IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

PAPA BEAR,
Petitioner,

and

MAMA BEAR,
Respondent.
_____/

CASE NO.: 2023-01234-FC-04

FAMILY DIVISION (1)

INFORMATION SHEET

PETITIONER:
PAPA BEAR

ADDRESS:
5678 LIGHTHOUSE LANE
MIAMI, FL 01234

PHONE NO:
888-888-8888

EMAIL ADDRESS:
PAPABEAR@GMAIL.COM

BIRTH DATE:
03/03/1971

EMPLOYER:
ENGINEER

RESPONDENT:
MAMA BEAR

ADDRESS:
1234 LIGHTHOUSE LANE
MIAMI, FL 01234

PHONE NO:
777-777-7777

EMAIL ADDRESS:
MAMABEAR@GMAIL.COM

BIRTH DATE:
02/02/1971

EMPLOYER:
NURSE

CHILD:
BABY GIRL BEAR
BABY BOY BEAR

BIRTH DATE:
08/08/08
10/10/10

DADVOCACY: FOR EDUCATIONAL USE

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

PAPA BEAR,
Petitioner,

and

MAMA BEAR,
Respondent.
_____/

CASE NO.: 2023-01234-FC-04

FAMILY DIVISION (1)

CERTIFICATE OF COMPLIANCE WITH MANDATORY DISCLOSURE

I, **PAPA BEAR**, certify that I have complied with the mandatory disclosure required by Florida Family Law Rule 12.285 as follows:

All documents referenced herein were sent to the Petitioner via e-mail to mamabear@gmail.com on April 15, 2023.

FOR INITIAL, SUPPLEMENTAL, AND PERMANENT FINANCIAL RELIEF:

1. Financial Affidavit.

__X Florida Family Law Rules of Procedure Form 12.902(b) (short form)

____ Florida Family Law Rules of Procedure Form 12.902(c) (long form)

- **To be filed under separate cover.**

2. All federal and state income tax returns, gift tax returns, and intangible personal property tax returns filed by the party or on the party's behalf for the past 3 years.
   - **2021-2023 Tax Returns, provided herein.**

3. IRS forms W-2, 1099, and K-1 for the past year, if the income tax return for that year has not been prepared.

4. Pay stubs or other evidence of earned income for the 3 months before service of the financial affidavit.
   - **Paystubs dated January 1, 2023 through April 15, 2023, provided herein.**

5. A statement by the producing party identifying the amount and source of all income received from any source during the 3 months preceding the service of the financial affidavit required by this rule if not reflected on the pay stubs produced.
   - N/A

6. All loan applications and financial statements prepared or used within the 12 months preceding service of that party's financial affidavit required by this rule, whether for the purpose of obtaining or attempting to obtain credit or for any other purpose.

- **N/A**

7. All deeds within the last 3 years, all promissory notes within the last 12 months, and all present leases, in which the party owns or owned an interest, whether held in the party's name individually, in the party's name jointly with any other person or entity, in the party's name as trustee or guardian for any other person, or in someone else's name on the party's behalf.
    - **Lease application dated January 1, 2022, provided herein.**
    - **Lease dated January 15, 2022, provided herein.**

8. All periodic statements from the last 3 months for all checking accounts, and from the last 12 months for all other accounts (for example, savings accounts, money market funds, certificates of deposit, etc.), regardless of whether or not the account has been closed, including those held in the party's name individually, in the party's name jointly with any other person or entity, in the party's name as trustee or guardian for any other person, or in someone else's name on the party's behalf.
    - **Chase Checking account x9999 statement January 1, 2023 through April 15, 2023, provided herein.**
    - **Chase Savings account x8888 statement January 1, 2023 through April 15, 2023, provided herein.**

9. All brokerage account statements in which either party to this action held within the last 12 months or holds an interest including those held in the party's name individually, in the party's name jointly with any person or entity, in the party's name as trustee or guardian for any other person, or in someone else's name on the party's behalf.
    - **Robinhood account x9999 statement April 1, 2022 through April 1, 2023, provided herein.**

10. The most recent statement for any profit sharing, retirement, deferred compensation, or pension plan (for example, IRA, 401(k), 403(b), SEP, KEOGH, or other similar account) in which the party is a participant or alternate payee and the summary plan description for any retirement, profit sharing, or pension plan in which the party is a participant or an alternate payee. (The summary plan description must be furnished to the party on request by the plan administrator as required by 29 U.S.C. § 1024(b)(4).)
    - **Chase Roth IRA account x7777 statement dated April 15, 2023, provided herein.**
    - **Fidelity 401K account x5555 statement dated April 15, 2023, provided herein.**

11. The declarations page, the last periodic statement, and the certificate for all life insurance policies insuring the party's life or the life of the party's spouse, whether group insurance or otherwise, and all current health and dental insurance cards covering either of the parties and/or their dependent children.
    - **Fidelity Life Insurance policy dated April 1, 2023 provided herein.**

12. Corporate, partnership, and trust tax returns for the last 3 tax years if the party has an ownership or interest in a corporation, partnership, or trust greater than or equal to 30%.
    - **N/A**

13. All promissory notes for the last 12 months, all credit card and charge account statements and other records showing the party's indebtedness as of the date of the filing of this action and for the last 3 months, and all present lease agreements, whether owed in the party's name individually, in the party's name jointly with any other person or entity, in the party's name as trustee or guardian for any other person, or in someone else's name on the party's behalf.
    - **American Express credit card account x4444 statements dated April 1, 2022 through April 1, 2023.**

14. All written premarital or marital agreements entered into at any time between the parties to this marriage, whether before or during the marriage. Additionally, in any modification proceeding, each party must serve on the opposing party all written agreements entered into between them at any time since the order to be modified was entered.
    - **N/A**

15. All documents and tangible evidence supporting the producing party's claim that an asset or liability is nonmarital, for enhancement or appreciation of nonmarital property, or for an unequal distribution of marital property. The documents and tangible evidence produced must be for the time period from the date of acquisition of the asset or debt to the date of production or from the date of the marriage, if based on premarital acquisition.
    - **N/A**

16. Any court order directing that I pay or receive spousal support or child support.
    - **Available on docket.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been E-Filed with the clerk of courts and furnished to Mama Bear via e-service to mamabear@gmail.com on this 15th day of April 2023.

