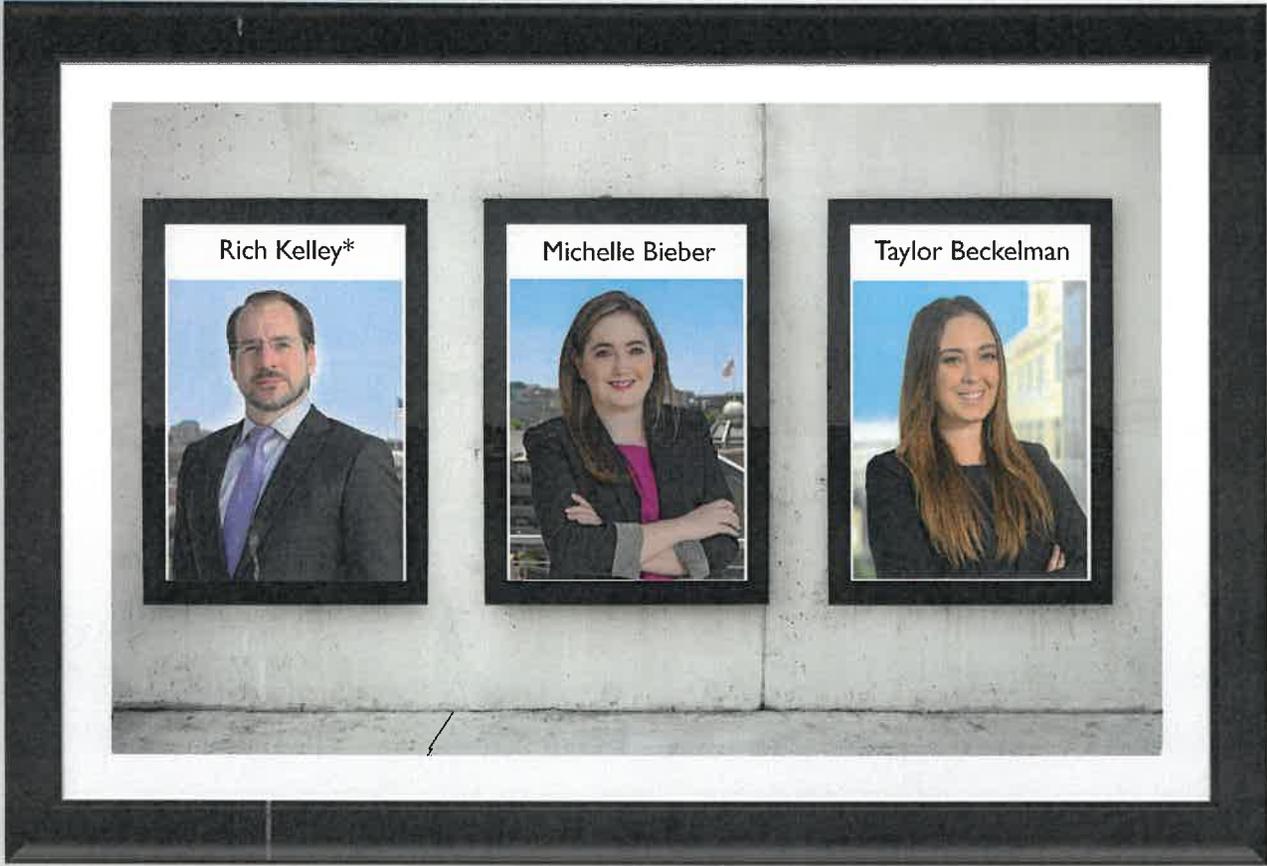




INN OF COURT – DMRE CRASH COURSE

FEBRUARY 16TH, 2026



Rich Kelley*

Michelle Bieber

Taylor Beckelman



*THE ONE WHO MADE US DO THIS

OUR VOLUNTEERS & BACKGROUND

Sam Turley “Jack” – GMU alum. Current law clerk to The Honorable Daniel S. Fiore, II at Arlington Circuit Court. BKK associate beginning Fall 2026.

Livia Paschke “Jenna” – 3L at GMU. 2026-27 law clerk to The Honorable Daniel S. Fiore, II at Arlington Circuit Court. BKK associate beginning Fall 2027.

Jack and Jenna have been married for 15 years. They live in Arlington with their children: Molly (12) and Max (8). Jack is an investment banker making 7 figures a year, and Jenna is a stay-at-home mom.

30,000 FOOT VIEW OF THE PROCESS



I. Consultation



II. Mediation



III. **Litigation Process**



IV. Trial

I. CONSULTATION

Grounds for
Divorce
(Fault vs. Legal
Separation)

Custody/Visitation
(Legal & Physical)

Child Support
(Guidelines
Sole vs. Shared)

Spousal Support

Equitable
Distribution
(Assets & Debts)

Title 20 of Virginia Code: § §20-91 (Divorce), 20-107.1 (Spousal Support), 20-107.3 (ED) 20-108.1 & 20-108.2 (Child Support) , 20-124.3 (Best Interests of the Child)

