

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI**

**ANGELA
FREINER**

Petitioners,))14SL-DR02617-01
)Division :31 JAMES S JUDY) Respondent.)

**INSTRUCTIONS INTERROGATORIES DIRECTED TO PETITIONER
AND RESPONDENT**

COMES NOW Guardian ad Litem, and exhibits the following Interrogatories to be

answered by Petitioner and Respondent, in writing and under oath, in accordance with

the Rules of Civil Procedure.

In answering these Interrogatories, all information is to be divulged which is possessed by or available to you, your attorneys, investigators, agents, or others employed by or acting in your behalf.

The Interrogatories are intended to be of a continuing nature, requiring you to serve timely supplemental answers setting forth any information, within the scope of these Interrogatories, which may be acquired by you, your attorneys, investigators, agents, or others employed by or acting in your behalf, following the original answers

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STATE OF MISSOURI**

**ANGELA
FREINER**

Petitioners,)
) 14SL-DR02617-01
)Division :31 JAMES S JUDY) Respondent.)

FIRST SET OF INTERROGATORIES TO THE PETITIONER AND RESPONDENT

COME NOW, Guardian ad Litem, Venus A. Jackson, pursuant to Rule 57.01 of the Missouri

Rules of Civil Procedure, and propound the following Interrogatories to Petitioner's:

1. Regarding the individual answering these interrogatories, state the following:

a. Full Name, address, and telephone number;
and

PETITIONER'S ANSWER:

**Angela M Freiner 8547
Pilot Ave St. Louis, Mo
63123 314.405.4979**

ANSWER

:

**Venus A. Jackson, 7584 Olive Blvd Ste. 201, University City, MO 63130
314-721-7230**

**RESPONDENT'S
ANSWER:**

**FREINER V
JUDY**

2. State the full name and address of all persons providing information to answer these

interrogatorie
s.

**PETITIONER'S ANSWER:
Angela M Freiner 8547
Pilot Ave St. Louis, Mo
63123**

**RESPONDENT'S
ANSWER:**

ANSWER

:

**Venus A. Jackson, 7584 Olive Blvd Ste. 201, University City, MO 63130
314-721-7230**

3. State the address of all previous residence where you have resided for the five years, and

the dates you resided at each such address, and the name and relationship to you of each

person residing with you at each your previous addresses.

PETITIONER'S ANSWER:

**2015-2016 6633 Weber
St. Louis, Mo. 63123
Dalilah Judy-Daughter**

**8547 Pilot Ave St. Louis,
Mo. 63123 Dalilah
Judy-Daughter**

FREINER V
JUDY

**RESPONDENT'S
ANSWER:**

ANSWER:
n/a

4. Who is Steven Scott? Please list his name, address and phone number.

PETITIONER'S ANSWER:
**Steven Scott Judy is
James Judy's father. His
address and phone
number are unknown to
me.**

**RESPONDENT'S
ANSWER:**

FREINER V
JUDY

**ANSWER: Not known to the
GAL**

5. Where you aware that Mr. Steven Scott was sex offender? If so?
when

PETITIONER'S ANSWER:

**Yes. I looked him up in
November of last year
when James took Dalilah
there for Thanksgiving
break.**

**RESPONDENT'S
ANSWER:**

ANSWER: May 31, 2020 via email from Ms.

Freiner.

