

VIRGINIA: IN THE CIRCUIT COURT FOR THE COUNTY OF LOUISA

THOMAS ALEXANDER GARRETT, JR.,

Plaintiff,

v.

Case No. CL19-000417-00

FLANNA SHERIDAN GARRETT,

Defendant.

**PLAINTIFF'S ANSWERS TO SECOND
SET OF INTERROGATORIES**

COMES NOW the Plaintiff, Thomas Alexander Garrett, Jr., by counsel, and for his Answers to Defendant's Second Set of Interrogatories, respectfully states as follows:

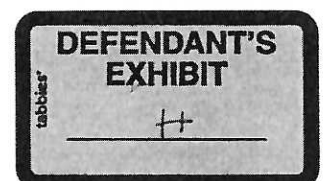
1. Identify every issue, fact, or circumstance that supports your position that you and Defendant need to engage in additional co-parenting. For example, include all times you, or Defendant, have failed to communicate or failed to agree in a manner that was contrary to Sheridan's best interests that you think could have been avoided by co-parenting counseling. For each incident alleged, set forth all people who have personal knowledge of those events.

ANSWER:

Issues, facts, and circumstances include but are not limited to:

Defendant will not, despite being asked multiple times over the period of well over a year, tell Plaintiff the nature or circumstances of well over a dozen trips with child to pediatrician, instead suggesting that "we let the lawyers work this out," or that "I should ask her doctor." Plaintiff has on his own, obtained records from doctor, which simply say "pediatrician visit" or similar. As such, child has well over a dozen medical appointments about which Plaintiff knows nothing, nor will Defendant share information on said visits.

Defendant will not produce proof of insurance for child for nearly two years. Defendant refused to disclose details of the insurance that she was ordered to procure for child despite Plaintiff asking multiple times. Plaintiff was never given any specifics on



whether or not child had health insurance and was even show caused for failure to pay medical expenses, despite the fact that Defendant failed to disclose well over a dozen medical, dental, and therapeutic appointments, and when asked about these, defendant refused also to provide Plaintiff with any relevant data.

Defendant has repeatedly defied Court order taking child for medical, dental, and therapeutic care without plaintiff's knowledge or consent. These visits include aforementioned doctor's visits, as well as visits with a therapist named Balzer or similar, who father specifically objected to, but who Defendant took child to anyway. Plaintiff was never informed of these visits by Defendant.

Defendant refuses to disclose child's night terrors and other disturbing behavior to Plaintiff, disclosing only the abstract fact that "sometimes she has night terrors," without disclosing dates, specifics, or frequency.

Defendant refuses to provide a list of foods that child enjoys, instead, repeatedly saying "ask her yourself" or "I am not going to play gotcha and have you tell me that she no longer likes a particular food," despite the fact that Plaintiff has never done any such thing.

Defendant yelled at Plaintiff in front of child for coming too close to her car with child during an exchange despite the fact that there is no evidence that Plaintiff is, has been, or ever would be in any way threatening.

Defendant and defendant's agents have routinely scolded Plaintiff for things he has never done, essentially 'gaslighting' to shirk responsibility and to create a false perception of reality.

Child has routinely stated things like "Mom loves me more than you" or "Mom says you'll let me drown" or "Mom says you'll leave me in the car and it will turn into an oven and I'll die."

Defendant told child "Mimi has gone to be with God" following an incident where Plaintiff's mother (Mimi) had a stroke and left the residence in an ambulance. When child later saw Mimi, she was baffled that Mimi was still alive because "Mom told me that Mimi went to be with God."

Defendant has threatened Plaintiff for sending text messages and seeking clarification on simple coparenting tasks like child exchanges, when Defendant had previously been unresponsive on OFW, but Defendant has no hesitation on using similar communication methods when roles are reversed.

2. Do you fear for your life, property or safety because of Defendant, or do fear for the life, property or safety of Sheridan due to the Defendant? If so, identify all

facts, dates, and circumstances that you claim justify this fear. For each incident alleged, set forth all people who have personal knowledge of those events.

ANSWER:

Defendant is mentally unstable at times and has a family history of bipolar and borderline personality disorder as disclosed by Defendant during the marriage. This is born out by Defendant's statements on counseling that she has attended as well as Defendant's mother. Defendant had a series of books on dealing with these mental illnesses that she left at Plaintiff's when she left the relationship and admitted that these books were hers during the intake for Sheridan's play therapy.


Defendant has frequently broken into fits of rage that include physical violence and destructive behavior targeting herself and others. Defendant has for example, slashed her own skin with her nails until she was bleeding. She has done the same to Plaintiff during these fits of rage. On one occasion, when plaintiff locked himself in a room with his two older children to escape one of these fits of rage, Defendant kicked the door in in front of Plaintiff and Plaintiff's frightened children. On another occasion, while holding child who was a newborn, and in front of Plaintiff's family to include by not limited to Plaintiff's sister, Defendant went in and out of a rage for over an hour, screaming obscenities at Plaintiff while holding child.

Plaintiff as a songwriter, took great pride in a song entitled "Fire" in which she wrote a chorus about a past relationship that is as follows: "You hurt me, I hate you, I hope that you die... In a fire."

The House Ethics Committee staff produced a 300 plus page report where in it did not report a single abusive or angry text sent by Plaintiff, but produced numerous rage-filled texts from Defendant including invective, insults, and implicit threats towards staff and others. The Washington Post and other outlets outlined these facts and as such the number of people with knowledge is indeterminate, though plaintiff would submit that Defendant is more familiar with the nature and recipients of her vitriol than is Plaintiff.

Throughout the course of these proceedings, and before, defendant has shown a willingness to say and do anything to benefit her desired ends without regard to the veracity of the statement or allegation.

Respectfully Submitted,
THOMAS ALEXANDER GARRETT, JR.
By Counsel




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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of December, 2021, Plaintiff's Answers to Defendant's Second Set of Interrogatories were hand-delivered to:

Jason P. Seiden, Esquire
MichieHamlett
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Charlottesville, VA 22902
Counsel for Defendant



Christopher J. Smith

