



FORREST FAMILY LAW

CLIENT'S NAME	
Witness: Name Address, Phone #	
Are you willing to testify in Court for client? How are you employed?	
How do you know Client?	
How do you know the child(ren)?	
How long have you known client?	
When is the last time you were in client's home?	
Is home clean and appropriate for child(ren)-Describe.	
How often are you in client's home?	
How often do you see client with child(ren)?	
How does client discipline child(ren)?	
Describe interaction between client & child(ren) Examples: teaching manners, colors, numbers, reading, help with homework, etc.)	
Describe play activities between client & child(ren)	
Is/Are child(ren) dressed appropriately for occasion/weather?	
Describe any religious activities of client and child(ren) (prayers, grace, church, Sunday School, etc.)	
Describe affection you have	

seen between client and child(ren).	
Who takes child(ren) to medical, dental appointments?	
Do you know opposing party? If yes, how & length of time you have known opposing party?	
Describe client's involvement in child(ren)'s school or day care	
Describe outdoor activities of client/child(ren)	
State anything you believe opposing party will use against client	
Would you trust client to watch your child(ren)?	
What type of meals does cl prepare for child(ren)?	
Does client talk badly about opposing party in front of child(ren)? Explain.	
List anything about opposing party you want attorney to know (whether negative or positive)	

List anything about client you want attorney to know (whether helpful or not)	
Who babysits for child(ren)?	
Who is backup babysitter?	
Is/Are the child(ren) on a schedule?	
Do child(ren) have a bedtime?	
Describe client's use of alcohol, if applicable	
Describe client's use of drugs, if applicable	
Describe any medical or mental condition of client that affects his or her ability to care for child(ren)	
Describe any medical or mental condition of opposing party that affects his or her ability to care for the child(ren)	
Please provide any additional information that you believe the attorney should know (whether you believe it will be helpful or not)	
Do you believe the child(ren) would be better cared for in the primary custody of the client? Why?	

Is there anything you believe opposing party will say about you to try to discredit you as a witness?