

24TH ANNUAL NUTS & BOLTS OF FAMILY LAW

Intro to Divorce, Divorce Pleadings and Pitfalls, Temporary Support & Fees

By Richard J. Pereira, Esquire and Kira E. Willig, Esquire

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1.0

**INTRO
TO DIVORCE**

1.1

"The recent doom and gloom reporting of the legal profession has only given prospective law students a slice of the story. Ann Levine's book provides you with the rest: practical tips for making your law school decision, what to expect from school, and what a legal career will actually look like. This book is a valuable resource for applicants, law students, and law associates." —*The Law Street Journal*

THE LAW SCHOOL DECISION GAME

A PLAYBOOK FOR
PROSPECTIVE LAWYERS

ANN LEVINE ESQ.

prosecutors with an aura of being a 'good' lawyer in a field that is often criticized."

Intellectual Property

Work in patents may require a bachelor or graduate level degree in a scientific field, but work in copyright and trademark may not. If you want to go into patent litigation, a science or technical background is not required but in patent prosecution, it would be required. Also, in different areas of the country, the patent work varies. For example, in Dallas and Austin, Texas, the client base consists of cellular service providers and software companies, but in North Carolina, the pharmaceutical companies are prevalent and a background in biology (and, specifically, a PhD) might be more helpful than one in electrical engineering, according to Amanda Ellis, a legal recruiter in the Dallas area.

Civil Rights

Fan Gold, a federal prosecutor for the Department of Justice, Civil Rights Division, Criminal Section, says,

I deal with police misconduct, human trafficking, and hate crimes. I work with the FBI and U.S. Attorneys to investigate and prosecute these crimes. There is no typical day. There is a lot of travel and the work changes on a weekly basis. If I am at my desk, I am doing a lot of research and preparing for my next case. Because of the travel, there is a big impact on social life, which impacts men and women differently. [The kind of person best suited to this work] is fair-minded, [and] should do it because they want to do it and because

they love it, not for the money. They have to be able to balance fairness and advocacy and need to be flexible in their daily lives and have to be friendly because you interact with a lot of people.

Insurance Litigation

This may involve depositing people who claim to be injured on the job (and being in court several times a week). Or, you might represent one of several homeowners who allegedly failed to maintain their property, resulting in a mudslide that injured another property. Lawsuits like this rarely go to trial because they are settled, but would involve taking a lot of depositions. Or, you might decide coverage issues—whether a liability policy applies to a certain claim. If you work in-house for an insurance company, you would be managing the work of outside attorneys and not dealing directly with the pleadings and litigation.

Bankruptcy

You might specialize in your representation of either secured lenders, trade creditors, commercial landlords, creditors' committees, trustees/examiners, corporate debtors (which can be very lucrative) or personal (usually a high-volume flat-fee practice). Or, you might do strictly bankruptcy appeals—largely a written motion practice.

Marital and Family Law

Family law involves representing people at their most vulnerable: through divorce, adoption, custody and its aftermath. According to Kara Willig, you need people skills.

It is critical for you to be able to relate to your clients, lawyers, judges, potential fact and expert witnesses, and court personnel. People skills are of the utmost importance because it is essential to develop relationships with the professionals who will refer cases to you and work well with the people in your office.

Patience is required. What is important to your client could be considered trivial minutiae for corporate lawyers (such as what house a child stays at in the threat of a hurricane), but these are real-life issues important to your clients. Also, many people who hire lawyers are business-oriented and can cut to the chase. People getting divorced have emotionally repressed and need to feel heard—out to the chase is not in their vocabulary, and you need to listen to them.

Especially in family law, you need to be savvy. In many situations, the other side (and sometimes your client) is just plain lying, and you need to detect it and know when something doesn't sound or look right.

You need attention to detail, endurance, and the ability to focus. You have to be able to multitask and quickly jump from one case or task to the next or be able to focus on one task for an incredibly long period of time. In one day, you could be in several meetings, take some calls, return some e-mails, draft some letters or motions, handle some preparation for an upcoming hearing or deposition, prepare some discovery, and head off to handle a deposition or meeting. Or you could spend 14 hours at one mediation. It all depends on the day.