I. CONSULTATION

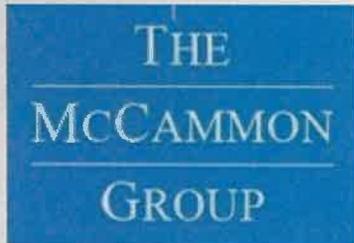
MAKING AN INITIAL OFFER



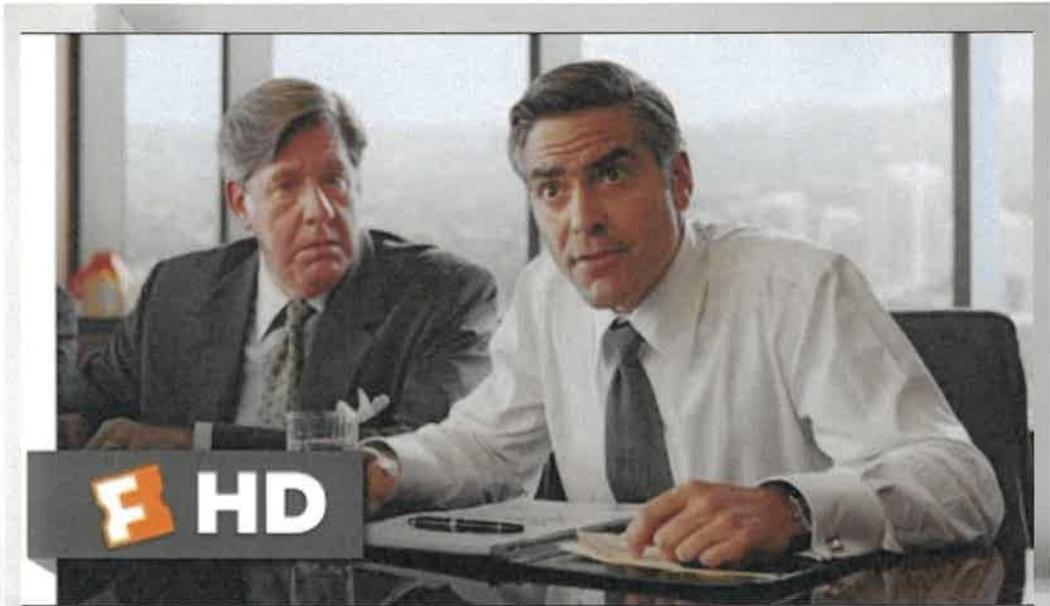
stop at 1:10 mark

II. MEDIATION (WITH NEUTRAL)

"Mediation is a voluntary, consensual process that uses a neutral third party to facilitate the negotiation of a dispute with the goal of reaching a settlement agreement. Mediation provides many substantial benefits. Expediency, confidentiality, flexible solutions and reduced costs are but a few of the advantages of mediation versus adjudication." – The McCammon Group



II. SETTLEMENT ("FOUR-WAY")



III. LITIGATION PROCESS (CONDENSED)

1. Complaint – Counter

2. Discovery (Interrogatories, Requests for Documents, Requests for Admission)

3. Motions ((*Pendente Lite*, Motion to Compel, Motion for Independent Evaluation, Motion to Appoint Guardian *Ad Litem*, Motion to Quash Subpoena, etc.)

4. Depositions

5. Expert Designations

6. Exhibit and Witness Lists

DISCOVERY REQUESTS (SAMPLE INTERROGATORIES)

copies provided

VIRGINIA:

IN THE CIRCUIT COURT OF ARLINGTON COUNTY

JACK MASON,

Plaintiff,

v.

JENNA MASON,

Defendant.

Case No. CL 2026-12345

DEFENDANT'S FIRST INTERROGATORIES TO PLAINTIFF

The following Interrogatories are directed to you pursuant to Rules 4:0 et seq. of the Rules of the Supreme Court of Virginia. You are required to answer these Interrogatories fully, in writing and under oath, and to serve a copy of your answers upon the undersigned counsel within the timeframe prescribed by the Rules. In interpreting the Interrogatories and making your responses, please observe the following definitions and instructions.

DEFINITIONS AND INSTRUCTIONS

- a. These Interrogatories are continuing in nature and may require you to update the information given pursuant to the supplementation rules of Rule 4:1.E.
- b. The word "person," used in these Interrogatories, includes both the singular and plural, and includes individuals and entities, natural persons, representative persons, public or private corporations, companies, unincorporated associations, trusts, partnerships, organizations, government entities, or groups, plus any divisions, departments, agencies, or units thereof.
- c. Where the identity or name of a person is requested, state in your answer the full name of the person, present or last known home address and business address, and the person's daytime telephone number.
- d. "You" and "Your" refer to Plaintiff JACK MASON and any of his accountants, agents, attorneys, consultants, employees, assigns, and representatives of any description.

SCHEDULING ORDER

copies provided

VIRGINIA:

IN THE CIRCUIT COURT FOR ARLINGTON COUNTY

JENNA MASON,

Plaintiff,

v.

JACK MASON,

Defendant.

Case No. CL2026-XXXX

UNIFORM PRETRIAL SCHEDULING ORDER

This matter comes upon Plaintiff JENNA MASON's Complaint for Divorce and Defendant JACK MASON's Counterclaim for Divorce. After conference with Judges Chambers regarding the Court's availability, it is ORDERED as follows:

I. Trial

The trial date is set for 3 days beginning December 21, 2026 at 10:00am without a jury. The pretrial conference is set for November 23, 2026 at 9:30 am.