PAPA BEAR
5678 Lighthouse Lane
Miami, Florida 01234
(888) 888-8888
papabear@gmail.com

DADVOCACY: FOR EDUCATIONAL USE

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

PAPA BEAR,
Petitioner,

and

MAMA BEAR,
Respondent.
_____/

CASE NO.: 2023-01234-FC-04

FAMILY DIVISION (1)

NOTICE OF FILING PRELIMINARY FINANCIAL AFFIDAVIT

COMES NOW, the Petitioner, **PAPA BEAR**, by and through the undersigned counsel, and hereby files his *Preliminary Financial Affidavit* with the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been E-Filed with the clerk of courts and furnished to Mama Bear via e-service to mamabear@gmail.com on this 15th day of April 2023.

PAPA BEAR
5678 Lighthouse Lane
Miami, Florida 01234
(888) 888-8888
papabear@gmail.com

DADVOCACY: FOR EDUCATIONAL USE

INSTRUCTIONS FOR FLORIDA FAMILY LAW RULES OF PROCEDURE FORM 12.902(b) FAMILY LAW FINANCIAL AFFIDAVIT (SHORT FORM) (10/21)

When should this form be used?

This form should be used when you are involved in a family law case which requires a **financial affidavit and your individual gross income is UNDER $50,000 per year** unless:

(1) You are filing a simplified dissolution of marriage under rule 12.105 and both parties have waived the filing of a financial affidavit;
(2) You have no minor children, no support issues, and have filed a written settlement agreement disposing of all financial issues; or
(3) The court lacks jurisdiction to determine any financial issues.

This form should be typed or printed in black ink. You should **file** this document with the **clerk of the circuit court** in the county where the **petition** was filed and keep a copy for your records.

What should I do next?

A copy of this form must be filed with the court and served on the other party or his or her attorney in your case within 45 days of being served with the petition, if it is not served on him or her with your initial papers. The copy you are serving to the other party must be either mailed, e-mailed, or hand-delivered to the opposing party or his or her attorney on the same day indicated on the certificate of service. If it is mailed, it must be postmarked on the date indicated in the certificate of service. **Service** must be in accordance with Florida Rule of General Practice and Judicial Administration 2.516.

IMPORTANT INFORMATION REGARDING E-FILING

The Florida Rules of General Practice and Judicial Administration now require that all petitions, pleadings, and documents be filed electronically except in certain circumstances. **Self-represented litigants may file petitions or other pleadings or documents electronically; however, they are not required to do so.** If you choose to file your pleadings or other documents electronically, you must do so in accordance with Florida Rule of General Practice and Judicial Administration 2.525, and you must follow the procedures of the judicial circuit in which you file. The rules and procedures should be carefully read and followed.

IMPORTANT INFORMATION REGARDING E-SERVICE ELECTION

After the initial service of process of the petition or supplemental petition by the Sheriff or certified process server, the Florida Rules of General Practice and Judicial Administration now require that all documents required or permitted to be served on the other party must be served by electronic mail (e-mail) except in certain circumstances. **You must strictly comply with the format requirements set forth in the Florida Rules of General Practice and Judicial Administration**. If you elect to participate in

electronic service, which means serving or receiving pleadings by electronic mail (e-mail), or through the Florida Courts E-Filing Portal, you must review Florida Rule of General Practice and Judicial Administration 2.516. You may find this rule at www.flcourts.org through the link to the Rules of General Practice and Judicial Administration provided under either Family Law Forms: Getting Started, or Rules of Court in the A-Z Topical Index.

SELF-REPRESENTED LITIGANTS MAY SERVE DOCUMENTS BY E-MAIL; HOWEVER, THEY ARE NOT REQUIRED TO DO SO. If a self-represented litigant elects to serve and receive documents by email, the procedures must always be followed once the initial election is made.

To serve and receive documents by e-mail, you must designate your e-mail addresses by using the Designation of Current Mailing and E-mail Address, Florida Supreme Court Approved Family Law Form 12.915, and you must provide your e-mail address on each form on which your signature appears. Please **CAREFULLY** read the rules and instructions for: **Certificate of Service (General), Florida Supreme Court Approved Family Law Form 12.914; Designation of Current Mailing and E-mail Address**, Florida Supreme Court Approved Family Law Form 12.915; and Florida Rule of General Practice and Judicial Administration 2.516.

Where can I look for more information?

Before proceeding, you should read "General Information for Self-Represented Litigants" found at the beginning of these forms. The words that are in **"bold underline"** in these instructions are defined there. For further information, see Florida Family Law Rule of Procedure 12.285.

Special notes . . .

If you want to keep your address confidential because you have been found by a judge to be the victim of sexual battery, aggravated child abuse, aggravated stalking, harassment, aggravated battery, or domestic violence, do not enter the address, telephone, and fax information at the bottom of this form. Instead, file **Request for Confidential Filing of Address**, Florida Supreme Court Approved Family Law Form 12.980(h).

The affidavit must be completed using **monthly** income and expense amounts. If you are paid or your bills are due on a schedule which is not monthly, you must convert those amounts. Hints are provided below for making these conversions.

Hourly - If you are paid by the hour, you may convert your income to monthly as follows:

Hourly amount	x	Hours worked per week	=	Weekly amount
Weekly amount	x	52 Weeks per year	=	Yearly amount
Yearly amount	÷	12 Months per year	=	**Monthly Amount**

Daily - If you are paid by the day, you may convert your income to monthly as follows:

Daily amount	x	Days worked per week	=	Weekly amount
Weekly amount	x	52 Weeks per year	=	Yearly amount
Yearly amount	÷	12 Months per year	=	**Monthly Amount**

Weekly - If you are paid by the week, you may convert your income to monthly as follows:

Weekly amount	x	52 Weeks per year	=	Yearly amount

Yearly amount ÷ 12 Months per year = **Monthly Amount**

Bi-weekly - If you are paid every two weeks, you may convert your income to monthly as follows:

Bi-weekly amount x 26 = Yearly amount

Yearly amount ÷ 12 Months per year = **Monthly Amount**

Semi-monthly - If you are paid twice per month, you may convert your income to monthly as follows:

Semi-monthly amount x 2 = **Monthly Amount**

Expenses may be converted in the same manner.

