



IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

In re the Marriage of

[Redacted]

Petitioner,

Case No.:

[Redacted]

and

DISTRICT COURT
FILED

[Redacted]

[Redacted]

MAR 05 2015

Respondent.

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

APPLICATION FOR TEMPORARY ORDER

COMES NOW, the Petitioner, [Redacted] by and through her attorney of record Thomas H. Landrum, of The Firm on Baltimore, PLLC, and for her Application for Temporary Order she states as follows:

1. **AUTOMATIC TEMPORARY INJUNCTION ORDERS.** The orders contained within the Automatic Temporary Injunction Notice should all remain in full force and effect, to wit: Both parties should continue to be restrained, enjoined and prohibited from:

- A. Molesting or disturbing the peace of the other party or the child of the relationship.
- B. Disrupting or withdrawing the child of this relationship from an educational facility, program, or day-care where the children historically have been enrolled.
- C. Hiding or secreting the children of this relationship from the other party.
- D. The Automatic Temporary Injunction Notice order which prohibited both parties from removing any child of this relationship beyond the jurisdiction of the State of Oklahoma, acting directly or in concert with others,

SALLY HOWE SMITH
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except for vacations of two (2) weeks or less duration, without the prior written consent of the other party, which shall not be unreasonably withheld, should be modified as is hereinafter set forth.

2. **ADDITIONAL TEMPORARY ORDERS REQUESTED.** In addition to the aforesaid Automatic Temporary Injunction Orders, Respondent requests entry of the following temporary orders, to wit:

A. Sole custody of the said minor children should be awarded solely to the Petitioner. A reasonable visitation schedule with the Respondent shall be established for the minor children.

B. Each party should be restrained and prohibited from involving the minor children in disputes between the parties in this litigation. Particularly, each party should be ordered not to speak negatively to, or within the hearing of the minor child about the other party; each party should immediately notify the other of his/her changes of address and telephone numbers; each party should encourage the minor children's contact with the other party; and each party should ensure all reasonable telephone communication between the minor children and the other parent while the minor child are in his/her physical possession. Neither party should ever prevent or interfere with the minor child from contacting the other parent.

C. Instead of the similar order contained in the said Automatic Temporary Injunction Order, each party should be ordered not to remove the minor child from Oklahoma during the pendency of this action without the express written consent of the other party, and, in the event that a children is removed from this state without the express written consent of the other party or an order of this Court, the party so removing or authorizing the removal of a children from this state should

be immediately deprived of all right to the physical possession of the children so removed and the other party should be immediately entitled to the physical possession of the children.

3. Child support for the minor children should be calculated in ordinance with the Oklahoma Child Support Guidelines 43 O.S. §118.

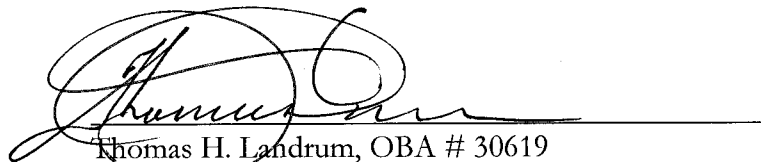
4. Respondent has the ability to pay spousal support and Petitioner has a need therefore arising of the marriage. Petitioner should be awarded temporary spousal support.

5. The Petitioner shall be awarded possession of the marital residence with equitable division of all other shared property.

6. Respondent should be ordered to service any outstanding debts and accruing bills established during the marriage.

WHEREFORE, Petitioner requests that the Court issue its Order Setting Hearing upon said application; that, upon such hearing being conducted, the Court issue the temporary orders above requested; and that Petitioner be granted all further ancillary and proper relief as is warranted by the evidence and circumstances presented.

Respectfully Submitted,



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thomas@lawtulsa.com
Attorney for the Petitioner

VERIFICATION OF DOCUMENTS


STATE OF OKLAHOMA)
) ss.
COUNTY OF TULSA)

I, [REDACTED] of lawful age, being duly sworn on oath, states:

That I am the Applicant herein; that I have read the above and foregoing Document, know the contents thereof, and that the matters and things therein stated are true and correct to the best of my knowledge, information and belief.

[REDACTED]

SUBSCRIBED AND SWORN to before me this 5th day of March, 2015.



Notary Public