II. Discovery

The parties shall complete discovery, including depositions, by 30 days before trial; however, depositions taken in lieu of live testimony at trial will be permitted until 15 days before trial. "Complete" means that all interrogatories, requests for production, requests for admissions and other discovery must be served sufficiently in advance of trial to allow a timely response at least 30 days before trial. Depositions may be taken after the specified time period by agreement of counsel of record or for good cause shown, provided however, that the taking of a deposition after the deadline established herein shall not provide a basis for continuance of the trial date or the scheduling of motions inconsistent with the normal procedure of the court. The parties have a duty to seasonably supplement and amend discovery responses pursuant to Rule 4:1(e) of the Rules of Supreme Court of Virginia. Seasonably means as soon as practical. No provision of this Order supersedes the Rules of Supreme Court of Virginia governing discovery. Any discovery motion filed shall contain a certification that counsel has made a good faith effort to resolve the matters set forth in the motion with opposing counsel.

IV. TRIAL

KEY POINTS:

TRIAL IS UNPREDICTABLE AND THEREFORE RISKY (IS MY CLIENT A BAD WITNESS? WILL THE JUDGE FAVOR THE OTHER PARTY?)

THE RULES OF EVIDENCE ARE PARTICULARLY CONSTRAINING IN CUSTODY CASES

JACK & JENNA'S 15 YEAR MARRIAGE HAS TO FIT INTO A 3-DAY TRIAL

YOUR CLIENT MAY WANT YOU TO TAKE UNREASONABLE POSITIONS THAT ARE NOT LIKELY TO SUCCEED



start at 2:05 mark; end at 6:45 mark



THANK YOU!

TKLAUZA@BEANKINNEY.COM | MBIEBER@BEANKINNEY.COM

VIRGINIA:

IN THE CIRCUIT COURT OF ARLINGTON COUNTY

JACK MASON,

Plaintiff,

v.

JENNA MASON,

Defendant.

Case No. CL 2026-12345

COMPLAINT FOR DIVORCE

COMES NOW Plaintiff JACK MASON (“Husband”), by counsel, and in support of his Complaint for Divorce from Defendant JENNA MASON (“Wife”) states as follows:

1. The parties were lawfully married on October 4, 2010, in Bluemont, Virginia.
2. There were two children born of the marriage, namely: Molly Mason, born December 2, 2013, and Max Mason, born June 16, 2017. There were no other children born of the marriage, born of either party and adopted by the other, or adopted by both parties. Neither party is currently expecting and neither party is known to be pregnant of the marriage.
3. Both parties are domiciled in and have been *bona fide* residents and domiciliaries of the Commonwealth of Virginia for more than six (6) months preceding the commencement of this suit.
4. Both parties are of sound mind, over the age of eighteen (18) years, and neither of them is currently an active-duty member of the United States Armed Forces. Neither party is incarcerated.

5. The parties have lived separate and apart, without cohabitation and without interruption since on or about June 8, 2025, at which time one or both parties formed the intention to remain permanently separate. Said intent has remained until the present time.

6. There is no hope or probability of reconciliation between the parties.

7. There are issues of child custody and visitation, support, and equitable distribution to be adjudicated by this Court.

8. The Court has jurisdiction to hear and determine the issues outlined herein.

9. In accordance with Virginia Code § 20-146.20, Husband provides the following information relating to the minor children:

a. For the five years preceding this filing: specifically, from January 1, 2021, to present, the minor children have resided with both parties, or with just Wife, at 2311 Wilson Blvd., Arlington, Virginia 22201; from June 8, 2025, to present, the children have also resided with Husband at 3301 Fairfax Drive, Arlington, Virginia 22201.

b. Husband has not participated in any other proceeding concerning the custody or visitation with the minor children. Husband has no information of any other proceeding that could affect the current proceeding, including proceedings for enforcement, domestic violence, protective orders, termination of parental rights, or adoptions in this Court or in any other Court.

c. Husband knows of no other person not a party to this proceeding who has physical custody of the minor children or who claims rights of legal custody, physical custody, or visitation with the minor children.

WHEREFORE, your Plaintiff JACK MASON prays for the following relief:

A. That he be awarded a final order of divorce *a vinculo matrimonii* from Wife based upon separation for a period exceeding one (1) year, pursuant to Va. Code § 20-91A(9);

B. That the parties be awarded joint legal and joint physical custody of the minor children and further that this Court determine a schedule that is in the minor children's best interests, *pendente lite* and permanently;

C. That this Court determine support and maintenance, consistent with the Virginia Child Support Guidelines, for the parties' minor children;

D. That Wife be restrained and enjoined, *pendente lite* and permanently, from harassing, interfering with, molesting, assaulting and/or in any manner threatening or annoying Husband, either directly or indirectly, in person or through others, in any manner or by any means;

E. That Defendant be required to give a full and complete accounting of her assets and liabilities;

F. That the Court determine the legal title, ownership and value of all property of the parties, and which of such property is separate or marital property, and that the Court grant unto Plaintiff a monetary award, and/or direct the conveyance of joint property or partition or sale thereof, pursuant to Va. Code § 20-107.3;

G. That the Court apportion the debts of the parties and/or order the payment of such debts pursuant to Va. Code §20-103 and §20-107.3;

H. That Husband be awarded such further relief as is appropriate, including an award of his fees and costs.

JACK MASON
By Counsel

BEAN, KINNEY & KORMAN, P.C.