Remember, a person who is NOT an attorney is called a nonlawyer. If a nonlawyer helps you fill out these forms, that person must give you a copy of a **Disclosure from Nonlawyer**, Florida Family Law Rules of Procedure Form 12.900(a), before he or she helps you. A nonlawyer helping you fill out these forms also **must** put his or her name, address, and telephone number on the bottom of the last page of every form he or she helps you complete.

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Case No.: 2023-01234-FC-04
Division: 01

Papa Bear,
Petitioner,
and

Mama Bear,
Respondent.

FAMILY LAW FINANCIAL AFFIDAVIT (SHORT FORM)

(Under $50,000 Individual Gross Annual Income)

I, *{full legal name}* Papa T. Bear, being sworn, certify that the following information is true:

My Occupation: Engineer Employed by: Woodland Engineering Svcs.

Business Address: 6759 Little Forest Lane. Miami. FL 33333

Pay rate: $ 4,000 ☐ every week ☐ every other week ☐ twice a month ☑ monthly ☐ other: _____

☐ Check here if unemployed and explain on a separate sheet your efforts to find employment.

SECTION I. PRESENT MONTHLY GROSS INCOME:
All amounts must be MONTHLY. See the instructions with this form to figure out money amounts for anything that is NOT paid monthly. Attach more paper, if needed. Items included under "other" should be listed separately with separate dollar amounts.

1. $4,000 Monthly gross salary or wages
2. _____ Monthly bonuses, commissions, allowances, overtime, tips, and similar payments
3. _____ Monthly business income from sources such as self-employment, partnerships, close corporations, and/or independent contracts (gross receipts minus ordinary and necessary expenses required to produce income) (Attach sheet itemizing such income and expenses.)
4. _____ Monthly disability benefits/SSI
5. _____ Monthly Workers' Compensation
6. _____ Monthly Unemployment Compensation
7. _____ Monthly pension, retirement, or annuity payments
8. _____ Monthly Social Security benefits
9. _____ Monthly alimony actually received (Add 9a and 9b)
   - 9a. From this case: $ _____
   - 9b. From other case(s): $ _____

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10. _____ Monthly interest and dividends
11. _____ Monthly rental income (gross receipts minus ordinary and necessary expenses required to produce income) (Attach sheet itemizing such income and expense items.)
12. _____ Monthly income from royalties, trusts, or estates
13. _____ Monthly reimbursed expenses and in-kind payments to the extent that they reduce personal living expenses
14. _____ Monthly gains derived from dealing in property (not including nonrecurring gains)
15. _____ Any other income of a recurring nature (list source) _____
16. _____
17. **$** 4,000 **TOTAL PRESENT MONTHLY GROSS INCOME** (Add lines 1–16)

PRESENT MONTHLY DEDUCTIONS:

18. $400 Monthly federal, state, and local income tax (corrected for filing status and allowable dependents and income tax liabilities)
    a. Filing Status SINGLE
    b. Number of dependents claimed 2
19. 50 Monthly FICA or self-employment taxes
20. 50 Monthly Medicare payments
21. _____ Monthly mandatory union dues
22. 50 Monthly mandatory retirement payments
23. 100 Monthly health insurance payments (including dental insurance), excluding portion paid for any minor children of this relationship
24. 200 Monthly court-ordered child support actually paid for children from another relationship
25. _____ Monthly court-ordered alimony actually paid (Add 25a and 25b)
    25a. from this case: $ _____
    25b. from other case(s): $ _____
26. **$** 850 **TOTAL DEDUCTIONS ALLOWABLE UNDER SECTION 61.30, FLORIDA STATUTES** (Add lines 18 through 25)
27. **$** 3,150 **PRESENT NET MONTHLY INCOME** (Subtract line 26 from line 17)

SECTION II. AVERAGE MONTHLY EXPENSES

Proposed/Estimated Expenses. If this is a dissolution of marriage case **and** your expenses as listed below do not reflect what you actually pay currently, you should write "estimate" next to each amount that is estimated.

A. HOUSEHOLD:

Mortgage or rent	$ 1,200
Property taxes	$ 100
Utilities	$ 200
Telephone	$ 50
Food	$ 400
Meals outside home	$ 50
Maintenance/Repairs	$ 50
Other: _____	$ _____

B. AUTOMOBILE

Gasoline	$ 150
Repairs	$ 30
Insurance	$ 200

C. CHILD(REN)'S EXPENSES

Day care	$ 200
Lunch money	$ 0
Clothing	$ 100
Grooming	$ 30
Gifts for holidays	$ 200
Medical/Dental (uninsured)	$ 75
Other: _____	$ _____

D. INSURANCE

Medical/Dental (if not listed on lines 23 or 45)	$ _____
Child(ren)'s medical/dental	$ _____
Life	$ 40
Other: _____	$ _____

E. OTHER EXPENSES NOT LISTED ABOVE

Clothing	$ 100
Medical/Dental (uninsured)	$ _____
Grooming	$ _____
Entertainment	$ _____
Gifts	$ _____
Religious organizations	$ _____
Miscellaneous	$ _____
Other: _____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____

F. PAYMENTS TO CREDITORS

CREDITOR:	MONTHLY PAYMENT
_____	$ _____
Bad Wolf's Toyota Dealership	$ 250
_____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____
_____	$ _____

28. $ 3,425 **TOTAL MONTHLY EXPENSES** (add **ALL** monthly amounts in A through F above)

SUMMARY

29. $ 3,150 **TOTAL PRESENT MONTHLY NET INCOME** (from line 27 of SECTION I. INCOME)

30. $ 3,425 **TOTAL MONTHLY EXPENSES** (from line 28 above)

31. $ _____ **SURPLUS** (If line 29 is more than line 30, subtract line 30 from line 29. This is the amount of your surplus. Enter that amount here.)

32. **($** 275 **) (DEFICIT)** (If line 30 is more than line 29, subtract line 29 from line 30. This is the amount of your deficit. Enter that amount here.)

SECTION III. ASSETS AND LIABILITIES

Use the nonmarital column only if this is a petition for dissolution of marriage and you believe an item is "nonmarital," meaning it belongs to only one of you and should not be divided. You should indicate to whom you believe the item(s) or debt belongs. (Typically, you will only use this column if property/debt was owned/owed by one spouse before the marriage. See the **"General Information for Self-Represented Litigants"** found at the beginning of these forms and section 61.075(1), Florida Statutes, for definitions of "marital" and "nonmarital" assets and liabilities.)