I am a certified family mediator and a Guardian ad

lium for children. I am an adjunct professor of family law. As an attorney, I represent clients who are getting a divorce, need to change or enforce their divorce agreements, need a prenuptial agreement because they are getting married, or need a parenting and child support agreement because they are leaving a relationship that produced a child.

As a mediator, I will meet with the parties and sometimes their lawyers and assist them in coming up with solutions to resolve their case to everyone's satisfaction. As a Guardian ad litem, I represent a child's "best interest" when their parents who are breaking up cannot agree on what is best for their child, such as a time-sharing schedule. As an adjunct professor, I teach family law to upper-level law students.

[My job] is intellectually stimulating and can be emotionally and spiritually satisfying to know you changed the course of someone's life for the better. I am incredibly interested in how other people lead their lives, so I enjoy reading people's bank statements, credit card statements, or psychological evaluations. I like being asked for advice and solving problems. I like that for a large part of what I do I can attend to my clients and their cases virtually. With just a laptop and cell phone, I can work from almost anywhere. Being a family law attorney can be incredibly lucrative once you can generate your own cases and not rely on someone else to feed you work.

It is also emotionally draining. People's lives are in limbo while you are handling their case. For some reason, a few family law attorneys become for can

become) too emotionally invested in their client's goals and, as a result, are rude and lack the professionalism seen in other areas of the law. The system is overburdened with cases and justice can take time.

Learn to distinguish and give sound legal advice through this chapter on ethics and legal theory. Applying law about pressure that isn't the best because of ethics. Pressure if you are asked by one or more of your clients in this chapter then you should not let technology do it. Check for you—you may want to be a lawyer.

On a personal level, say goodbye to work-free nights, weekends, holidays, and vacations. As children are not in school during these times, conflict is bound to arise and you will be disturbed. I have been cracked down while on vacation in Africa and Japan by clients with emergencies. Family law clients have few boundaries—the same technology we use to gain some freedom and flexibility can work against us too—you will be called or get texted at all hours of the night, because they rely on you to solve their problems. It is very difficult to achieve that so-called “balance” between work and a private life when you are a litigator and a family law litigator in particular.

Family law is all about networking. Every job I have ever gotten in family law has been because I knew someone who knew someone who was looking to hire, and I could back up the referral with a strong resume

and good interview. I attended law school where I intended to practice law, so I could clerk during the semester and meet people in my legal community. I was asked to become an adjunct by a dean who seven years earlier had been my professor. Participating in law school activities helped also—I organized panels for clubs I belonged to that allowed me to reach out to members of the legal community.

—Kira Willis, Miami, Florida

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Client Intake Sheet Family Law Practice Group

Today's date	
Referred by:	
Name:	
Home Address:	
City, State, Zip:	
Home Telephone Number:	
Cellphone Telephone Number:	
Other Telephone Number:	
Email address(es)	
Social Security Number:	
Date of birth:	
Age:	

Number of computers: _____ including home _____ or office _____

Mailing address (if different from above)	
City, State, Zip	
Rent or own home?	
Number of months/years in County:	

Employer:	
Work Address:	
City, State Zip:	
Work telephone number:	
Type of Employment (Position)	
Number of years at present job:	

State your Education, training or special skills	

Name of Spouse:	
Date of birth:	
Age:	
Social Security Number:	
Home Address:	
City, State, Zip:	
Telephone Number:	
Email Address:	
Employer:	
Employment Address:	
City, State, Zip	
State your spouse's Education and business:	
How long at present employment?	

Date of Marriage:	
Place of Marriage:	
Date of Separation:	
Has a petition been filed? If so, have you been served? Please provide date of filing and date of service:	
Military Service (if any):	
Was there an Antenuptial agreement?	
Is Wife to have maiden name restored:	
State Wife's Maiden name:	
Name and telephone number of spouse's attorney if known	

NAME OF CHILDREN BORN OF THIS MARRIAGE	DATE OF BIRTH AND PLACE OF BIRTH	SOCIAL SECURITY NUMBER	SEX	CURRENT ADDRESS (AND NAME OF PERSON CHILD IS CURRENTLY RESIDING WITH)

LIST ALL ADDRESSES WHERE CHILDREN NAMED ABOVE (IN ORDER LISTED) HAVE LIVED WITHIN THE PAST FIVE (5) YEARS AND WHO THEY LIVED WITH DURING THAT TIME

ADDRESS	NAME(S) OF PERSON(S) CHILD(REN) RESIDED WITH	RELATIONSHIP TO CHILD(REN)

HAVE THE CHILDREN NAMED ABOVE EVER BEEN INVOLVED IN A CUSTODY PROCEEDING IN THIS OR ANY OTHER STATE? _____. IF YES, EXPLAIN.