By:

Taylor K. Beckelman, Esq. VSB #95851
2311 Wilson Blvd., Suite 500
Arlington, Virginia 22201
(703) 525-4000 (telephone)
(703) 525-2207 (facsimile)
tklauza@beankinney.com
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of June 2026, a copy of the foregoing was sent via fax and email to:

Michelle A. Bieber, Esquire
BEAN, KINNEY & KORMAN, P.C.
2311 Wilson Blvd., Suite 500
Arlington, Virginia 22201
(703) 525-4000 (telephone)
(703) 525-2207 (facsimile)
mbieber@beankinney.com
Counsel for Defendant

Taylor K. Beckelman

V I R G I N I A:

IN THE CIRCUIT COURT FOR ARLINGTON COUNTY

JENNA MASON,

Plaintiff,

v.

JACK MASON,

Defendant.

Case No. CL2026-XXXX

UNIFORM PRETRIAL SCHEDULING ORDER

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II. Discovery.

The parties shall complete discovery, including depositions, by 30 days before trial; however, depositions taken in lieu of live testimony at trial will be permitted until 15 days before trial. "Complete" means that all interrogatories, requests for production, requests for admissions and other discovery must be served sufficiently in advance of trial to allow a timely response at least 30 days before trial. Depositions may be taken after the specified time period by agreement of counsel of record or for good cause shown, provided however, that the taking of a deposition after the deadline established herein shall not provide a basis for continuance of the trial date or the scheduling of motions inconsistent with the normal procedures of the court. The parties have a duty to seasonably supplement and amend discovery responses pursuant to Rule 4:1(e) of the Rules of Supreme Court of Virginia. Seasonably means as soon as practical. No provision of this Order supersedes the Rules of Supreme Court of Virginia governing discovery. Any discovery motion filed shall contain a certification that counsel has made a good faith effort to resolve the matters set forth in the motion with opposing counsel.

III. Designation of Experts.

If requested in discovery, each party's experts shall be identified on or before sixty (60) days before the applicable trial date. If requested in discovery, all experts responsive to matters raised in the opposing party's designation (Counter-Experts) shall be identified on or before 30 days before the applicable trial date. If requested, all information discoverable under Rule 4:1(b)(4)(A)(i) of the Rules of Supreme Court of Virginia shall be provided in each such identification of expert witness or the expert will not ordinarily be permitted to express any non-disclosed opinions at trial. The foregoing deadlines shall not relieve a party of the obligation to respond to discovery requests within the time periods set forth in the Rules of Supreme Court of Virginia, including, in particular, the duty to supplement or amend prior responses pursuant to Rule 4:1(e).

IV. Dispositive Motions.

All dispositive motions shall be presented to the court for hearing as far in advance of the trial date as practical. All counsel of record are encouraged to bring on for hearing all demurrers, special pleas, motions for summary judgment or other dispositive motions not more than 60 days after being filed.

V. Exhibit and Witness List.

Counsel of record shall exchange 15 days before trial a list specifically identifying each exhibit to be introduced at trial, copies of any exhibits not previously supplied in discovery, and a list of witnesses proposed to be introduced at trial. The lists of exhibits and witnesses shall be filed with the Clerk of the Court simultaneously therewith but the exhibits shall not then be filed. Any exhibit or witness not so identified and filed will not be received in evidence, except in rebuttal or for impeachment or unless the admission of such exhibit or testimony of the witness would cause no surprise or prejudice to the opposing party and the failure to list the exhibit or witness was through inadvertence. Any objections to exhibits or witnesses shall state the legal reasons therefor except on relevancy grounds, and shall be filed with the Clerk of the Court and a copy delivered to opposing counsel at least five days before trial or the objections will be deemed waived absent leave of court for good cause shown.

VI. Pretrial Conferences.

Pursuant to Rule 4:13 of the Rules of Supreme Court of Virginia, when requested by any party or upon its own motion, the court may order a pretrial conference wherein motions in limine, settlement discussions or other pretrial motions which may aid in the disposition of this action can be heard.

VII. Motions in Limine.

Absent leave of court, any motion in limine which requires argument exceeding five minutes shall be duly noticed and heard before the day of trial. Motions for an evaluation

date may be heard on a Motion's Day prior to trial through use, when appropriate, of the Court's Briefing Schedule.

VIII. Witness Subpoenas.

Early filing of a request for witness subpoenas is encouraged so that such subpoenas may be served at least 10 days before trial.

IX. Continuances.

Continuances will only be granted by the court for good cause shown.

X. Deposition Transcripts to be Used at Trial.

Counsel of record shall confer and attempt to identify and resolve all issues regarding the use of depositions at trial. It is the obligation of the proponent of any deposition of any non-party witness who will not appear at trial to advise opposing counsel of record of counsel's intent to use all or a portion of the deposition at trial at the earliest reasonable opportunity. Other than trial depositions taken after completion of discovery under Paragraph II, designations of portions of non-party depositions, other than for rebuttal or impeachment, shall be exchanged no later than 15 days before trial, except for good cause shown or by agreement of counsel. It becomes the obligation of the opponent of any such deposition to bring any objection or other unresolved issues to the court for hearing before the day of trial, and to counter-designate any additional portions of designated depositions at least 5 days before such hearing.