A. ASSETS:

DESCRIPTION OF ITEM(S). List a description of each separate item owned by you (and/or your spouse, if this is a petition for dissolution of marriage). LIST ONLY LAST 4 DIGITS OF ACCOUNT NUMBERS. Check the line next to any asset(s) which you are requesting the judge award to you.		**Current Fair Market Value**	**Nonmarital (check correct column)**	
			Petitioner	Respondent
☑	Cash (on hand)	$ 15	☑	☐
☑	Cash (in banks or credit unions)	1,000	☑	☐
☐	Stocks, Bonds, Notes		☐	☐
☐	Real estate: (Home)		☐	☐
☐	(Other)		☐	☐
☑	Automobiles	25,000	☑	☐
☐	Other personal property		☐	☐
☐	Retirement plans (Profit Sharing, Pension, IRA, 401(k)s, etc.)		☐	☐
	Other			
☐			☐	☐
☐			☐	☐
☐			☐	☐
☐			☐	☐
☐			☐	☐
☐			☐	☐
	☐ Check here if additional pages are attached.			
Total Assets (add next column)		$ 26,015	☐	☐

B. LIABILITIES:

DESCRIPTION OF ITEM(S). List a description of each separate debt owed by you (and/or your spouse, if this is a petition for dissolution of marriage). LIST ONLY LAST 4 DIGITS OF ACCOUNT NUMBERS. Check the line next to any debt(s) for which you believe you should be responsible.	Current Amount Owed	Nonmarital (check correct column)	
		Petitioner	Respondent
☐ Mortgages on real estate: First mortgage on home	$	☐	☐
☐ Second mortgage on home		☐	☐
☐ Other mortgages		☐	☐
☐		☐	☐
Auto loans			
☑ Toyota Camry	10,000	☑	☐
Charge/credit card accounts			
☐		☐	☐
☐		☐	☐
☐		☐	☐
Other			
☐		☐	☐
☐		☐	☐
☐		☐	☐
____Check here if additional pages are attached.			
Total Debts (add next column)	$ 10,00	☐	☐

C. CONTINGENT ASSETS AND LIABILITIES:

INSTRUCTIONS: If you have any **POSSIBLE assets** (income potential, accrued vacation or sick leave, bonus, inheritance, etc.) or **POSSIBLE liabilities** (possible lawsuits, future unpaid taxes, contingent tax liabilities, debts assumed by another), you must list them here.

Contingent Assets Check the line next to any contingent asset(s) which you are requesting the judge award to you.	Possible Value	Nonmarital (check correct column)	
		Petitioner	Respondent
☐	$	☐	☐
☐		☐	☐
Total Contingent Assets	**$**	☐	☐

Contingent Liabilities Check the line next to any contingent debt(s) for which you believe you should be responsible.	Possible Amount Owed	Nonmarital (check correct column)	
		Petitioner	Respondent
☐	$	☐	☐
☐		☐	☐
Total Contingent Liabilities	**$**	☐	☐

SECTION IV. CHILD SUPPORT GUIDELINES WORKSHEET
(Florida Family Law Rules of Procedure Form 12.902(e), Child Support Guidelines Worksheet, MUST be filed with the court at or prior to a hearing to establish or modify child support. This requirement cannot be waived by the parties.)

[Check **one** only]
__✓__ **A Child Support Guidelines Worksheet IS or WILL BE filed in this case.** This case involves the establishment or modification of child support.
____ **A Child Support Guidelines Worksheet IS NOT being filed in this case.** The establishment or modification of child support is not an issue in this case.

I certify that a copy of this document was [**check all used**]: (✓) e-mailed ( ) mailed ( ) faxed ( ) hand delivered to the person(s) listed below on *{date}* April 15, 2023.

Other party or his/her attorney:
Name: Mama Bear
Address:
City, State, Zip:
Telephone Number:
Fax Number:
E-mail Address(es): mamabear@gmail.c

Under penalties of perjury, I declare that I have read this document and the facts stated in it are true.

Dated: April 15, 2023

Signature of Party
Printed Name: Papa Bear
Address:
City, State, Zip:
Telephone Number:
Fax Number:
E-mail Address(es): papabear@gmail.com

IF A NONLAWYER HELPED YOU FILL OUT THIS FORM, HE/SHE MUST FILL IN THE BLANKS BELOW:
[fill in **all** blanks] This form was prepared for the: *{choose only **one**}* ( ) Petitioner ( ) Respondent
This form was completed with the assistance of:
{name of individual} _____,
{name of business} _____,
{address} _____,
{city} _____, *{state}* ____, *{zip code}* _____, *{telephone number}* _____.

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

PAPA BEAR,
Petitioner,

and

MAMA BEAR,
Respondent.
_____/

CASE NO.: 2023-01234-FC-04

FAMILY DIVISION (1)

NOTICE OF FILING CERTIFICATE OF PARENTING CLASS COMPLETION

COMES NOW, the Petitioner, **PAPA BEAR**, by and through the undersigned counsel, and hereby files his *Certificate of Parenting Class Completion* with the Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been E-Filed with the clerk of courts and furnished to Mama Bear via e-service to mamabear@gmail.com on this 15th day of April 2023.

PAPA BEAR
5678 Lighthouse Lane
Miami, Florida 01234
(888) 888-8888
papabear@gmail.com

DADVOCACY: FOR EDUCATIONAL USE

IMPORTANT INFORMATION

This is your certificate of completion of our course. It is your responsibility to deliver this certificate to the judge assigned to your case.

Papa Bear
5678 Lighthouse Lane
Miami, FL 01234

Woodland Creatures Parenting

221 E. Little Forest Lane - Suite 123
Orlando, FL 32101
305-331-5555

Certificate of Course Completion

Woodland Creatures Parenting certifies tbat the person named below has completed tbe following:

Woodland Creatures Co-Parenting Course

Student Information: Papa Bear
5678 Lighthouse Lane
Miami, FL 01234

Date of Birth:	03/03/1971
Date of Completion:	04/07/2023
County Filed:	Dade
Case Number:	2023-001234-FC-04

Goldilocks (Dec 5, 2023 14:17 EST)

School Official: **Goldilocks**

Certificate#: **PFSC01234321**

DADVOCACY: FOR EDUCATIONAL USE

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

PAPA BEAR,
Petitioner,

and

MAMA BEAR,
Respondent.
_____/

CASE NO.: 2023-01234-FC-04

FAMILY DIVISION (1)

PETITIONER'S REQUEST FOR PRODUCTION

The Petitioner, **PAPA BEAR,** by and through the undersigned counsel, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, serves this demand for production of documents upon the Respondent, **MAMA BEAR.**

You are required to produce all of the documents requested in the list attached as "**Schedule A**." Such production is to be made to Papa Bear, at papabear@gmail.com, within no more than thirty (30) days from the date of service hereof. It is not necessary to reproduce any documents already produced as part of mandatory disclosure. These documents shall be produced as they are kept in the usual course of business or identified in a manner corresponding to the specifications in this request. **Unless otherwise indicated, production is required from January 1, 2021 to present.**

DATED: March 15, 2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been E-Filed with the clerk of courts and furnished to Mama Bear via e-service to mamabear@gmail.com on this 15th day of March 2023.

