

Lebanon and therefore the Maronite Court does not provide "an adequate remedy" as set forth in 12 O.S. 140.3(2).

4. The Respondent also alleges that the maintenance of this action would not work a substantial injustice to Petitioner. The Petitioner lives in Tulsa, Oklahoma and the marriage has real and personal property in Oklahoma and other states in the United States. The convenience is all on the side of the Petitioner for an action continuing in Tulsa, Oklahoma. If there is a need for appraisals on disputed values these appraisals would occur in Oklahoma and other states within the United States.
5. There are fact issues relating to Petitioner's Motion to Dismiss that can only be properly determined after a hearing which is currently scheduled by the Court for February 22, 2016, at 9:00 a.m.

WHEREFORE, premises considered, Respondent requests the Court overrule the Petitioner's Motion to Dismiss.

Respectfully Submitted:

JAMES A. WILLIAMSON,
Attorney at Law



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DISTRICT COURT RULE 4(C) VERIFICATION

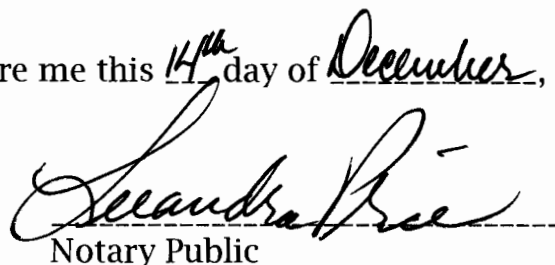
James A. Williamson, as counsel of record for Respondent, of lawful age being first duly sworn upon oath, deposes and states that he has read the above and foregoing Motion and that to the best of his knowledge and belief, he reasonably believes that upon a hearing on the above and foregoing Motion, the proof will show that the factual statements contained therein are correct, as provided by District Court Rule 4(C).

I state under penalty of perjury under the laws of Oklahoma that the foregoing is true and correct.



James A. Williamson, OBA# 9698
Date: December 14, 2015
Place: Tulsa, Oklahoma

SUBSCRIBED AND SWORN to before me this 14th day of December,
2015.



Notary Public

My Commission Expires: 1/24/18

My Commission Number: #14000872