XI. Waiver or Modification of Terms of Order.

Upon motion, the time limits and prohibitions contained in this order may be waived or modified by leave of court for good cause shown.

ENTERED this _____ day of _____ 2026.

Arlington Circuit Court Judge

Monthly Income and Expenses of _____

Date: _____

Complaint No: _____

Average Gross Pay per Month

LESS: Federal Taxes

State Taxes

FICA

Health Insurance

Life Insurance

Required Retirement

Average Monthly Net Pay

Other Income

MONTHLY NET INCOME

Employed By	
City & State	
Occupation	
Pay Period	
Next Payday	
Salary/Wage	
# Exemptions	

Children in Household

Name	Age

Household

Mortgage (PITI) or Rent	
Real Estate Property Taxes	
Homeowner's Insurance	
Repairs/Maintenance	
Furniture/Furnishings	

Utilities

Electricity	
Gas/Heating Oil	
Water/Sewer	
Telephone	
Trash	
Cable TV & Internet	

Food

Groceries	
Lunches	

Automobile

Payment/Depreciation	
Gasoline	
Repair/Tags/Inspection, etc.	
Auto Insurance	
Parking/Other Transportation	
Personal Property Tax	

Childcare Expenses

Child Care	
School Tuition	
Lunch Money	
School Supplies	
Lessons/Sports	
New Clothing	

Other Debts with Payments

	Balance	Mo. Pmt.

Large Account Debt

Clothing

New (Excluding Children)	
Cleaning/Laundry	
Uniforms	

Health Expenses

Doctor	
Dentist	
Therapist	
Eyeglasses	
Hospital	
Medicines	
Other	

Dues

Professional Associations	
Social Associations	
Homeowner's Association	

Miscellaneous

Gifts (Xmas, Birthday)	
Church/Charity	
Entertainment	
Vacations	
Hobbies	
Personal Grooming	
Newspaper/Magazines	
Disability Insurance	
Life Insurance	
Legal Expenses	

Totals Per Month

Subtotal Expenses	
Subtotal Debt Payments	
TOTAL EXPENSES	
TOTAL NET INCOME	
BALANCE (+)	
BALANCE (-)	

Liquid Assets on Hand

Cash/Checking/Savings	
Other Liquid Assets	
TOTAL LIQUID ASSETS	

Submitted By: _____

VIRGINIA:

IN THE CIRCUIT COURT OF ARLINGTON COUNTY

JACK MASON,

Plaintiff,

v.

Case No. CL 2026-12345

JENNA MASON,

Defendant.

DEFENDANT’S FIRST INTERROGATORIES TO PLAINTIFF

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- b. The word “person,” used in these Interrogatories, includes both the singular and plural, and includes individuals and entities, natural persons, representative persons, public or private corporations, companies, unincorporated associations, trusts, partnerships, organizations, government entities, or groups, plus any divisions, departments, agencies, or units thereof.
- c. Where the identity or name of a person is requested, state in your answer the full name of the person, present or last known home address and business address, and the person’s daytime telephone number.
- d. “**You**” and “**Your**” refer to Plaintiff JACK MASON and any of his accountants, agents, attorneys, consultants, employees, assigns, and representatives of any description.

e. “Minor Child” and/or “Minor Children” refer to Molly Mason and/or Max Mason.

f. Any requested information, unless privileged, which is known by any of your attorneys, accountants or other agents, acquired while acting on your behalf, shall be given in response to these Interrogatories. To the extent you do not know the precise information requested, provide your best estimate thereof.

g. If additional space is required to fully answer, please continue answer on a separate sheet of paper properly identified (e.g., “continuation of answer to interrogatory number 7”).

h. Except where the context clearly indicates to the contrary, the terms “you,” “your” or other similar constructions refer to the party or parties answering these discovery requests, as well as any employee, agent, servant or other representative acting or purporting to act on behalf of such party.

i. “Describe” or “description” shall mean “identify,” and, when used in reference to any activity, process, occurrence, occasion, conduct, circumstances, communication, transaction, instance, incident or event, also means to specify its nature, substance, form, persons involved, time, place, duration, constituents, and connection, if any, to you and/or any other party to this proceeding.

j. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party’s agents, representatives, and unless privileged, his attorneys.

k. The term “communication” shall mean any oral or written statement or conversation. It shall mean any exchange or transmission of words, symbols, characters, or ideas to another person or entity, including without limitation conversations, discussions, letters, memoranda, meetings, notes, speeches, text messages, email correspondence, Facebook communications and postings, twitter messages, video messages, or other transfer of information -- whether written, oral, electronic, digital, symbolic, audible, visual, magnetic, or otherwise – and regardless of whether such communication is remote or in-person, direct or indirect, formal or informal, or temporary or permanent.

l. The terms “relate” and “related” shall mean constituting, comprising, containing, consisting of, concerning, summarizing, discussing, describing, explaining, setting forth,

proposing, showing, evidencing, disclosing, implying, or authorizing directly or indirectly.