LIST ALL PERSONS WHO HAVE EVER HAD OR CLAIMED PHYSICAL CUSTODY OR VISITATION RIGHTS WITH THE CHILDREN:

NAME	ADDRESS

HAVE EITHER YOU OR YOUR SPOUSE BEEN PREVIOUSLY MARRIED: _____

If so, explain briefly: _____

Name of prior spouse: _____

Date of divorce: _____

NAMES AND AGES OF CHILDREN FROM THE PREVIOUS MARRIAGE AND AMOUNT OF CHILD SUPPORT PAID, OR RECEIVED, IF ANY:

NAME OF CHILD	AGE OF CHILD	AMOUNT RECEIVED/PAID

DO YOU OR YOUR CHILDREN HAVE ANY SPECIAL MENTAL OR PHYSICAL PROBLEMS?

IF YES, PLEASE EXPLAIN BRIEFLY: _____

HAVE YOU EVER BEEN ARRESTED: _____

DATES: _____

WHAT WERE THE CHARGES: _____

WHAT WAS THE OUTCOME OF THE CASES: _____

IS THERE IS ANY PENDING LITIGATION INVOLVING EITHER SPOUSE THAT COULD AFFECT PROPERTY RIGHTS?

HAS EITHER PARTY EVER SOUGHT DIVORCE BEFORE?

IF SO, PLEASE EXPLAIN:

BRIEFLY LIST REAL AND PERSONAL PROPERTY OWNED BY YOU AND/OR YOUR SPOUSE AND INDICATE HOW SUCH PROPERTY IS HELD (jointly or solely owned):

ASSET	DATE OF PURCHASE	PRESENT VALUE
Home:		
2 nd Home:		
Land:		
Boat:		
Automobile (make and model)		
Automobile (make and model)		
Automobile (make and model)		

DOES EITHER PARTY HAVE A PENSION:	
DOES EITHER PARTY HAVE HEALTH INSURANCE?	
DOES EITHER PARTY HAVE LIFE INSURANCE:	
(IF SO, DESCRIBE BRIEFLY)	

ADDITIONAL TIMESHARING MATTERS

PLEASE ADVISE THE CURRENT TIMESHARING ARRANGEMENT, IF ANY:

WEEKDAY:

WEEKEND:

DOES YOUR FAMILY PRACTICE A SPECIFIC RELIGION?

ARE THERE ANY SPECIFIC RELIGIOUS HOLIDAYS OF IMPORTANCE TO YOUR FAMILY? IF SO, LIST THE HOLIDAY AND YOUR PROPOSED TIMESHARING FOR SAID HOLIDAY?

ARE THERE ANY MAJOR EVENTS IN THE CHILDREN'S LIVES WITHIN THE NEXT 12 MONTHS? (BAR/BAT MITZVAHS, FIFTEEN (QUINCEANERO), SWEET SIXTEEN, BAPTISM, COMMUNION, CONFIRMATION). IF SO, PLEASE SPECIFY THE EVENT(S), THE DATE OF SAME, AND YOUR PROPOSED TIMESHARING FOR SAID EVENT, INCLUDING ANY ISSUES WHICH NEED TO BE ADDRESSED FOR THIS PARTICULAR EVENT.

ARE THERE ANY UPCOMING MAJOR FAMILY EVENTS WITHIN THE NEXT 12 MONTHS? (BIRTHDAYS, FAMILY WEDDINGS, GRANDPARENTS BIRTHDAYS, ETC.) PLEASE ADVISE YOUR PROPOSED TIMESHARING FOR SAID HOLIDAY AND ANY ISSUES YOU FORSEE WITH THE EVENT.

URGENT MATTERS

ARE THERE ANY URGENT ISSUES PENDING WHICH NEED TO BE IMMEDIATELY ADDRESSED? PLEASE EXPLAIN.

