent search? Yes No

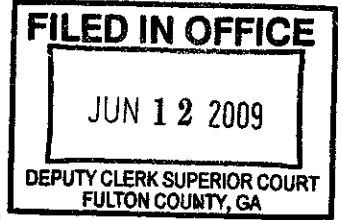
CONTESTED

**Family Violence
 Additional Information – Ex Parte Relief**

Did the initial pleading include a request for relief?

- 1. From alleged family violence? Yes No
- 2. Was ex parte relief requested? Yes No
- 3. Was ex parte relief granted? Yes No

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA



Usher Raymond IV,
Petitioner,

versus

Tameka Foster Raymond,
Respondent.

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Civil Action File
Number 2009 CV 170600

**PETITION FOR DIVORCE SERVED WITH FIRST INTERROGATORIES, FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS AND NOTICE TO PRODUCE**

COMES NOW, *Usher Raymond IV*, Petitioner herein, by and through his undersigned attorney of record, *ivory t. brown*, and files this his *Petition for Divorce* as follows:

1.

Petitioner is a resident of Fulton County, Georgia and has been a resident of the State of Georgia for a continuous period of *six (6)* months immediately preceding the date of filing this Petition.

2.

Respondent, *Tameka Foster Raymond*, is a resident of Fulton County, Georgia, where service may be perfected. Respondent is subject to the jurisdiction of this Court.

3.

The Petitioner and Respondent were married on or about *03 August 2007*.

4.

Petitioner and Respondent separated on or about *July 2008* and since that date have continuously lived in a bona fide state of separation.

5.

The parties have *two (2)* minor children born as issue of the marriage.

6.

Petitioner submits the following:

- (a) Petitioner has not participated as a party or witness or in any other capacity in any other litigation concerning the custody of the children in this or any other state;

- (b) Petitioner does not have information regarding any custody proceeding concerning the children pending in a court in this or any other state; and
- (c) Petitioner does not know of any person who is not a party to the proceeding who has physical custody of the children or who claims to have custody or visitation rights with respect to the children.

7.

The parties should be awarded temporary and permanent joint legal and joint physical custody of the minor children.

8.

Petitioner submits that the minor children are substantially dependant upon each party for support.

9.

Petitioner requests that child support be awarded commensurate with each party's income, statutory guidelines and the needs of the children.

10.

The Petitioner is entitled to a divorce from Respondent upon the following ground: that the marriage between the parties is *irretrievably broken*, as contemplated by O.C.G.A. Section 19-5-3(13).

There is no reasonable hope of reconciliation.

11.

The parties have entered into an agreement resolving all other issues which might arise between them pursuant to their marriage. Said agreement should be incorporated into and made a part of the Final Judgment and Decree.

NOW WHEREFORE Petitioner prays for the following:

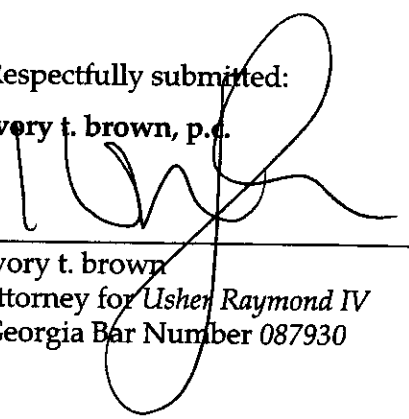
- (a) That summons, automatic domestic standing order and rule nisi issue requiring that the Respondent show cause why temporary relief demanded by the Petitioner should not be granted;
- (b) That the parties be granted a total divorce, that is to say, *a divorce vinculo matrimonii*;
- (c) That the Petitioner be awarded temporary and permanent joint legal and joint physical custody of the parties' minor children;

- (d) That child support be awarded commensurate with statutory guidelines, the child's expenses and each party's income and earnings;
- (e) That the Agreement entered into between the parties be incorporated and made a part of the Final Judgment and Decree;
- (f) For such other relief as this Court deems just and proper.

This the 12th day of June 2009.