m. “Income” means gross monies and funds (prior to any deductions) from all sources, including, but not limited to, salary, wages, commissions, royalties, bonuses, business distributions, dividends, severance pay, pensions, interest, trusts, annuities, capital gains, investments, social security benefits, workers’ compensation benefits, unemployment insurance benefits, disability insurance benefits, veterans’ benefits, spousal support, rental payments, gifts, prizes and awards.

n. Unless otherwise specified, when construing the scope of these Interrogatories, the terms shall be given their most expansive and inclusive interpretations, including but not limited to:

i. construing the words “and” and “or” in the conjunctive or disjunctive as necessary to make the Interrogatory more inclusive;

ii. construing the words “any” and “all” to mean “any and all” as necessary to make the Interrogatory more inclusive;

iii. construing the past or present tenses of a verb to mean the present or past tenses of the verb, respectively, as necessary to make the Interrogatory more inclusive;

iv. construing the singular forms of the word, respectively, as necessary to make the Interrogatory more inclusive; and

v. construing masculine or feminine pronouns to mean feminine or masculine pronouns, respectively, as necessary to make the Interrogatory more inclusive.

INTERROGATORIES

1. Provide the following information as to all checking, savings, credit union and money market accounts, or CD’s, held in your name, individually or jointly with any other person, at any time subsequent to January 1, 2022 (excluding IRA, KEOGH and 401-K accounts):

Name of Institution	Type of Account	Account No.	How Titled	Balance on 10/4/2010	Balance on 6/8/2025	Present Balance

2. Provide the following information as to all investment accounts such as mutual funds, stocks, bonds, other securities or investment funds (excluding IRA, KEOGH and 401(k) accounts) owned by you, individually or jointly with any other person, at any time since January 1, 2022:

Name of Account	Owner(s)	Value on 10/4/2010	Value on 6/8/2025	Present Value

3. Provide the following information as to all Individual Retirement Accounts (IRA's), 401(k), 403(b), Thrift savings, Simplified Employee Pension Plans (SEP's), Keogh Plans, or any other form of defined contribution plan, held in your name at any time subsequent to January 1, 2022

Name of Institution	Type of Account	Account No.	Balance on 10/4/2010	Balance on 6/8/2025	Present Balance

4. As to each and every pension, retirement, and/or profit sharing plan not disclosed elsewhere in your answers to these Interrogatories, which you will be entitled to receive by virtue of your past and/or current employment, set forth the following:

- a. the plan name, and the name and address of the Plan Administrator;
- b. the date when you became a participant, and if your participation has been terminated, the date of termination;
- c. the number of shares and value of your interest in each of the plan's funds as of the date of marriage, date of separation, and at present;
- d. the dates of your creditable service under the plan, and whether your interest in the plan is vested or non-vested;
- e. the name, address and telephone number of any contributing employer, the amount of said employer's contributions, the present basis or formula for such

contributions, the next scheduled contribution date and the amount due from both employee and employer to your account;

f. your highest three (3) years' base salary for purposes of pension benefit calculation;

g. the amount of benefits and the methods of payment available to you upon retirement, the earliest date upon which you could exercise each such option, and your present beneficiaries; and

h. whether you have received, withdrawn, borrowed or secured a loan with or against any part of such interest, the amount received or encumbered, the conditions imposed upon the transaction by the plan, and the disposition made of such benefits.

5. Provide the following information as to all current credit cards, personal charge accounts, loans and notes payable, and other debts upon which you and/or your spouse are primarily or in any other way liable:

Creditor	Debt Purpose	Account No.	Person(s) Liable	Balance on 6/8/2025	Present Balance	Monthly Payment

6. As to all real estate interests presently held in your name, or previously held in your name and disposed of within the past five (5) years, individually or jointly with any other person including your spouse, provide the following information:

Property Address	How Titled/Held	Acquisition Date	Acquisition Cost/Value	Current Fair Market Value	Mortgage Balance

7. Provide the following information as to all life insurance policies and annuities owned by you or your spouse at any time subsequent to _____:

Company Name	Type of Policy	Insured's Name	Policy No.	Outstanding Loans	Face Value	Beneficiary & % Interest	Surrender Value

8. Provide the following information as to all major items of household furnishings/personal effects having estimated resale value in excess of \$500.00 per item or set (e.g., furniture collections, silver, china, etc.) owned by you and/or your spouse, individually or jointly with any other person:

Description of Item	Name of Owner(s)	Date Acquired	Cost/Value at Acquisition	Present Value

9. Provide the following information as to all motor vehicles, trailers, boats or airplanes owned by you and/or your spouse, individually or jointly with any other person(s), at any time subsequent to January 1, 2022:

Year	Make/Model	Name(s) on Title	Acquisition Cost	Acquisition Date	Present Lien Total	Present Market Value

10. For each asset you claim to be your separate property, or are partially your separate property, provide the following:

- a. Identify of asset for which the claim is made:
- b. Percent or dollar portion you claim to be separate:
- c. State all reasons you contend this portion or percentage is separate:

d. Provide a complete tracing of any of your separate funds into the current property:

e. Identify each person who participated in any transaction which forms a part of the factual basis for your claim, including that person's contact information.