Papa Bear
5678 Lighthouse Lane
Miami, Florida 01234
(888) 888-8888
Papabear@gmail.com

DADVOCACY: FOR EDUCATIONAL USE

INSTRUCTIONS

1. Unless stated otherwise, requests are for the time period of **January 1, 2020 to present**.

2. "Persons" means any natural person or entity, including without limitation, any individual, firm, corporation, company, association, partnership, business, public agency, department, bureau, board, commission, or any other form of public, private or legal entity.

3. The term "documents" means all writings of any kind, including but not limited to the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise, including (without limitation) correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, inter-office and intra-office communications, telephone calls, meetings or other communications, bulletins, printed matters, computer printouts, teletypes, telecopier, invoices, worksheets and all drafts, alterations, modifications, changes, amendments of any of the foregoing, graphic or aural writs, records or representations of any kind, including (without limitation) photographs, charts, graphs, microfiche, microfilm, videotapes, recordings, motion pictures and electronic, mechanical, or electric records or representations of any kind, including (without limitation) tapes, cassettes, and disc recordings.

4. "Communication" means any oral, written or electronic (including e-mail, text messages, voice messages, voice recording) statement, dialogue, colloquialism, discussion, conversation or agreement.

5. "Relating to" shall be intended to mean: containing, constituting, showing, mentioning, reflecting, or pertaining or referring in any way, directly or indirectly, to and is meant to include, among other documents, documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any documents called by each request.

6. If any party withholds any documents covered by this Request by reason of a claim of privilege, a list is to be furnished identifying each document for which the privilege is claimed together with (a) the name of it author or preparer and identification by employment and title of each such person; (b) the name of each person who was sent or furnished with the document or who has received, viewed, or has had custody of the document; together with an identification of each such person; (c) a brief description of the document; (d) a statement of the basis for het claim of privilege; and (e) the paragraph of this Request to which the document relates. In the case of any document relating in any way to a meeting or to any other conversation, all participants in the meeting or conversation are to be identified.

7. Please organize and label documents produced to correspond with the numbered paragraph in this Request or produce all requested documents in the manner in which they are regularly maintained in your files. You are requested to produce documents and things under your control, whether currently in your possession or not.

8. These Requests are continuing. If after producing documents, you become aware of other documents responsive to these Requests, you are required to produce such additional documents promptly.

Schedule "A"

1. **MANDATORY DISCLOSURE:** All mandatory disclosures pursuant to Rule 12.285 of the Florida Family Rules of Procedure, unless recently previously provided.

2. **FINANCIAL AFFIDAVIT:**

   a. A completed Financial Affidavit required by the Florida Rules of Civil Procedure/ Florida Law Rules of Procedure in the present type of action, unless recently previously provided.
   b. Any documents relied upon by you in preparing your financial affidavit, not otherwise produced pursuant to this request, unless recently previously provided.

3. **TAX RETURNS AND INFORMATION:**

   a. **Federal Income Tax Returns.** Copies of all returns, including amended returns, for the last two (2) years whether the same be in your name individually or jointly with anyone else.
   b. **Partnership Tax Returns.** Copies of all partnership tax returns of any and all partnerships in which you hold an interest for the last two (2) years.
   c. **Corporate Tax Returns.** Form 1120 and copies of all federal and state income tax returns and profit and loss statements for any and all private and closely held corporations, joint ventures, business entities, or other corporations where you have a shareholder's interest of the issued capital stock or professional associations in which you hold an interest or held an interest for the last two (2) years.
   d. **Income Records.** Records reflecting gross income and net income received by you either directly or indirectly for the last two (2) years, as well as your employee earnings records prepared by your employer for the last twelve (12) months.
   e. **Deferred Income Records.** All records in regard to any deferred income, deferred salary, and/or deferred commissions.
   f. **Federal Gift Tax Returns.** Copies of all Federal Gift Tax Returns filed by you, and worksheets in connection therewith for the past two (2) years.
   g. **Personal Property Tax Returns (intangible).** Copies of all returns filed in Florida or any other jurisdiction for or by you and worksheets in connection therewith, for the last two (2) years.
   h. **Personal Property Tax Returns (tangible).** Copies of all returns filed in Florida or any other jurisdiction for or by you and worksheets in connection therewith, for the last two (2) years.
   i. **Real Estate Tax Notice.** The most recent Real Estate Tax Notice indicating the assessed values for tax purposes of any and all real property held by you either individually, jointly with any other person or entity, or under your control, including all rental properties.

4. **IRS FORMS**: IRS forms, W-2, 1099, and K-1 for the past year, if the income tax return for that year has not been prepared. This request shall include any and all such documents, whether individually or jointly, with any other person and/or entity, or by any corporation, partnership, and/or other business organization and/or entity in which you have an interest.

5. **ANSWERS TO INTERROGATORIES**: Answer to Interrogatories found in Family Law Form 12.930(b).

6. **FINANCIAL STATEMENTS:** Any and all financial statements prepared within the last two (2) years, in your possession or under your control, whether in your name individually or jointly with anyone else.

7. **LOAN AND CREDIT APPLICATIONS:** All financial statements, net worth statements and application submitted to banks, lending institutions or any other persons or entities, which were prepared by you or on your behalf and statements of loan accounts for all loans, home equity lines of credit, and or credit card application applied for, whether approved or not for the last two (2) years, whether in your name individually or jointly with anyone else.