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DISSOLUTION OF MARRIAGE: FREQUENTLY ASKED QUESTIONS*

When does the divorce begin?

Divorce begins when you or your spouse first genuinely consider ending the marriage. It is common for every married person to contemplate divorce or separation from time to time. When these thoughts linger after the anger or frustration has passed, they are a signal to take action because your marriage possibly is falling apart. When the “I want out” feelings dominate the desire to work things out and you start considering the realistic aspects of separation or divorce (change of residence, living expenses, effect on the children), the divorcing process has begun. Once begun, the process does not need to end in a divorce. It is the willingness to do something positive as soon as you recognize the process beginning that gives you the best chance of reconciliation.

Should I stay married for the sake of children?

You probably should not stay married for the sake of children, if they are the only thing keeping you together. The hostility displayed by you and your spouse is unhealthy for the children and may very well interfere later with their own marriages. In reality, however, people rarely remain together just for the sake of the children. Most of the time there are other factors at play, sometimes unconscious ones. In fact, other gratification from a relationship can keep an estranged couple together, even though their marriage is broken. Arrangements sometimes develop between married couples where they only share the household because it is economically or socially convenient. They create their own separate lives within the home, without interfering with or considerably aggravating the other. Parties living in a state of truce for many years will often divorce after the youngest child is on his or her own. If no such gratification exists for you, then deal with your marital problems sensibly. Don't just ignore the deterioration of your marriage— solve it, adjust to it, or separate.

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I want a divorce. Can't I just leave?

Yes, you can, but talk to a lawyer before you make this crucial decision. In a potentially litigated divorce a number of strategic considerations argue against a spouse's leaving the marital home. For example, if a wife or a husband seeking custody of the children leaves the home without the children, he or she may be at a substantial disadvantage when the actual custody proceedings begin. There are also significant financial considerations involved in any decision to live apart from your spouse which should be discussed with your attorney.

* Reprinted in part from "The Divorce Handbook," by James T. Friedman, Random House, New York (1982) and from The Family Advocate, "Your Divorce" (1992).

Can a separation save a marriage?

Sometimes, yes. Physical proximity can be great source of antagonism for couples considering divorce. A change in the status quo is often times the first step to saving the marriage. The new perspective gained by separation may help you discover the cause of your discontent. The actual experience of separation provides a testing period that can alter perceptions of divorce as a solution. The party who is pushing for a divorce on the mistaken belief that physical separation will resolve his or her unhappiness often finds that the contrary is true. Separation then may provide new insight into the cause of unhappiness or the advisability of resuming the marital relationship.

If I leave the house voluntarily, can I get back in?

The longer you are gone, the more difficult re-entry is likely to be if your spouse opposes it. Even if you have a written agreement that says you are leaving will not prejudice your right to return, courts are sometimes reluctant to enforce these agreements if the separation has been a long one. Very often a spouse who is sincerely interested in saving the marriage will agree to leave in order to give the other spouse an opportunity to reconsider. However, by

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making such an arrangement, the departing spouse takes a very real chance that no re-entry will be possible.

Do voluntary payments set a precedent?

Yes, very often they do in terms of amount. If a supporting spouse has voluntarily been paying a certain amount for an extended period of time, it may be difficult to convince the court at a later time of an inability to pay that amount, unless there is proof of a substantial change in financial circumstances. By the same token, if the supported spouse accepts a certain amount and is able to live comfortably on the amount provided for an extended period of time, it will be equally difficult to convince the court of a need for a greater amount of support.

Can I date during separation?

Casual dating will not legally affect the granting of a divorce, the award of custody and support, or the division of property. However, if your dating involves considerable time spent away from the children or staying out overnight or involves a person of significantly bad repute or involves the expenditure of funds, it may become an issue in the divorce case. It is best to consult your attorney before you get involved in any regular or serious dating.

It looks like divorce. How can I protect myself?

See a lawyer as soon as possible. You don't have to hire one, but you must learn what your rights and obligations are in regard to your spouse and your family. There are many books and pamphlets on divorce and separation but, no book, no pamphlet and no person untrained in the law as it applies in your community can advise you adequately.