11. The factors set forth below are derived from §20-107.3, Code of Virginia, and are used by the Court in determining the equitable distribution of marital property and/or a monetary award. For each such factor which you claim is important for the Court to consider in determining equitable distribution, state the factor and each such claim, including specific facts, actions, dates of occurrence, persons involved and/or witnessing such events, and any related communications:

a. The contributions, monetary and nonmonetary, of each part to the well-being of the family;

b. The contributions, monetary and nonmonetary, of each party in the acquisition and care and maintenance of such marital property of the parties;

c. The duration of the marriage;

d. The ages and physical and mental condition of the parties;

e. The circumstances and factors which contributed to the dissolution of the marriage, specifically including any ground for divorce;

f. How and when specific items of such marital property were acquired;

g. debts and liabilities of each spouse, the basis for such debts and liabilities, and the property which may serve as security for such debts and liabilities;

h. The liquid or nonliquid character of all marital property;

i. The tax consequences to each party; and

j. Such other factors as the court deems necessary or appropriate to consider in order to arrive at a fair and equitable monetary award.

12. Give the following information regarding your employment for the past five years (please answer separately regarding each job held):

a. Employer's name and address:

- b. Position or title:
- c. Dates of service:
- d. Salary history for past two years:
- e. Present work schedule:
- f. The nature, value and date of all overtime, bonuses, commissions or other compensation in past two years:
- g. Describe all fringe benefits, such as insurance coverage (life, health, dental, etc.), automobile use, vacation and sick leave:
- h. Approximate dates of expected future promotions or reviews within the coming year and the increments in salary anticipated:
- i. If you are employed less than forty (40) hours per week, please specify all reasons why you are not now working full-time:
- j. Reason for termination/cessation of employment:

13. Provide the following information for each source of income (taxable or not), and gifts, unless previously disclosed herein, including, interest, royalties, dividends, rents, pension payments, social security, disability, payments from all trusts and investments, and from inheritances, etc., from which you and/or your spouse received any total payment in excess of \$300 in any twelve month period in the last two years:

Received From	Date	Gross Amount	Reason

14. State your monthly income and expenses in detail, using the attached income and expense statement.

15. The factors set forth below are derived from §20-108.1, Code of Virginia, and are used by the court in determining any deviation from the guideline child support. If you claim the Court should award child support as a deviation from the guideline amount, state each such factor

and claim, including specific facts, actions, dates of occurrence, persons involved and/or witnessing such events, and any related communications:

- a. Actual monetary support for other family members or former family members;
- b. Arrangements regarding custody of the children, including the cost of visitation travel;
- c. Imputed income to a party who is voluntarily unemployed or voluntarily under-employed; provided that income may not be imputed to the custodial parent when a child is not in school, child care services are not available and the cost of such child care services are not included in the computation, and provided further, that any consideration of imputed income based on a change in a party's employment shall be evaluated with consideration of the good faith and reasonableness of employment decisions made by the party, including to attend and complete an educational or vocational program likely to maintain or increase the party's earning potential;
- d. Any child care costs incurred on behalf of the child or children due to the attendance of a custodial parent in an educational or vocational program likely to maintain or increase the party's earning potential;
- e. Debts of either party arising during the marriage for the benefit of the child;
- f. Direct payments ordered by the court for maintaining life insurance coverage, education expenses, or other court-ordered direct payments for the benefit of the child;
- g. Extraordinary capital gains such as resulting from sale of the marital abode;
- h. Any special needs of a child resulting from any physical, emotional or medical condition;
- i. Independent financial resources, if any, of the child or children;
- j. Standard of living for the child or children established during the marriage;
- k. Earning capacity, obligations, financial resources, and special needs of each parent;

- l. Provisions made with regard to marital property under § 20-107.3, where said property earns income or has income-earning potential;
- m. Tax consequences to the parties including claims for exemptions, child tax credit, and child care credit for dependent children;
- n. A written agreement, stipulation, consent order or decree between the parties which includes the amount of child support;
- o. Such other factors as are necessary to consider the equities for the parents and children.

16. If you have health insurance coverage, please provide the following information:
 - a. Monthly premium cost you pay:
 - b. Monthly premium cost of the same insurance for:
 - i. Self-only coverage:
 - ii. Self-plus-spouse coverage:
 - iii. Self-plus-children coverage:
 - c. Name all persons presently covered under your plan:
 - d. Name of insurance carrier, policy number, and employer or group:

17. The factors set forth below are derived from §20-107.1, Code of Virginia, and are used by the court in determining spousal support. For each such factor which you claim is important for the Court to consider in determining spousal support, state each such factor and claim, including specific facts, actions, dates of occurrence, persons involved and/or witnessing such events, and any related communications:

- a. The obligations, needs and financial resources of the parties, including but not limited to income from all pension, profit sharing or retirement plans, of whatever nature;
- b. The standard of living established during the marriage;
- c. The duration of the marriage;

d. The age and physical and mental condition of the parties and any special circumstances of the family;

e. The extent to which the age, physical or mental condition or special circumstances of any child of the parties would make it appropriate that a party not seek employment outside of the home;

f. The contributions, monetary and nonmonetary, of each party to the well-being of the family;

g. The property interests of the parties, both real and personal, tangible and intangible;

h. The provisions made with regard to the marital property under equitable distribution;

i. The earning capacity, including the skills, education and training of the parties and the present employment opportunities for persons possessing such earning capacity;

j. The opportunity for, ability of, and the time and costs involved for a party to acquire the appropriate education, training and employment to obtain the skills needed to enhance his or her earning ability;

k. The decisions regarding employment, career, economics, education and parenting arrangements made by the parties during the marriage and their effect on present and future earning potential, including the length of time one or both of the parties have been absent from the job market;

l. The extent to which either party has contributed to the attainment of education, training, career position or profession of the other party; and

m. Such other factors, including the tax consequences to each party, as are necessary to consider the equities between the parties.