**FREINER V
JUDY**

6. Please provide dates in which minor was in Arkansas, where she stayed.

**PETITIONER'S ANSWER:
May 31, 2020 to June 5,
2020**

**RESPONDENT'S
ANSWER:**

FREINER V
JUDY

**ANSWER: Not known to the
GAL**

7. List any illegal substances used in the last 90
days.

**PETITIONER'S ANSWER:
Marijuana**

**RESPONDENT'S
ANSWER:**

FREINER V

JUDY

ANSWER:

n/a

8. Provide Delilah's grades and attendance record from 2019-2020 school year.

PETITIONER'S ANSWER:

**95% attendance rate
grades were not given
the last quarter of school
due to the covid 19
epidemic. Third quarter
grades were Science
92% Soc. Studies 75%
English 90% Math 51%
Art 100% Choir 100% PE
100%**

**RESPONDENT'S
ANSWER:**

FREINER V
JUDY

**ANSWER: Not known to the
GAL**

9. Please provide information on any arrest, convictions or probation in the last 2 years.

**PETITIONER'S ANSWER:
N/A**

**RESPONDENT'S
ANSWER:**

FREINER V

JUDY

ANSWER:

n/a

10. Please provide all caregivers for the minor child in the last year.

PETITIONER'S ANSWER:

N/A

RESPONDENT'S

ANSWER:

FREINER V
JUDY

**ANSWER: Not known to the
GAL**

11. Please list the number of times you communicated with the other parent about major

issues in Delilah's life. (example, travel, grades and disciplinary actions at school)

PETITIONER'S ANSWER:

We do not speak often.

The last time we discussed anything of importance was the neurologist to take Dalilah to and that was over 6 months ago.

**RESPONDENT'S
ANSWER:**

FREINER V
JUDY

ANSWER: Not known to the

GAL

12. Please list the witness you may have at trial.

PETITIONER'S ANSWER:

**RESPONDENT'S
ANSWER:**

**ANSWER:
None.**

13. Your current employment.

PETITIONER'S ANSWER:

All 4 Corners Cleaning

FREINER V
JUDY

**RESPONDENT'S
ANSWER:**

**ANSWER:
None.**

14. List the number of days you have the child alone with a caretaker. Provide information

whether notified the other parent about the extended period of said leave.
Provide

caretakers'

name.

PETITIONER'S ANSWER:

N/A

**RESPONDENT'S
ANSWER:**

FREINER V
JUDY

ANSWER:

None.

15. Please list your significant other's or spouse name and address.

PETITIONER'S ANSWER:

N/A

**RESPONDENT'S
ANSWER:**

**ANSWER:
N/a**

**FREINER V
JUDY**

**Respectfully
submitted,**

– Venus A. Jackson,
#59872 7584 Olive Blvd,
Ste. 201 University City,
MO 63130 314-721-7230
Phone 314-496-4612 Fax
Guardian Ad Litem
Venusesquire@sbcglobal.
net

SWORN SIGNATURE

STATE OF MISSOURI))ss

COUNTY OF)

I, Angela Freiner, certify under penalty of perjury that above Answers to Interrogatories are complete, true, accurate, and correct to the best of my knowledge and belief. I am aware of the criminal penalties for perjury and false affidavits under RSMo 575.040, 575.050, and 575.060, which provide for imprisonment up to five years and/or fine of up to \$5,000. _____

The foregoing Answers to Interrogatories were subscribed and sworn to before me

this _____

day of _____,
2020.

____ Notary Public

**My Commission
Expires**

FREINER V
JUDY
SWORN SIGNATURE

STATE OF MISSOURI))ss

COUNTY OF)

I, James S Judy, certify under penalty of perjury that above Answers to Interrogatories are complete, true, accurate, and correct to the best of my knowledge and belief. I am aware of the criminal penalties for perjury and false affidavits under RSMo 575.040, 575.050, and 575.060, which provide for imprisonment up to five years and/or fine of up to \$5,000. _____

The foregoing Answers to Interrogatories were subscribed and sworn to before me
this _____

day of _____,
2020.

____ Notary Public

**My Commission
Expires**

FREINER V
JUDY
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was via emailed to all parties this 4 June
2020 to:

Kathleen E. Shaul

Law Offices of Kathleen E. Shaul,
PC

7710 Carondelet Ave., Suite
401

St. Louis, Missouri 63105

314.863.9955
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Calling All 4 Corners

angelafriener@gmail.co
m

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JUDY