



Your Case Against Your Spouse's Paramour

You are potentially asking us to be engaged in an Alienation of Affection and Criminal Conversation case on your behalf. Enclosed, please find the jury instructions for Alienation of Affection, Criminal Conversation, and Punitive Damages that would be read to the jury at the end of the case, if tried.

Our experience shows that each point of these jury instructions needs to be corroborated and supported in three different ways at minimum. If this is on-going conduct we recommend a minimum of three nights of surveillance by a private investigator.

One of the costs that you will incur if this case goes to trial is a mock trial run by our office.

We have also enclosed a questionnaire in this packet. We will need to weigh your evidence, both pro and con, for the purpose of making a recommendation on whether your claims should be filed with the court.

Thank you.

Woodruff Family Law Group



Alienation of Affection and Criminal Conversation
Client Questionnaire

1. What is the name(s) of the person you suspect is involved with your spouse?

2. What lead to your suspicions that your spouse was involved with another person?

3. Have you used a private investigator to investigation your spouse's affair?

4. How long did the private investigator follow your spouse?

5. Do you have written reports or photographs/videos from your private investigator? Please describe.



6. How long do you believe your spouse has been having an affair with the person you wish to sue?

7. Has your spouse had other affairs? How many?

8. Have you had any affairs? Please provide names.

9. Do you have any other evidence (in addition to private investigator items listed above) of your spouse's affair (for example emails, phone records, text messages)?

10. Do you have evidence of the affection that existed between you and your spouse prior to the affair (for example cards, photos, gifts)?



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11. Did you and your spouse have any prior separations? If so, please list the reasons for the prior separations.

12. How did your spouse meet the person they are involved with?

13. Please describe your relationship with your spouse prior to the affair.

14. Have you seen a counselor since learning of your spouse's affair?

15. Have you and your spouse participated in any marriage counseling (either before or after the affair)?

16. Please describe any and all ways you have suffered after learning of the affair.



17. Have you and your spouse reconciled following the affair?

18. Did the affair resume at any point following the reconciliation?

19. Who makes more money and is the primary financial support of your family?

20. Do you have children? If so, who is the primary caregiver?

21. Please describe prior separations from your spouse.

22. Is there any history of domestic violence? Please describe.



23. Has your spouse been involved with other affairs?

24. Will your spouse accuse you of affairs?

25. Do you have cards from your spouse? (Valentines Day, etc.)

26. Have you obtained documentary evidence of the affair? Letters, emails, pictures, videos, cards, credit card bills, hotel records, etc? Please describe.

27. What property does the paramour have? (Important to the assessment of whether you could collect a judgment if you obtained one.)

28. Please type a marital history and include.