*Reprinted from "Family Advocate," American Bar Association, Vol. 18, No. 4
(1996)

REMARKS BY YOUR SPOUSE

Over the past years, we have heard thousands of intimidating remarks made by one spouse to the other. Typical of such remarks are the following:

- I am going to drag this case out forever. By the time you get your share of the property, you'll be too old to enjoy it.
- If you persist in your economic demands, I am going to file a custody action and take the children away from you.
- I've got the best lawyer in town. He's going to kill you and your lawyer.
- My lawyer is mean. He's going to make your life miserable.
- Your lawyer is a crook. His only interest is to drag out the case in order to make more money.
- You've gotten yourself the most expensive lawyer around. The two lawyers are going to eat up all of the assets that we acquired during the marriage.
- My lawyer knows all of the judges. There's no way that you are going to get a decent result in court.
- I was ready to give you a fair settlement. Now that you got a lawyer, I am going to play hard ball and you're going to end up with much less than I was willing to give you.
- You're crazy for pushing this divorce case. All that you are doing is taking money away from the children.

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- If you don't settle on a reasonable basis, I will have to take the children out of school.
- I'm going to tell the children that you are responsible for this mess.
- At the rate you and your lawyer are going, I'll have to declare bankruptcy and nobody is going to win.
- If you don't settle on my terms, I'm going to drag your girlfriend (or boyfriend) into this case.
- Your lawyer is too busy to handle this case.
- You can't trust divorce lawyers. They always work with the lawyer on the other side and run up unnecessary time to make more money.

The above are merely illustrative of what our divorce clients may hear from time to time from their spouses. Hopefully, your spouse isn't the kind who makes such statements. On the other hand, you may be on the receiving end of such remarks or variations on the theme. Our experience has been that there rarely is any basis for such comments. If you do hear any of the above "garbage" from your spouse, please understand that our position is the following:

- Our court system generally works and although it may take time for justice to prevail, we have faith in the system and its ability to deal with most of the problems that may arise.
- We are experienced in family law matters and you can be assured that we are not going to be intimidated by any such statements made by your spouse.

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- If you have any concerns, please discuss them with us.
- Finally, we take pride in our adherence to the strictest of ethical standards. You can always count on our integrity and good faith in representing you.

CHILDREN AND DIVORCE: ADVICE FOR PARENTS*

Divorce does not condemn your children to an unhappy life. Your living arrangements will change but in time you and your children will find happiness in your new lives. You and your former spouse will be connected through your children for the rest of your lives. Help your children accept what has happened and move forward toward a brighter future.

Remember: you are not alone. Each day, thousands of families experience many of the same challenges and frustrations you are dealing with right now. Your lives may be changing, but that does not mean that things need to be bad. Children need two loving and involved parents who will be dedicated to providing life-long love and support. Parents and children must work together to form a new kind of family.

- Tell your children you love them.
- Make sure your children know that it is okay to love the other parent.
- Be willing to talk about your children's feelings or encourage them to talk with a teacher, counselor or family friend.
- Answer your children's questions honestly while avoiding unnecessary details about your relationship with your former spouse.
- When you make a mistake or lose your temper, admit it and tell your children that you can and will do better tomorrow.

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- Don't argue in front of your children.
- Don't pump your children for information about the other parent or use your children to carry messages back and forth.
- Don't speak negatively about your former spouse in front of your children or discourage their communication with the other parent.
- Reassure your children that they are not to blame for the divorce.
- Include your former spouse in your children's school activities and special events.
- Reassure your children that they are loved by both parents and they always will be taken care of.
- Be consistent and on time when picking up your children for visitation. Make every effort not to cancel plans. If your plans must change, always give your children and your former spouse as much notice as possible.
- Don't put your children in the middle of your problems or ask them to take sides.
- Don't make promises you can't keep.
- Don't use your children as confidants. Let your children be children.
- Don't ask your children with whom they want to live. That issue is for you and your spouse to solve, it is too much of a burden for children.

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- Be responsible and prompt with child support payments and don't discuss child support issues with your children.
- Establish a home in which your children feel comfortable and secure.
- Develop a workable and cooperative parenting plan that gives your children access to both of you.
- Give your children permission to have a loving, satisfying relationship with the other parent.
- Make every effort to agree with your former spouse about discipline. This will help your children feel more secure.
- Don't compare a child to your former spouse. Remember, your child is an individual. You may like or dislike certain qualities about your former spouse that you see in your child but, such comparisons can be harmful and painful for children.

