

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT  
FRANKLIN COUNTY, ILLINOIS

IN RE: THE MARRIAGE OF	)	
	)	
LINDA SUE SHELTON,	)	
	)	
Petitioner,	)	
	)	
vs.	)	No. 05-D-30
	)	
DANNY LEE SHELTON,	)	
	)	
Respondent.	)	

**ANSWERS TO INTERROGATORIES**  
**DIRECTED TO RESPONDENT**

Now comes the Respondent, Danny Lee Shelton, by his attorney, Timothy R. Neubauer of Neubauer, Hanson & Overstreet, P.C., and answers the Interrogatories Directed to Respondent received from the Petitioner, Linda Sue Shelton, as follows:

OBJECTION - The Respondent objects to each Interrogatory, #1, #2, #4-#8 inclusive, and #13-#18 inclusive, wherein the Petitioner inquires about a seven year period. The Illinois Supreme Court has promulgated Standard Matrimonial Interrogatories pursuant to Supreme Court Rule 213(j), and that said Standard Matrimonial Interrogatories provides for a party to investigate and disclose information for a period of three years, not seven years. At each request for information for seven years, the Respondent objects as the information requested is irrelevant, immaterial and unduly burdensome to produce.

- (b) 4 times a year
- (c) varies
- (d) varies
  
- (a) Remnant Publishing, royalties, Coldwater, Michigan
- (b) 4 to 6 times a year
- (c) varies
- (d) varies

3. Do you own any interest in real estate? If so, with regard to each such interest state the following:

- (a) The size and description of the parcel of real estate, including improvements thereon;
- (b) The name, address and interest of each person who has or claims to have an ownership interest in the parcel of real estate;
- (c) The date your interest in the parcel of real estate was acquired;
- (d) The consideration you transferred or paid for your interest in the parcel of real estate;
- (e) Your estimate of the current fair market value of the parcel of real estate and your interest therein; and
- (f) The amount of any indebtedness owed on the parcel of real estate and to whom.

ANSWER: Yes

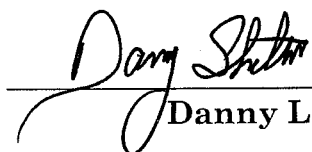
- (a) 18 acres located at 2954 New Lake Road, West Frankfort
- (b) Danny Lee Shelton, 2954 New Lake Road, West Frankfort  
Merlin Fjarli
- (c) 2004
- (d) \$150,000.00 was paid to the Petitioner, Linda Sue Shelton.  
\$50,000.00 was paid to MidCounty Bank Mortgage to pay off the mortgage they held in the real estate.
- (e) \$275,000.00, per appraisal
- (f) \$200,000.00 to Merlin Fjarli

4. For the preceding seven years, list the names and addresses of all associations, partnerships, corporations, enterprises or entities in which you have had

**VERIFICATION BY CERTIFICATION**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

DATED: 8/18, 2006.

  
\_\_\_\_\_  
Danny Lee Shelton