Respectfully submitted:

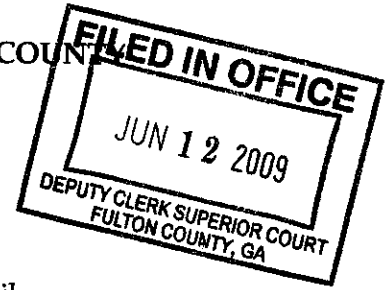
ivory t. brown, p.c.



ivory t. brown
attorney for *Usher Raymond IV*
Georgia Bar Number 087930

Tower Place Center
Suite 1800
3340 Peachtree Road Northeast
Atlanta, Georgia 30326

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA



Usher Raymond IV,
Petitioner,

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versus

Civil Action File
Number _____

Tameka Foster Raymond,
Respondent.

REQUEST FOR PRODUCTION OF DOCUMENTS AND NOTICE TO PRODUCE

To: *Tameka Foster Raymond*

A.

REQUEST FOR PRODUCTION OF DOCUMENTS

I herewith serve upon you the following Request for Production of Documents under the provisions of O.C.G.A. 9-11-34(C).

You are requested to produce the documents and photographs hereinafter set forth at 10:00 a.m. on the *forty-fifth (45th)* day after service of this Request to ivory t. brown, p.c., tower place centre, 3340 peachtree road, n.e., suite 1800, Atlanta, Georgia 30326, where facilities are available for proper copying.

In lieu of producing documents (excluding other tangible items such as photographs, wire equipment, etc., as described in the Request), you may, at your convenience, xerox documents and mail them to the undersigned with a statement of Respondent's Counsel that "the documents so furnished constitute all of the documents requested," with any exception clearly noted and identified, further stating that same are true, correct and complete and that said copies may be substituted and used as originals subject to all pertinent objections.

B.

NOTICE TO PRODUCE

You are hereby requested, pursuant to the applicable Rules of Civil Procedure and O.C.G.A. 24-10-26, to produce upon the trial of the above-styled case and upon any deposition taken by either party and/or of any witness, and at the time and place of said trial, deposition or any hearing held herein, and from day to day and time to time thereafter, the following documents and tangible items.

DEFINITIONS

1.

The term "documents" is used in its customarily broad sense and includes, but is not limited to, any agreements, communications, correspondence, notes, memoranda, summaries, minutes and records of conversations, whether written, typed, printed, photocopied, mechanically or electronically produced or electronically recorded. "Document" means: 1) every writing or record of every type and description that is or has been in your possession, control or custody OR of which you have knowledge, including but not limited to, correspondence, interoffice memoranda, tapes, stenographic or handwritten notes, studies, publications, books, pamphlets, pictures (drawings and photographs), films, microfilms, voice recordings, maps, reports, surveys, minutes, statistical computations, invoices, production orders, sales records, and any other writing evidencing or reflecting facts relevant to the Petitioner's claims; 2) every copy of the above-described writing or record where the original is not in your possession, custody or control; 3) every copy of each such writing or record where such copy is not an identical copy of the original by virtue of any commentary or notation that does not appear on the original.

2.

As used herein, the term "Communication" refers to any information given; any interchange of thoughts or opinions between one or more persons, any sharing of knowledge by one with another; any conference, consultation or bargaining preparatory to making any contract; or any act of or system of transmitting information through any means whatsoever, whether oral or written.

3.

As used herein, terms in the singular include the plural and terms in the plural include the singular.

DOCUMENTS

1.

All copies of income tax returns filed by you, individually and/or jointly with others, with Federal and State Governments from the date of your marriage to date of trial of this case.

2.

All copies of declarations of estimated income tax files by you, individually and/or jointly with others, with Federal and State Governments from the date of your marriage to date of trial of this case.

3.

All paycheck stubs or other documents related to your income or capacity to earn. All documents showing your income from the date of your marriage to the date of trial of the above-styled case.

4.

All records of bank checking and savings accounts maintained by you, individually and/or jointly with others, including but not limited to monthly bank statements, canceled checks, deposit slips and deposit books from the date of your marriage to the date of trial of the above-styled case.

