



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

In re the Marriage of:

[Redacted])
)
Petitioner,)
)
and)
)
[Redacted])
)
Respondent.)

CASE NO. [Redacted]
DOCKET [Redacted]
JUDGE _____

DISTRICT COURT
FILED
SEP 24 2015
SALLY HOWE SMITH, COURT CLERK
STATE OF OKLAHOMA, TULSA COUNTY
PH 2:11

APPLICATION FOR TEMPORARY ORDERS

COMES NOW Petitioner, [Redacted], by and through her attorney of record,
Moura A.J. Robertson of MOURA ROBERTSON FAMILY LAW, and for her *Application for
Temporary Orders* [hereinafter "Application"], she alleges and states the following:

1. **PETITION.** Petitioner's verified *Petition for Dissolution of Marriage and Notice of Automatic Temporary Injunction and Automatic Temporary Orders* filed simultaneously herewith.
2. **AUTOMATIC TEMPORARY INJUNCTION (ATI).** The Court should continue the ATI in effect during the pendency of this action and pending further Order of the Court and enforce the Automatic Temporary Order provisions of §110(A)(1)(h).

3. **PROPERTY.** Petitioner seeks a temporary order granting her exclusive possession of certain items of personal property, including household goods and furnishings and the motor vehicle she customarily drives.

4. **EXPENSES, DEBTS AND LIABILITIES.** Petitioner seeks an Order which requires Respondent to continue to timely pay and maintain current all expenses, debt and liabilities of the parties, including but not limited to, life and health insurance premiums, vehicle insurance, real and personal property insurance, mortgage and chattel mortgage payments, ad valorem taxes, all health care expenses, and credit card obligations of the parties and any other expenses, debts and liabilities of the parties.

5. **ADDITIONAL TEMPORARY ORDERS.** Pursuant to O.S. Tit. 43 §110(A)(7), Petitioner seeks Temporary Orders in addition to those provided thereunder; specifically, Respondent should:

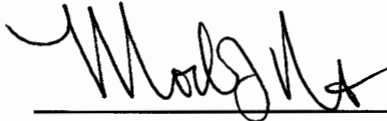
- i. Be restrained from making or causing to be made any changes, and from funding or transferring any assets into or out of any estate planning documents including but not limited to, Wills and Trusts;
- ii. Be restrained from making any changes in ownership or beneficiaries of any life insurance policies and annuities and should further be required to continue to timely pay all premiums necessary to maintain such life insurance policies and annuities;
- iii. Be directed to preserve and protect all assets and investments, including, but not limited to, all business assets and interests;

- iv. Be directed to immediately produce any and all policies of insurance and annuities; and
- v. Be immediately directed to produce all estate planning documents, including Wills and Trusts to Petitioner's undersigned attorneys;

6. **ATTORNEYS FEES.** Petitioner requests this Court enter an order requiring Respondent to pay her temporary attorneys fees, litigation expenses and costs of this action.

WHEREFORE, Petitioner respectfully moves the Court to enter and issue Temporary Orders consistent with the above and foregoing Application together with any and all other relief which she is entitled by law.

Respectfully submitted,



Moura A. J. Robertson, OBA No. 14965

110 West 7th Street, Suite 2610

Tulsa, Oklahoma 74119

Telephone: (918) 382-9332

Fax: (918) 382-9319

ATTORNEY FOR PETITIONER,

██████████

VERIFICATION

STATE OF OKLAHOMA

COUNTY OF TULSA

} ss.

[REDACTED] being first duly sworn, upon oath, deposes and states: that she has read the above and foregoing pleading; and, that she believes the testimony and evidence upon hearing will prove the facts and matters herein set forth are true and correct.

[REDACTED]

SUBSCRIBED and sworn to before me this date, 9/17 2015.

Joni Reed
Notary Public

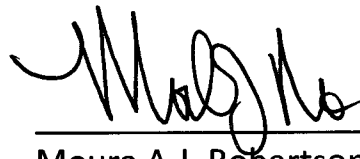
My Commission Expires: 10/17/15
(SEAL)

CERTIFICATE OF SERVICE

I do hereby certify that on September 25, 2015, I caused a true, correct, and exact copy of the above and foregoing instrument to be:

- electronically served
- via fax to:
- e-mail to:
- hand-delivered
- mailed with proper postage thereon
- mailed via certified mail no. **7014287000000389539**
- delivered via third-party commercial carrier

to: Monty Ray Musgrave
c/o James J. Robertson, Esq.
TITUS, HILLIS, REYNOLDS, LOVE, DICKMAN & MCCALMON
3700 First Place Tower
15 East 5th Street
Tulsa, Oklahoma 74103



Moura A.J. Robertson