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- STRATEGIES FOR
 - DEALING WITH RELATIONSHIPS
 - BALANCING WORK & FAMILY

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JUDGMENT OF YOUR DIVORCE.

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started

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and have children under the
age of 18

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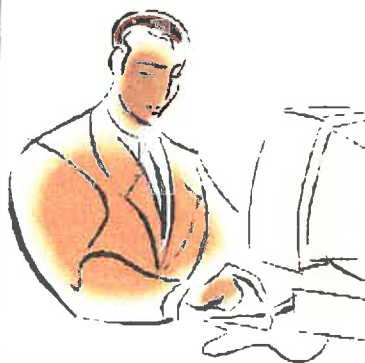
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and
Families



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1.4

Proposed Electronic File Management – E-Folders & SubFolders

- Court Documents (Pleadings)
 - *Note: Subdivide folders into DOM, PJ (post-judgment), DV (domestic violence), etc., if necessary*
 - *Note: Create uniform labelling system. Example: File Date.Party.Title.Date of Event*
- CSGW
- Discovery
 - Husband
 - CCMD
 - Deposition
 - Financial Affidavits
 - Interrogatories
 - Requests for Production
 - Wife
 - CCMD
 - Deposition
 - Financial Affidavits
 - Interrogatories
 - Requests for Production
 - Witnesses
 - SDT Without Depo to Non-Parties
- Drafts
 - *Note: A subfolder for drafts of documents sent to OC or a client for review, labelled with date and to whom it was sent. Example. MSA.proposed.to client 11.8.16*
- Hearing Prep
 - *Note: Subfolders for hearings with Notice of hearing, Motions set, and any research, schedules, exhibits, et al.*
- Legal Research
- Letters
 - *Create uniform labelling system. Example: Sent Date.SendingParty.Addressee. Topic.*
- Mediation
- Notes
 - Client Notes
 - Communications Between Parties
 - Internal Office Memos and Notes
- Transcripts
- Word Documents

70.FH.Fe-N Taking Depo.Susan.Orban.10.4.12 for 11.20.12
 71.FH.2nd Motion to Strike Sham Pleading.10.11.12
 72.Fe-N.Hg.H's.M.Compl.10.11 for 10.31
 73.FW.N.Service.Answers.to.Jefrempi.10.12.12 (notary 4.1)
 75.FW.Feq.Hg.FW's.M.Fees.10.16.12
 76.Order.Stipulation.O.Subj.Court.10.30.12
 78.FW.N.Designation.Email.RFP.11.8.12
 79.FW's.Response.1st.RFP.11.9.12
 80.O.Referral.GM.FH.M.TS.11.20.12
 82.FW.N.Unavailability.Dec.12.Jan.13.RFP.12.28.12
 84.FW.Request.Copies.Surpass.1.7.13
 85.FW.L.RFP to FH.1.13.13
 86.FW.N.Service.Waives.ROGS.to.FH.1.14.13
 87.FW.Request for FH to Update.MD.1.29.13
 88.FW.RFH.M.Temp.Fees.3.12.13
 89.FW.N.Depo.FH.3.12.13 for 4.24.13
 90.FW.N.Change.Firm.Name.&.New.Design.Emails.3.20.13
 91.FW.N.Pred.NonParty.Study.3.23.13
 92.FW.N.Pred.NonParty.Craiglist.3.27.13
 93.FW.SDT.Craiglist.and.Blank.Aff.3.27.13
 94.FH's.2nd.Supp.Petition.Modify.FI.4.2.13
 95.Agreed.O.FH.Discovery.4.3.13
 96.FH.Objection.to.SDT.Saudley.4.8.13
 97.ORG.M.FW.Fees and FH 2nd Supp Pet.4.19.13
 98.FW.SDT.Study.4.23.13
 99.FW.M.C.Compl.Sanctions.Discovery.4.24.13
 100.FH's.Response.RFP.4.24.13
 101.FH.N.S.and.FH.Answers.ROGS.4.24.13
 102.FW.N.Depo.FH.4.24.13 for 5.23.13
 103.FW.N.Unavailability.May.2013.RFP.4.23.13