5.

All evidence of property and/or interest in property of every kind and character owned by you, individually and/or jointly with others, including reversionary interest, notes, corporate agreements, pension plan statements and savings account passbooks.

6.

All warranty deeds, quit-claim deeds, deeds to secure debt which name you as grantee or grantor, individually and/or jointly with any other, relating to property in which you have had any interest or equity from the date of your marriage to the date of trial of the above-styled case.

7.

All automobile tag registration certificates and automobile title certificates naming you, individually or jointly with any other person or owner, as owner.

8.

All stock certificates, bond certificates, mutual funds certificates and any other evidence of ownership of any interest in any corporation fund or trust fund naming you, individually and/or jointly with any other as the owner.

9.

All copies of intangible tax returns filed by you, individually and/or jointly with others, with any State or Municipal Government from the date of your marriage to date of trial of this case.

10.

All contents of all safe deposit boxes maintained by you, individually and/or jointly with others, as of the date of service of this Notice to Produce.

11.

All documents relating to your benefits of employment including but not limited to the following: automobile usage, automobile allowance, life insurance, disability, medical/dental insurance benefits, deferred compensation, employer/employee contributions to retirement, stock, club memberships, royalties, earnings and reimbursed expenses.

12.

All copies of personal financial and/or net worth statements submitted by you to any bank or lending institution from the date of your marriage to the date of trial of the above-styled case.

13.

All documents and/or letters received by you from the date of your marriage to the date of trial of the above-styled case from any real estate agent, attorney, accountant, bank officer, stock broker, or any other person notifying you of the value of your interest in any corporation, trust, reversionary interest or in any real or personal property.

14.

All life insurance policies and certificates on your life.

15.

Any and all copies of doctor and dentist, psychologists, orthodontic or hospital bills incurred by you or paid by you within the past two years and to the date of trial of the above-styled case.

16.

All invoices, statements, bills, receipts, account cards or true and correct copies thereof concerning any reimbursable expenses or expense account(s) connected with your employment.

17.

Any trust agreements and similar documents whereby property, real or personal, is held in the name of another but for your benefit, regardless of when and where said agreement(s) were entered and regardless of where said property is located.

18.

Any resumes, employment application forms, letters, notices or other papers relating to any effort on your part to investigate employment opportunities for yourself in the last three (3) years.

19.

Any and all detective reports, investigative reports and related letters, invoices, records,

photographs, film, tape recordings, voice recordings, and other tangible evidence and information of any nature relating to or arising from any surveillance or investigation of the activities or any alleged affairs of your spouse, which surveillance or investigation was performed on your behalf in connection with this action.

20.

Any and all tangible evidence of any nature which is in the possession or control of you, your attorney, or which is being held for you by any person or entity for safekeeping, which evidence relates in any manner to the conduct of your spouse, including, but not limited to, notes, cards, letters, photographs, film, documents, tapes, voice recordings, gifts, jewelry, clothes or other tangible evidence.

21.

Any contracts, agreements or other documents connected with your employment, including but not limited to, employee handbooks, benefit(s), retirement, pension funds, and stock options.

22.

Any and all evidence of any profit sharing plan, pension plan, IRA account, or other retirement or investment program which you or your employer, individually or jointly, contribute to on your behalf, including evidence of the total contributions made, the anticipated benefits to be realized and the current plan administrator, from the date of your marriage to the date of hearing or trial.

23.

All copies of Federal and/or State partnership returns, including, but not limited to, Schedule K-1, (IRS Form 1065), of any partnership in which you are a partner or were a partner from the date of your marriage until the date of trial or hearing in this case.

24.

Any and all diaries or personal notes kept by yourself during the course of the marriage until the date of trial or hearing in this case.

25.

Any and all money market or liquid capital investment account statements listing you individually and/or jointly with any other or others from the date of your marriage until the date of trial or hearing in this case.

26.

Copies of the rental application and lease agreement for the apartment in which you are presently residing or in which you have resided subsequent to your separation until the date of trial or hearing in this case.

27.