8. **BANKING INFORMATION:** Any and all of the following items which are in your possession or under your control, whether held individually or jointly with anyone else, or in which you have an interest, or any account in which you have the right to withdraw any funds, whether or not your name appears on said account, wherever said account is located, be it international or domestic, for the last two (2) years, involving any financial institution:

a. **Accounts.** Including, but not limited to the following accounts:
    a. Checking Accounts
    b. Savings Accounts
    c. Corporate or other Business Accounts
    d. Certificates of Deposit
    e. Money Market Funds
    f. Ready Cash Accounts
    g. Credit Union Accounts
    h. Any other similar accounts

b. **Records.** All records and documents involving the above accounts, including but not limited to the following:
    a. All monthly statements
    b. All deposit slips
    c. All withdrawal slips
    d. All canceled checks
    e. Check stubs and Check registers
    f. All savings account books
    g. All credit union account books
    h. Copies of all Certificates of Deposit
    i. All other similar records

c. **Checks and Money Orders.** All cashier's checks, money order, or certified checks, whether in your name individually or jointly with anyone else.

9. **INVESTMENT AND OBLIGATION INFORMATION:**

a. **Brokerage Account Statements.** All records, including but not limited to statements and other documents involving any stock, bond, mutual fund, and note or security ownership in which you either individually or jointly with anyone else have or had an interest in during the last two (2) years.

b. **Stocks.** All corporate securities owned personally by you for the last two (2) years.

c. **Bonds.** All Bonds of any description in your possession or under your control, whether in your name individually or jointly with anyone else, for the last two (2) years.

d. **Mutual Funds**. All mutual funds of any description in your possession or under your control, whether in your name individually or jointly with anyone else, for the last two (2) years.
e. **Notes of Securities.** All Notes or other securities either in your possession or under your control, whether in your name individually or jointly with anyone else, for the last two (2) years.
f. **Account Records.** All records in regard to any investment accounts in your possession or under your control whether in your name individually or jointly with anyone else, for the last two (2) years.
g. **Obligations Records.** All records in regard to any current outstanding obligations upon which you are individually or jointly liable with anyone else, in your possession or under your control, for the last two (2) years.

10. **INSURANCE:**
a. **Life Insurance.** All life insurance policies held by, obtained by or for the benefit of you in any way.
b. **Medical Insurance.** All medical, dental and hospitalization policies.
c. **Other Insurance.** All insurance policies held by, obtained by or for the benefit of you in any way, including but not necessarily limited to all policies of all motor vehicles or boats driven by you, all policies covering in any way casualty, liability, theft, or otherwise, all property including real or personal, all jewelry floaters, all hospital, medical, income, or disability policies.

11. **MONIES OWED TO YOU OR BY YOU:**
a. All correspondence, promissory notes, contracts, or other writings, or copies thereof, that show or document any monies owed to you or monies that you presently owe or have owed any other person or entity regardless of whether said monies are still due and owing.
b. All records, including notes, mortgages (including home equity lines of credit, second and / or subsequent mortgages), or any other evidence of debt, security, or collateral, in regard to any obligation, which are owing by you either individually or jointly.

12. **JUDGMENTS:** Copies of all judgments you presently hold against any other person or entity or which you held against any person or entity and judgments that have been or are now held by any other person or entity against you, regardless of whether said judgments have been satisfied.

13. **CREDIT CARDS:** All receipts, records of payments, bills, invoices, checks evidencing payments, as well as any other documents, correspondence or memoranda in your possession or under your control involving all credit cards which you might have used for the last two (2) years, whether or not the specific charges were authorized or signed by you or by any other party, including but not limited to the following: Visa, MasterCard, American Express, Discover, international credit cards and department store credit cards.

14. **PENSION PLANS:** All records and documents in regard to any retirement fund, trust fund, profit sharing plan, pension plan, IRA account, KEOGH plan, 401K, mixed plans, international pension plans, other retirement or deferred earning accounts or plans, or any other similar plan involving you, including but not limited to the following documents:

a. A copy of all of the plan and trust documents.
b. Copies of 5500/500-C, 500-B and 5500_SSA, if applicable, for the past two (2) years.
c. Copy of the trust asset statement as of the most recent plan anniversary.
d. Copy of the most recent Summary Plan Description.
e. If there are individual insurance or annuity contracts in force in the plan, a copy of the actual contract.
f. Copy of the record of the individual account balance as of the last valuation date of any profit sharing or defined contribution plan, and for the last two (2) years.
g. Copy of the latest actuarial valuation specifying cost methods and all actuarial assumptions being used for any defined benefit pension plans.
h. Copy of any Notes signed for loans taken from the plan.
i. Copy of any withdrawals taken from the plan or account.
j. Copy of any direct deposit documentation for the plan.

15. **REAL ESTATE:**

a. All records in regard to any real property, either owned or leased, either individually or jointly with anyone else, either within or outside of the United States, for the last two (2) years, including but not limited to the Deed, Closing Statements, copies of any Notes and/or Mortgages, title insurance policies, tax bills, paid tax receipts, appraisals, guarantees, security agreements, leases, and any other evidence (including monthly payments and present principal and interest balances) evidencing any type of interest or ownership, whether as owner, co-owner, fiduciary, trust beneficiary (vested or contingent), partner, limited partner, shareholder, joint venture, mortgagee, developer, manager or otherwise, for the last two (2) years; together with evidence of all contributions or deposits, in cash or otherwise made by you or on your behalf, toward the acquisition of such real estate for the last two (2) years, and any sale and option agreements on any real estate owned by you either individually, through another person or entity, jointly or as trustee or guardian.
b. All records and other documents related to any rental properties owned by you either individually or jointly including names of all tenants and all current and past leases for the past two years.
c. All records and other documents of any appraisals or evaluations of any of the above real property, including any appraisals done for ad valorem tax purposes by any governmental body.

16. **MORTGAGES AND NOTES:** All records, including notes, mortgages or any other evidence of any security or collateral, in regard to any obligations which are owing to or by you either individually or jointly with any person, firm or corporation whether for your homestead property or

any other rental properties owned by you either individually or jointly with any person, firm or corporation.

17. **PERSONAL PROPERTY:**

a. Documents of title, including Bills of Sale, for all personal property, owned individually or with other persons, including automobiles, boats, airplanes, furniture, antiques, jewelry, stamps and coin collections, during the current year and the past two (2) years.
b. All records, inventories and appraisals of any collections, such as but not limited to coin collections, stamp collections, jewelry collections, etc.
c. All records, inventories and appraisals of any gold, silver or platinum in your possession or under your control whether held in your name individually or jointly with anyone else.
d. Schedule of all personal furniture, fixtures, furnishings and equipment owned individually or jointly during the last two (2) years.