35.FH.N.Taking Depo.Ronier.2.27.12 for 3.2.12
 36.FW's.N.FH.Aimony.Compliance.2.24.12
 37.FW's.M.Exemption.Time.Supp.2.24.12
 38.Ronier.Objection.SDT.2.27.12
 40.Fe-N.Depo.Ronier.2.29.12 for 3.2.12
 41.FW's.M.Brief.Enlargement.Time.3.5.12
 42.FW's.Amended.N.Compliance.H.Aimony.3.6.12
 43.FW's.Amended.FH.Supp.P.Aimony.3.6.12
 44.FW's.M.Protective.O.3.6.12
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 62.FH.Designation.Email.Seg.8.28.12
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 67.FH's.M.Compl.10.4.12
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- 2016-10.12.W.Notion.Filing.Nathan Berman.Majestic.8.30.Depo Tran
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- 2016-10.12.W.Notion.Filing.Wife Aug 16 Depo Transcript
- 2016-10.12.W.Response to Interrogatory on Non-Party SDT
- 2016-10.13.W.Notion.Of Appearance.Abdul Milne Kadi
- 2016-10.14.TPD.Objection.SDT to Gunster
- 2016-10.17.TPD.MOH.10.27.Various Motions
- 2016-10.17.W.MOH.10.20 Amended M Leave to Amend
- 2016-10.17.W.MOH.10.27.Citbank Obj Status Conference
- 2016-10.19.TPD.Notion.Intent.Decisional Law
- 2016-10.21.W.Henrik MOU Notice Unavailability
- 2016-10.21.W.MOH.10.27 Amended Motion Leave to Amend
- 2016-10.21.W.MOH.10.27.Objection to SDT to Defense Counsel
- 2016-10.25.TPD.Joe Hestice of Unavailability
- 2016-10.25.W.Luis.Amended Notice of Unavailability
- 2016-10.26.W.Memo Law Amending Pleadings
- 2016-10.31.H.Objection to MD, Regs, RFP
- 2016-10.31.W.2nd RFP to H
- 2016-11.7.W.MOH.2.10.17 pending motions
- 2016-11.8.W.MOH.Motion Leave to Amend.11.30

- 2016-3.15.W.Motion.911.Ex Parte Injunction
- 2016-3.15.W.Motion.Temp Alimony
- 2016-3.15.W.N.Notion.Appearance.Luis Padron
- 2016-3.15.W.Petition.Amended DOM
- 2016-4.4.O.Ex Parte Order Granting Temporary Injunction without Notice
- 2016-4.4.O.Order Ex Parte W Emergency Motion Injunction
- 2016-6.14.W.MOH.10.13.Ex Parte Order Granting Injunction
- 2016-8.18.O.Order.Objection to W SDT Collection, Citbank, ATT, Atlantic Broadband
- 2016-9.19.W.Notion.Intent.SDT Citbank
- 2016-9.22.W.Notion.Service.Standard Regs.Husband
- 2016-9.22.W.RFP to Husband
- 2016-9.29.W.MOH.Amended.10.6.Motion Leave to Amend Global Investments
- 2016-9.29.W.Notion.Intent.SDT - Gunster Yeakley
- 2016-9.29.W.Response Memo Law Opposition TPD Objection to SDT
- 2016-9.29.W.MOH.10.6.Motion.Leave to Amend Add TPD Global Investments
- 2016-10.3.TPD.Objection.W SDT to Citbank
- 2016-10.4.H.Motion.Dismiss.Jurisdiction.Forum Non Conveniens
- 2016-10.4.H.NOA.GreenSpoon RUP
- 2016-10.7.W.Response.RFP.Letter Rogatory
- 2016-10.11.TPD.Motion.Compel E Discovery Whatsapp
- 2016-10.11.TPD.Motion.Resolve.Ex Parte Communication Issue
- 2016-10.11.TPD.Notion.Intent.Rely Foreign Law note residence Chile issue
- 2016-10.12.TPD.Motion.Compel Immigration Documents
- 2016-10.12.TPD.MOH.3.Motions. Ex Parte Comm - Compel E-Discovery - Compel Immigration Docs
- 2016-10.12.TPD.Notion.Filing.Wife Aug 16 Depo Transcript
- 2016-10.12.W.Affidavit in Support of Jurisdiction
- 2016-10.12.W.M.Continuaance of 10.13 Hg on Jurisdiction
- 2016-10.12.W.M.Leave.Amend.Petition
- 2016-10.12.W.MOH.10.13.add on M Continuaance of Hearing
- 2016-10.12.W.MOH.10.13.add on M Leave to Amend
- 2016-10.12.W.Notion.Filing.Exhibit to Affidavit