18. If you contend that the other party should have income imputed to him or her, state each reason and each fact supporting such claim.

19. State all facts that you contend the Court should consider relating to custody and visitation of your child(ren), including in your answer a summary of significant events, dates of occurrence, persons involved and/or witnessing such events, and communications of the parties and witnesses relating to those events, and addressing the following factors:

- a. The age and physical and mental condition of the child, giving due consideration to the child's changing developmental needs;
- b. The age and physical and mental condition of each parent;
- c. The relationship existing between each parent and each child, giving due consideration to the positive involvement with the child's life, the ability to accurately assess and meet the emotional, intellectual and physical needs of the child;
- d. The needs of the child, giving due consideration to other important relationships of the child, including but not limited to siblings, peers and extended family members;
- e. The role which each parent has played and will play in the future, in the upbringing and care of the child;
- f. The propensity of each parent to actively support the child's contact and relationship with the other parent, including whether a parent has unreasonably denied the other parent access to or visitation with the child;
- g. The relative willingness and demonstrated ability of each parent to maintain a close and continuing relationship with the child, and the ability of each parent to cooperate in and resolve disputes regarding matters affecting the child;
- h. The reasonable preference of the child, if the court deems the child to be of reasonable intelligence, understanding, age and experience to express such a preference;
- i. Any history of family abuse.
- j. Such other factors as the court deems necessary and proper to the determination.

20. Provide the following information for each childcare provider you have employed or anticipate employing in the future when you need childcare for reasons other than work (e.g.,

social engagements, classes, recreational activities):

- a. Name, address, telephone number, and age of the provider of the care if under 18;
- b. Dates/times used in past year;
- c. Where the care was provided;
- d. Reason(s) for needing child care; and
- e. Any changes in the use of this care provider anticipated in the coming year.

21. Set forth your proposed calendar, including holidays, vacations, and birthdays, when each parent should have each child during the coming year, as well as all reasons for your contention that the proposed calendar is in the best interests of the child.

22. Please identify in detail any and all of Plaintiff's parenting strengths or any parental contributions the Plaintiff has or can provide for the children which you cannot. For each such instance, please be specific.

23. Describe in detail your involvement in the children's education, including all contact with any teachers or childcare providers in the last year.

24. Describe in detail your involvement in the children's extracurricular activities, including all contact with coaches, activity leaders, etc. in the last year.

25. Describe in detail your involvement in the children's medical care, both physical and mental. Specifically list all medical concerns you have and all contact with any health care providers you have had.

26. Describe your residence, including the type of residence (e.g., single family home, townhome, apartment), number of bedrooms, and the sleeping arrangements for each household member when the children are at your residence overnight.

27. Have you at any point within the last 3 years introduced any of the children to any person that you have been or are currently romantically involved with? If so, provide for each such person the following information:

- a. Name and address:
- b. How long you have been, or were, romantically involved with that person:
- c. When you introduced the child(ren) to that person, under what circumstances, and how long you had known the person at the time of the introduction:
- d. The frequency with which this person had, or has, contact with the children, including the amount of time spent with the children during each visit or contact:
- e. The nature of the relationship between the person and either child:
- f. Whether the person has a criminal record, and if so, what activity is on that person's criminal record:
- g. Whether or not the person has ever been in the home overnight at the same time as the child(ren), and if so, on how many occasions:
- h. Whether this person has ever been left alone with the child(ren), and if so, state the date and circumstances of each such occasion:

28. Provide the following information with respect to each expert you intend to call to testify in this case as to any matter at issue in these proceedings:

- a. Identify the expert
- b. State the subject matter of the expert's testimony
- c. If your expert has not provided a curriculum vitae or resume, describe in detail the qualifications of the expert to testify on that subject matter.
- d. State the substance of the facts and opinions to which the expert is expected to testify and provide a summary of the grounds for each opinion.

29. Identify each and every person who has knowledge of facts or information that you assert that the Court should consider on any issue before the Court. As to each individual, provide

the name, address, and telephone number of that person, and the information, facts, dates, events, and circumstances of which said individual has knowledge.

JENNA MASON
By Counsel

BEAN, KINNEY & KORMAN, P.C.

By:

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of July, 2026, a true and correct copy of the foregoing was delivered via facsimile and first-class mail to:

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tklauza@beankinney.com
Counsel for Plaintiff

Michelle A. Bieber

JACK MASON

STATE OF VIRGINIA

CITY/COUNTY OF _____, to-wit:

This _____ day of _____, 2026, personally appeared before me, the undersigned Notary Public, JACK MASON, in the above-referenced matter, and made oath that the foregoing Answers to Interrogatories are true and correct to the best of his knowledge and belief.

Notary Public

My Commission Expires: _____

Notary Registration No.: _____