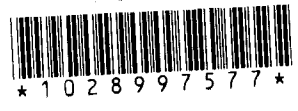


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IN THE DISTRICT COURT AND FOR TULSA COUNTY

IN RE THE MARRIAGE OF [REDACTED] STATE OF OKLAHOMA

DISTRICT COURT
FILED
MAR 26 2015

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

Case No. [REDACTED]

[REDACTED]

Petitioner,

and

[REDACTED]

Respondent.

ATTORNEYS LIEN CLAIMED

RESPONSE AND CROSS-PETITION

Comes now [REDACTED], by and through his attorneys of record James W. Feamster, III and Adam P. Carroll, with the law firm Feamster & Carroll, PLLC., and for his Response and Cross-Petition he states as follows:

RESPONSE

For his Response to Petitioner's Petition For Dissolution Of Marriage, Respondent states as follows:

1. Respondent admits that the following paragraphs of Petitioner's Petition For Dissolution Of Marriage Decree and Automatic Temporary Injunction Notice are true: Paragraphs 1,2,3,4,5,7,8,9, and 12.
2. Respondent can not admit nor deny the allegations in paragraph 11 of Petitioner's Petition For Dissolution Of Marriage Decree and Automatic Temporary Injunction Notice.
3. Respondent denies the allegations in paragraphs 6, 10, 13, and 14 of Petitioner's Petition For Dissolution Of Marriage Decree and Automatic Temporary Injunction Notice and demands strict proof thereof.
4. Respondent admits paragraphs 1,2,3,5,6,7, and 8 with respect to the UCCJEA VERIFICATION.
5. Respondent denies paragraphs 4 of the UCCJEA VERIFICATION and demands strict proof thereof.
6. For further response to Petitioner's Petition, reference is made to the allegations hereinafter set forth in Respondent's Cross-Petition all of which are incorporated herein by reference.

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CROSS-PETITION

For his Cross-Petition against Petitioner, Respondent states as follows:

1. Petitioner and Respondent were lawfully married on May 1, 2007. Two children have been born of the marriage, to wit: H.L.F. born March 13, 2007 and T.E.F. born January 27, 2014 Petitioner is not pregnant.

2. Respondent is entitled to dissolution of marriage/divorce from Petitioner by reason of the adultery by Petitioner and/or incompatibility of the parties each to the other. Both parties have resided in Oklahoma for more than six consecutive months immediately preceding the filing hereof and this Court has dissolution of marriage/divorce subject matter jurisdiction herein. Both parties reside in this county and venue is proper herein.

3. Jurisdiction is present in this Court to hear and determine all issues pertaining to the minor children of the parties and all such jurisdiction should be exercised herein. More particularly, Respondent states that:

A. Oklahoma is the "home state" of the parties' minor children and each of them as that phrase is defined by Oklahoma's Uniform Child Custody Jurisdiction and Enforcement Act, 43 O.S. §551-101 et seq., and by the federal Parental Kidnapping Prevention Act, 28 U.S.C. §1738A, and by Oklahoma's Uniform Interstate Family Support Act, 43 O.S. §601-101 et seq. Under said acts, Oklahoma and this Court has jurisdiction to hear and determine all issues pertaining to the custody, visitation and support of the minor children.

B. Further, it is in the best interest of the parties' minor children that this Court assume custody, visitation and support jurisdiction under said acts because the minor children and these parties each have significant connections with this state and there is available in this state substantial evidence concerning the children's's present and future care, protection, training and personal relationships. No other state has child custody, visitation and/or support jurisdiction. Each such category of jurisdiction should be exercised herein.

C. No person other than the parties hereto has or claims to have any custody or visitation rights concerning the parties' minor children or any of them. While the minor child is of Native American Decent. Neither Oklahoma's Indian Child Welfare Act, 10 O.S. §40.1 et seq., nor the federal Indian Child Welfare Act, 25 U.S.C. §1901 et seq., apply to this proceeding. Other than this action, no other action has been filed in this or any other state in which the custody, visitation or support of the minor children has been at issue and Petitioner has not participated in any such other litigation as a party, witness or in any other capacity.

D. Since birth, the minor children have resided at the following locations and with the following persons: with both parties at From 2007 to 2011 at Hwy. 48 in Mannford,

Oklahoma, from 2011 to 2013 at 1109 W. Caddo, Cleveland, Oklahoma and from 2012 to present at 26303 W. 16th Pl. #12, Sand Springs, Oklahoma

4. It is in the best interests of the mental, physical and moral welfare of the minor children that custody be awarded to the Respondent or in the alternative to the Petitioner and Respondent jointly

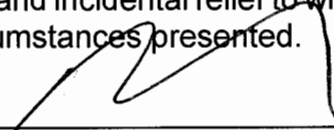
5. Both parties should be ordered to provide financial support for the minor children and child support should be set in accordance with Oklahoma's Child Support Guidelines, 43 O.S. §118 and §119. Health care expenses, including all reasonable and necessary medical, dental, orthodontic, optometric, psychological, or any other physical or mental health expenses of the minor children incurred by either parent and not reimbursed by insurance, and all work or school related child care expenses concerning said minor children should be divided between the parties proportionately in the parental income ratios established by Oklahoma's Child Support Guidelines.

6. Each party should be awarded and set aside all of his or her separate property and the same should not be accounted for or included in the Court's division of the parties' marital estate. Respondent should be allowed All items of marital property and marital debt should be identified and valued and should be equitably divided between the parties according to law.

7. Respondent is not possessed with the financial resources from which to pay his reasonable and necessary attorney fees, costs and litigation expenses herein. Respondent is entitled to an award against Petitioner for his reasonable and necessary attorney fees, costs and litigation expenses herein.

8. Reference is made to Respondent's Application for Temporary Order filed contemporaneously herewith. All of the allegations contained therein are adopted and are incorporated herein by reference, even as though here fully set forth.

Wherefore, Respondent requests that he be granted a dissolution of marriage/divorce from Petitioner; that he be granted all relief above set forth; and that Respondent be granted all other ancillary and incidental relief to which she may be entitled as is warranted by the evidence and circumstances presented.



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Tulsa, Oklahoma 74119
Telephone (918) 712-2686
Fax (918) 712-9222
Attorneys for Respondent

Verification

State of Oklahoma, County of Tulsa, ss:

[REDACTED], of lawful age and being first duly sworn upon oath, states: I [REDACTED], Respondent above named. I have read the foregoing instrument and state that all statements contained therein are true and correct.

[REDACTED]

Subscribed and sworn to before me on March 25, 2015, by [REDACTED], Respondent above named.

My Commission Expires:
TRACY BLAKNEY
Notary Public
State of Oklahoma
Commission # 09007944 Expires 09/18/17

Tracy Blakney
Notary Public

Certificate of Delivery

On March 26, 2015, I mailed, postage prepaid, by First Class U.S. Mail, a true copy of the foregoing instrument to:

Thomas H. Landrum
The Firm on Baltimore
1811 S. Baltimore Ave.
Tulsa, OK 74119

James W. Feamster, III
Adam P. Carroll