

Post Office Box 2980 Colorado Springs Colorado 80901		JUL 29 2003
Phone Number:		
In Re:		
Petitioner:	Barbara Ann Robbins	LEE V. COLE, JR. CLERK OF COURT
v.		
Respondent/Co-Petitioner:	Douglas Everett Robbins	▲ COURT USE ONLY ▲
Attorney or Party without Attorney	Barbara A. Robbins 6660 Delmonico Dr D-261 Colorado Springs CO 80919	Case No. 02 DR 3915
Phone Number: 719-337-7033	E-mail: <a href="mailto:barobbins@msn.com">barobbins@msn.com</a>	Division No. 14 Y Courtroom:
<p align="center"><b>PETITIONER'S RESPONSE TO CO-PETITIONER'S PATTERN INTERROGATORIES TO PETITIONER</b></p>		

COMES NOW, Barbara A. Robbins, Petitioner pro se in the above captioned case, and offers the following as her response to Co-Petitioner's pattern interrogatories. Referring to Co-Petitioner's request line-by-line, Petitioner does state and aver as follows:

1. Petitioner is a self-employed real estate broker and part-time tax accountant. Petitioner is paid on commission only for real estate services, and per return for tax work. All clients are obtained individually, and all other portions of question one are irrelevant to the Petitioner's profession.
2. Petitioner has no pension plan of any kind.
3. Petitioner would certainly hope that she were making more money next year than this; however, there are no guarantees. Petitioner's income could remain the same, or go down.
4. Objection. This question is beyond the scope of a settlement hearing.
5. Objection. This question is irrelevant to the production of a workable settlement agreement.
6. Objection. This question is beyond the scope of a settlement hearing.
7. There are none.
8. All outstanding debts of the Petitioner are included on Petitioner's Affidavit with respect to Financial Affairs, and included with this document in the form of a spreadsheet workpaper.



10. The only person that owes money to the Petitioner is the Co-Petitioner.
11. Objection. This question is irrelevant to the production of a workable settlement agreement.
12. None that I recall; however, all items on the attached listing of marital property in the possession of Petitioner have been accounted for, either physically or monetarily.
13. This question is a duplicate of the questions in Petitioner's response to Co-Petitioner's request for production of documents, and is already stated for the record.
14. This question is answered in Petitioner's response to the production of documents requested by the Co-Petitioner..
15. None that I recall.
16. There is a safe deposit box at Community Banks of Cripple Creek. I believe the only document in it is a limited liability agreement for a now-defunct company.
17. See the attached spreadsheet workpaper.
18. The real property listed as 156 Panorama Circle was lost to foreclosure in July of 2003.
19. None that I recall.
20. None.
21. No health insurance.
22. No.
23. I received distributions from my late father's estate, included on my financial affidavit. To all other details of this question, I object, since it is beyond the scope of this settlement agreement.
24. None that I recall.
25. The two vehicles included on my financial affidavit are my separate property. They were purchased separately, after the date of filing of this case, purchased with no marital funds, and no liability to the Co-Petitioner occurred.
26. See question 23, above. I receive distributions of the estate of my late father, any details beyond that are objected to as being beyond the scope of this settlement agreement.



27. I am not.

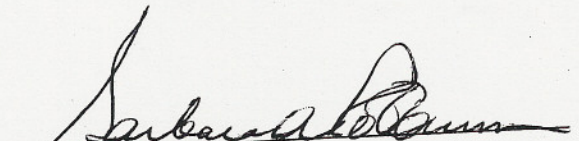
28. This information is included in Petitioner's response to Co-Petitioner's request for documents.

29. These details are included in Petitioner's response to Co-Petitioner's request for documents.

Respectfully submitted this 29<sup>th</sup> day of July, 2003.

Dated: \_\_\_\_\_

July 29 2003

  
Barbara A. Robbins, Petitioner pro se



Addendum to response to Request for documents dated JULY 29, 2003

IMPORTANT NOTE!!! Petitioner has no way of knowing any figures in Co-Petitioner's column!

ALL FIGURES ARE BASED ON THE LAST FIGURES I HAVE KNOWLEDGE OF!!!!

CURRENT POSITION		as of JUNE 30, 2003				
	FMV	Encumbrances	Equity	Petitioner	Co-petitioner	
<b>Assets</b>						
156 Panorama	350,000.00	350,000.00	0.00	foreclosed		
18033 CR 1	275,000.00	235,000.00	40,000.00	20,000.00	20,000.00	
		<small>1st mort 115K 2nd mort 100K costs 20K</small>				
1999 Ford F-350	26,000.00	0.00	26,000.00		26,000.00	
1998 UNI trlr	5,000.00	0.00	5,000.00		5,000.00	
1996 US Cargo trlr	7,700.00	0.00	7,700.00		7,700.00	
car hauler trailer	1,200.00	0.00	1,200.00		1,200.00	
Prowler camper	1,000.00	0.00	1,000.00	1,000.00		
1980 SeaRay	11,000.00	0.00	11,000.00	11,000.00		
Harley Davidson	15,000.00	0.00	15,000.00		15,000.00	
Household possessions	104,237.50	0.00	104,237.50	41,737.50	62,500.00	
Stocks	50.00	0.00	50.00	25.00	25.00	
Bank accounts	62,000.00	0.00	62,000.00		62,000.00	
Citibank VISA		(13,500.00)	0.00	(11,500.00)		
Per MBNA credit card		(13,000.00)	0.00	(11,500.00)		
Advanta card		(1,600.00)	0.00	(1,000.00)		
Security Service card		(13,000.00)	0.00		(13,000.00)	
GMAC (lease payoff)		(3,750.00)	0.00		(3,750.00)	
Citibank MasterCard		(1,250.00)	0.00		(1,250.00)	
MBNA business		(3,510.00)	0.00		(3,510.00)	
American Express		(4,000.00)	0.00		(4,000.00)	
Operations		(9,128.38)	0.00	(9,128.38)		
Bus COGS		(12,600.00)	0.00	(12,600.00)		
Legal		(41,711.00)	0.00	(41,711.00)		
			273,187.50	(13,676.88)	173,915.00	

POSITION AFTER ORIGINAL SETTLEMENT						
	FMV	Encumbrances	Equity	Petitioner	Co-	
<b>Assets</b>						
156 Panorama	350,000.00	350,000.00	0.00	FORECLOSED		
18033 CR 1	275,000.00	215,000.00	40,000.00	40,000.00		
1999 Ford F-350	26,000.00	0.00	26,000.00	26,000.00		
Prowler camper	1,000.00	0.00	1,000.00	1,000.00		
Red cargo trlr	5,000.00	0.00	5,000.00			
car hauler trailer	1,200.00	0.00	1,200.00			
White cargo trlr	7,700.00	0.00	7,700.00			
SeaRay boat	11,000.00	0.00	11,000.00	11,000.00		
HD motorcycle	15,000.00	0.00	15,000.00			
Household possessions	104,237.50	0.00	104,237.50	41,737.50	62,500.00	
Stocks	50.00	0.00	50.00			
Bank Accounts	62,000.00	0.00	62,000.00			
Settlement judgment	31,000.00			31,000.00	(31,000.00)	
Personal Debt		(49,510.00)	0.00	(24,000.00)	(24,000.00)	
Business Debt		(63,439.38)		(63,439.38)		
			273,187.50	63,298.12	96,748.62	