1.5

Binder Numbering System

1.0 - Pleadings

2.0 - Correspondence

2.1 Correspondence In

2.2 Correspondence Out

2.3 Client Correspondence

3.0 - Attorney Notes/Law

4.0 - Our Client's Discovery

5.0 - Other Party's Discovery

6.0 - Deposition Preparation Materials

7.0 - Miscellaneous

8.0 - Hearing Binders

9.0 - Subpoena Responses

DOCUMENT NAMING SYSTEM

D. DISCOVERY

- i. Interrogatories
- p. Production
- f. Financial Affidavit
- x. Other Designation

L. LETTER

- c. Client Letter
- oc. Opposing Counsel (The Last Name)
- j. Judge
- x. Other Designation

N. NOTICE

- h. Hearing
- d. Deposition
- m. Motion
- i. Interrogatories
- p. Production
- t. Trial
- x. Other Designation

M. MOTION

O. ORDER

R. GENERAL MASTER REPORT

S. SUBPOENA (PERSON'S LAST NAME)

1.6

Helpful Websites

Family Law Forms

<http://www.flcourts.org/resources-and-services/family-courts/family-law-self-help-information/family-law-forms.shtml>

Relevant Statutes

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Index&Title_Request=XLIII

Chapter 61

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0000-0099/0061/0061ContentsIndex.html&StatuteYear=2016&Title=%2D%3E2016%2D%3EChapter%2061

Chapter 88

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0000-0099/0088/0088ContentsIndex.html&StatuteYear=2016&Title=%2D%3E2016%2D%3EChapter%2088

Chapter 741

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0700-0799/0741/0741ContentsIndex.html&StatuteYear=2016&Title=%2D%3E2016%2D%3EChapter%20741

Chapter 742

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0700-

[0799/0742/0742ContentsIndex.html&StatuteYear=2016&Title=%2D%3E2016%2D%3EChapter%20742](http://www.flcourts.org/0799/0742/0742ContentsIndex.html&StatuteYear=2016&Title=%2D%3E2016%2D%3EChapter%20742)

§48.193

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0000-0099/0048/Sections/0048.193.html

Rules of Procedure

Civil

[https://www.floridabar.org/TFB/TFBResources.nsf/Attachments/10C69DF6FF15185085256B29004BF823/\\$FILE/Civil.pdf?OpenElement](https://www.floridabar.org/TFB/TFBResources.nsf/Attachments/10C69DF6FF15185085256B29004BF823/$FILE/Civil.pdf?OpenElement)

Family

[https://www.floridabar.org/TFB/TFBResources.nsf/Attachments/416879C4A88CBF0485256B29004BFAF8/\\$FILE/Family.pdf?OpenElement](https://www.floridabar.org/TFB/TFBResources.nsf/Attachments/416879C4A88CBF0485256B29004BFAF8/$FILE/Family.pdf?OpenElement)

Judicial Administration

[https://www.floridabar.org/TFB/TFBResources.nsf/Attachments/F854D695BA7136B085257316005E7DE7/\\$FILE/Judicial.pdf?OpenElement](https://www.floridabar.org/TFB/TFBResources.nsf/Attachments/F854D695BA7136B085257316005E7DE7/$FILE/Judicial.pdf?OpenElement)

Family Law Bar

<http://familylawfla.org/>

Miami-Dade Clerk of Court

<http://www.miami-dadeclerk.com/>

Miami-Dade County Property Appraiser

<http://www.miamidade.gov/pa/>

Florida Department of State

<http://www.sunbiz.org/>

Other

<http://floridachildsupportcalculator.com/calculator>

www.splitopia.com

www.divorcenet.com

www.handinhandparenting.org