All records and other personal evidence relating to any profit-sharing plans, pension plans, Keogh plans, IRA's 401-K plans and any other deferred compensation or retirement plans of any nature in which you have any interest, whether or not any such plans qualify, pursuant to the Internal Revenue Code's current regulations, as amended, from the date of your marriage to date of trial or hearing in this case, including but not limited to the following:

- (a) any quarterly, semi-annual, and annual statement of your interest and account as a participant in any such plan;
- (b) any forms in the Form 5500 series (Annual Return/Report of Employee Benefit Plan) filed by the trustee or administrator of such plan with the Internal Revenue Service for the years from the date of the marriage until the date of trial or hearing in this case;
- (c) the Summary Plan description or similar document containing terms and conditions under which the plan is maintained;
- (d) any statements showing the assets held in or purchased or sold by each of the plans in which you have an interest or account and the value of these assets as of the most recent evaluation date; and
- (e) any documents reflecting the present beneficiaries of your interest in any all of such plans.

28.

Any monthly statements and charge vouchers for credit cards used by you within the past two (2) years until the date of trial of this case.

29.

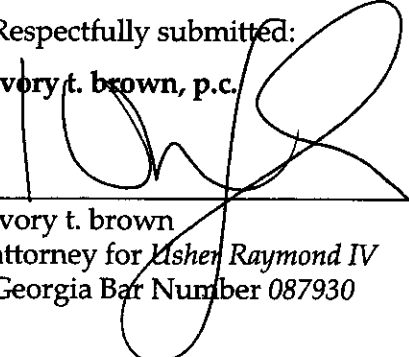
All checks, receipts, records and other documents maintained by you individually or with others since the date of your marriage relating to the following: mortgage payments, rent payments, medical expenses, dental expenses, optician expenses, psychiatric/psychological expenses, food expenses, transportation costs, car payment, drug expenses, utility expenses, including water, electricity, gas and telephone credit cards, insurance, including life, auto, child care expenses, school expenses and health taxes, recreation, salaries, investments and interest

income.

This the 12th day of June 2009.

Respectfully submitted:

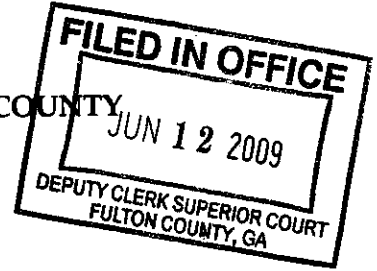
ivory t. brown, p.c.



ivory t. brown
attorney for *Usher Raymond IV*
Georgia Bar Number 087930

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3340 Peachtree Road Northeast
Atlanta, Georgia 30326
404.816.0244 telephone
404.816.0744 telecopier

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Usher Raymond IV,

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Civil Action File
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PETITIONER'S FIRST INTERROGATORIES TO RESPONDENT

To: *Tameka Foster Raymond*

I herewith serve upon you the following written Interrogatories pursuant to O.C.G.A. 9-11-33. You are required to answer these Interrogatories separately and fully in writing under oath and to serve a copy of your answers on me within *forty-five (45)* days after service hereof. These Interrogatories are deemed to be continuing in nature in accordance with the Civil Practice Act.

NOTE A: When used in these interrogatories and requests for documents, the term "Petitioner", "Respondent", "you" or any synonym thereof is intended to and shall embrace and include, in addition to said person, all agents, servants, representatives, private investigators, accountants and others who are in a position to obtain or who may have obtained information for or on behalf of the Petitioner/Respondent.

NOTE B: These interrogatories shall be deemed continuing so as to require supplemental answers if you or your attorney obtain further information between the time the answers are served and the time of trial. Any supplemental answers required by law are to be filed and served upon the undersigned opposing counsel within thirty (30) days from your receipt of such additional information, but not later than the time of trial.

NOTE C: Whenever in these interrogatories you are requested to identify a person, please state, in full, his/her name, home address, business address, home telephone number and business telephone number for each such person.

1.

State your name, home telephone and work telephone number. State the name and address of your employer.

2.

List all assets in which you currently own any interest, giving the date you acquired such