18. **VEHICLES:** Any and all documents related to the lease or purchase of vehicles, including but not limited to the lease agreement, purchase agreement, lease application, purchase application, financing agreement, financing application, and all forms filled out. All information provided to the dealership relating to leasing a vehicle. Any and all insurance policies for those vehicles. Any and all traffic tickets, including parking, received in the past two (2) years.

19. **FICTITIOUS NAMES:** A list of any and all fictitious names under which you are presently doing business or have been doing business for the last ten (10) years and the state and counties where said names are registered.

20. **PARTNERSHIP AND JOINT VENTURE AGREEMENTS:** Any and all agreements to which you have been a party.

21. **EMPLOYMENT RECORDS/CONTRACTS:** All correspondence, documents, statements, contracts, or other writing showing the amounts you have received as salary or dividends from any business that has employed you or in which you have an interest within the last three (3) years, including international businesses, and all employment contracts under which you are performing services and/or merchandise and materials already finished, including a list or description of any oral contracts.

22. **FRINGE BENEFITS:** All records evidencing any benefits available to you from any company that has employed you or business entity in which you have a legal or equitable ownership interest, including international businesses, including, without limitation to auto, travel, entertainment, educational and personal living expenses within the last three (3) years.

23. **PASSPORTS:** Your original passport or passports that you have held in the last three (3) years, and passport or passports held for the minor children subject to this proceeding in the last two (2) years.

24. **TRUSTS:**

a. **Documents.** Any trust, along with any amendments and modifications thereto, in which you individually or jointly with anyone else have an interest or in which you are a Trustee, along with the most up-to-date financial records in regard to said Trust which lists the assets, liabilities and income.

b. **Records.** All of the following records in regard to any Trust in which you have been a Trustee or Co-Trustee.

   a. Records of all accounts in any financial institutions, money market funds, ready cash accounts, or other similar accounts, including monthly statements, deposit slips, withdrawal slips, canceled checks, savings accounts, certificate of deposit, and all other similar records for the last two (2) years.

   b. All financial statements, all annual accountings, all lists of inventories of assets, and Federal and State tax returns involving said Trust for the last two (2) years.

c. **Charts and Graphs.** Any and all charts, graphs, records, documents, ledgers, drawings, or any other similar items, which have either been prepared by you or prepared by someone else, that you have in your possession or under your control, involving any of the issues involved in this action, including but not limited to any such items indicating the amount of personal expenses or costs incurred by you or your spouse, during the last two (2) years.

25. **DISABILITY/PENSION:** All records and documents in regard to any disability pension or other income or any other similar plan involving you, including but not limited to the following documents:

a. A copy of all of the plan and trust documents with all amendments, modifications and changes.

b. A copy of all the documents that you initially signed, as well as any similar documents or amendments thereto involving any disability plan or income.

c. If there are individual insurance or annuity contracts in force in the plan, a copy of the actual contracts.

d. A copy of the most recent account balances as of the last valuation date.

e. If there have been any loans on the plan in the last three (3) years, or any loans on the plan that you are currently paying towards, a copy of all documents in support of the loan.

f. If you have cashed in, or received any lump sum payments, or any other similar type action involving any disability plan or income, a copy of all documents relating to the same.

g. A copy of all documents indicating whether you did or did not elect to provide survivor benefits to any person.

h. All documents evidencing your rights in regard to providing survivor benefits.

26. **POWER OF ATTORNEY:** A copy of all Powers of Attorney or similar instruments involving you and any recession, amendments or cancellation of the same.

27. **EXPERT WITNESSES:** A list of the names and address of all proposed expert witnesses and copies of all written reports rendered to you or your attorney by any such purposed expert witness.

28. **SAFE DEPOSIT BOX:** Copies of all records, including but not limited to contracts for the rental and/or lease, of any safe deposit box used or maintained by you or your spouse during the last two (2) years and all records of the contents and location of each safe deposit box.

29. **GIFTS:** Records pertaining to any gifts received by you during the last two (2) years (limit to gifts with a value of $300.00 or more).

30. **PROBATE DOCUMENTS:**

a. Records pertaining to any inheritance received by you during the last two (2) years.
b. The original or true copy of your Last Will and Testament and of any Codicils or amendments thereto. All Wills and trust documents in which you are or were named either as principal or agent.

31. **APPRAISALS:** Any appraisals, written inventories, lists and/or descriptions of any real or personal property owned or held by you made within the last five (5) years.

32. **CHILD SUPPORT:** Any and all records evidencing any child support payments that you have made or received in this case since the date of separation through the date of production, including but not limited to cancelled checks and/or receipts.

33. **CHILD'S EDUCATION/EXTRACURRICULAR ACTIVIES/CARE:** Any and all records relating to the minor child's schooling and extracurricular activities, including but not limited to the following documents:

a. Report cards, progress reports, notes or reports from teachers, coaches, tutors, or religious teachers, standardized testing results;
b. A list of all teachers, tutors, coaches, religious teachers, or extracurricular activity providers with names, contact information, and role;
c. Any and all documents, including payment, related to the children's transportation, including but not limited to bus, carpool, Uber, or other transportation mechanism;
d. Any and all schedules related to the children's activities, including but not limited to extracurricular activities and timesharing.
e. Copies of any and all documents sent ***to and from all of the children's past and present nannies/babysitters/caretakers***, including, but not limited to: job postings, job applications, daily schedule; emergency contact information provided for the nanny/babysitter/caretaker; and any all paychecks, payroll records, receipts, cancelled checks, or other documentation evidencing payment made to all of the children's past or present nannies/babysitters/caretakers, even if such payment was made by a third party payroll company.
f. Any and all documentation related to applications to high school for the elder child, including forms completed (both electronically and hard copy), emails sent and received, and letters sent and received.

34. **CHILD'S MEDICAL:** Any and all records relating to the children's medical history, including but not limited to a list of doctors, immunizations, evaluations, appointments, hospital stays, x-rays, and prescriptions.

35. **MEDICAL:** Any and all records relating to your mental health provider, including but not limited to appointments and prescriptions.

36. **ATTORNEY'S FEES:** Produce any billing statements and any retainer agreements entered into between you and any law firm including the law firm representing you in these proceedings. And any and all records relating to fees paid to your attorney in this action.

37. **RESIDENCE:** Full names and dates of birth for all residents of the Petitioner's primary residence.

DADVOCACY: FOR EDUCATIONAL USE

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

PAPA BEAR,
Petitioner,

and

MAMA BEAR,
Respondent.
_____/

CASE NO.: 2023-01234-FC-04

FAMILY DIVISION (1)

PETITIONER'S REQUEST FOR UPDATED MANDATORY DISCLOSURE

COMES NOW, the Petitioner, **Papa Bear**, by and through undersigned counsel, pursuant to Rule 12.285, Florida Family Law Rules of Procedure, serves this demand of production of updated responses to Mandatory Disclosure upon the Respondent.

You are required to produce all the documents requested in the Mandatory Disclosure attached as "**Schedule A**". Such production is to be made to Papa Bear, at papabear@gmail.com, within no more than thirty (30) days from the date of service hereof. It is not necessary to produce any response previously produced in this case which contains no further change. These documents shall be produced as they are kept in the usual course of business or identified in a matter corresponding to the specification in this request. **Unless otherwise indicated, Updated Mandatory Disclosure is required from the date of last production, which was December 2022.**

DATED: December 1, 2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been E-Filed with the clerk of courts and furnished to Mama Bear via e-service to mamabear@gmail.com on this 15th day of March 2023.

Papa Bear
5678 Lighthouse Lane
Miami, Florida 01234
(888) 888-8888
Papabear@gmail.com

SCHEDULE A

DEFINITIONS

1. "Persons" means any natural person or entity, including without limitation, any individual, firm, corporation, company, association, partnership, business, public agency, department, bureau, board, commission, or any other form of public, private or legal entity.

2. The term "documents" means all writings of any kind, including but not limited to the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise, including (without limitation) correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, inter-office and intra-office communications, telephone calls, meetings or other communications, bulletins, printed matters, computer printouts, teletypes, telecopier, invoices, worksheets and all drafts, alterations, modifications, changes, amendments of any of the foregoing, graphic or aural writs, records or representations of any kind, including (without limitation) photographs, charts, graphs, microfiche, microfilm, videotapes, recordings, motion pictures and electronic, mechanical, or electric records or representations of any kind, including (without limitation) tapes, cassettes, and disc recordings.

3. "Communication" means any oral, written or electronic (including e-mail, text messages, voice messages, voice recording) statement, dialogue, colloquialism, discussion, conversation or agreement.

4. "Relating to" shall be intended to mean: containing, constituting, showing, mentioning, reflecting, or pertaining or referring in any way, directly or indirectly, to and is meant to include, among other documents, documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any documents called by each request.

DOCUMENTS REQUESTED

1. **Updated/Amended Financial Affidavit:** Updated/Amended Financial Affidavit in conformity with Rule 12.285 of the Florida Family Law Rules of Procedure.

2. **Financial Affidavit Supporting Documents:** Any documents relied upon by you in preparing your financial affidavit, not otherwise produced pursuant to this request.

3. **Updated/Supplemental Disclosure of All Other Mandatory Disclosure Documents**: Updated/Supplemental disclosure of all Mandatory Disclosure documents (other than the Financial Affidavit addressed in Request No. 1 herein) in conformity with Rule 12.285 of the Florida Family Law Rules of Procedure.

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

PAPA BEAR,
Petitioner,

and

MAMA BEAR,
Respondent.
_____/

CASE NO.: 2023-01234-FC-04

FAMILY DIVISION (1)

PETITIONER'S EX-PARTE MOTION TO COMPEL MANDATORY DISCLOSURE

COMES NOW, the Petitioner, **PAPA BEAR,** by and through undersigned counsel, and hereby files this *Ex-Parte Motion to Compel Mandatory Disclosure* and as grounds therefore, states as follows:

1. The Petitioner filed a *Request for Production* on March 15, 2023.

2. Under the Florida Family Law Rules of Procedure Rule 12.285(b)(2), the time frame for filing mandatory disclosure and supporting documentation has expired. Said documents were due on or about April 14, 2023.

3. Mandatory disclosure documents are now past due.

4. To date, no Motion for Enlargement of Time has been filed.

5. The Respondent has failed to comply with the Florida Family Law Rules of Procedure 12.285, in that the required documents in accordance with the rules governing Mandatory Disclosure have not been provided to the Petitioner.

6. The Petitioner requests reasonable attorney's fees under Florida Rules of Civil Procedure 1.380(a)(4).

WHEREFORE, the Petitioner prays this Honorable Court will enter an Order granting this *Motion to Compel Mandatory Disclosure*, awarding attorney's fees and any further relief deemed just and equitable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been E-Filed with the clerk of courts and furnished to Mama Bear via e-service to mamabear@gmail.com on this 15th day of April 2023.

Papa Bear
5678 Lighthouse Lane
Miami, Florida 01234
(888) 888-8888
Papabear@gmail.com

DADVOCACY: FOR EDUCATIONAL USE

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

PAPA BEAR,
Petitioner,

and

MAMA BEAR,
Respondent.
_____/

CASE NO.: 2023-01234-FC-04

FAMILY DIVISION (1)

ORDER GRANTING THE PETITIONER'S EX-PARTE MOTION TO COMPEL MANDATORY DISCLOSURE

THIS CASE came to be heard on the Petitioner's *Ex-Parte Motion to Compel Mandatory Disclosure*, and the Court, having reviewed the court file and the *Motion*, and being otherwise fully advised in the premises, finds that:

IT IS ORDERED AND ADJUDGED:

1. The Petitioner's *Motion to Compel Mandatory Disclosure* is hereby GRANTED.

2. The Respondent shall comply with the Rules of Civil Procedure and the Florida Family Law Rules of Procedure and produce mandatory disclosure to counsel for the Petitioner no later than ten (10) days after entry of this Order.

3. This Court reserves jurisdiction to enforce this Order.

4. This Court reserves ruling on attorney's fees.

DONE AND ORDERED in Chambers at Miami-Dade County, Florida this __ day of _____, 2023.

_____
CIRCUIT COURT JUDGE

Copies furnished to:

Papa Bear; papabear@gmail.com
Mama Bear; mamabear@gmail.com

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