



3. **Statement of Facts:**

A.	Date of Marriage	July 13, 2015
B.	Date of Separation	August 24, 2015
C.	Petition Filed	August 31, 2015
D.	Grounds	Incompatibility
E.	Counterclaim Filed	October 14, 2015
F.	Notice of Intent to Relocate	February 8, 2016

~~G.~~

4. **Relevant Provisions of Current Order/Decree:**

- A. Per Agreed Temporary Order entered September 14, 2015, Petitioner has temporary sole custody and primary physical custody of the parties' minor child with Respondent having professionally supervised visitation;

5. **Issues to be Litigated:**

A.	Grounds for Divorce	
B.	Custody	x
C.	Visitation	x
D.	Child Support	x
E.	Relocation	x
F.	Property and Debt Division	x

6. **DISCOVERY:**

Complete:  X  YES           NO  
 If not complete, discovery cut-off date is: \_\_\_\_\_

7. **Petitioner's Witnesses:** All objections reserved to the time of trial

	Witness name and address	Substance of testimony
1.	██████████ Petitioner	All Issues

2.	██████████, Respondent	All Issues
3.	Autumn Thorton Angels of Life 8906 East Skelly Drive, Suite C Tulsa, Oklahoma 74129 (539) 302-4501	Supervised Visitation - All Issues
4.	Tonia McNeill Angels of Life 8906 East Skelly Drive, Suite C Tulsa, Oklahoma 74129 (918) 720-3540	Supervised Visitation - All Issues
5.	Mike Heath Heath, Heath and Associates P.O. Box 691453 Tulsa, Oklahoma 74139 (918) 591-2599	Investigation - Observations of Respondent, Respondent's activities and related issues
5.	Tracy Mashburn Heath, Heath and Associates P.O. Box 691453 Tulsa, Oklahoma 74139 (918) 591-2599	Investigation - Observations of Respondent, Respondent's activities and related issues
6.	Kathy McCartney P.O. Box 201 Gui, Alberta T0H-1Y0 (780) 523-7888	Child care, observations of minor child and Petitioner's parenting - All Issues
7.	Daniel Brault 211 61 <sup>st</sup> Street SW Edmonton, Alberta T6X-0E6 (780) 469-6066	Child care, observations of minor child and Petitioner, observations of and communications with Respondent - All Issues
8.	Marta Youngs The Goddard School 14600 East 89 <sup>th</sup> Street North Owasso, Oklahoma 74055 (918) 272-1514	Child care, observations of minor child and Petitioner's parenting - All Issues
9.	Representative DATL 2626 S. Sheridan Tulsa, Oklahoma (918) 664-3285	Drug Testing

10.	Officer P. Newman Owasso Police Department 111 North Main Street Owasso, Oklahoma 74055 (918) 272-2244	Criminal Incident - August 25, 2015
11.	DHS Investigator	DHS Investigation, Findings and Recommendations
12.	Respondent's Witnesses not otherwise objected to	
13.	<del>Any other witnesses identified up until 10 days prior to Trial</del>	
14.	Any necessary rebuttal witnesses	

8. **Petitioner's Exhibits: All objections reserved to the time of trial**

	Description of Exhibit
1.	Owasso Police Department Records
2.	Respondent's DATL Drug Test Reports
3.	Respondent's Email Correspondence
4.	Respondent's Facebook Posts and Instant Messages
5.	US Fleet Tracking Report
6.	Certified Copy of Respondent's Porter County, Indiana Criminal Court Record Case No. 64D01-1406-FD-004913
7.	Certified Copy of Respondent's Tulsa County, Oklahoma Criminal Court Record Case No. CF-2015-4605
8.	Respondent's Discovery Responses
9.	Transcript of Respondent's Deposition
10.	DHS Records and Report
11.	<del>Any other documents identified up until 10 days prior to Trial</del>
12.	Respondent's exhibits not otherwise objected to
13.	Any documents necessary for rebuttal

9. **Respondent's Witnesses:**

	<b>Witness name and address</b>	<b>Substance of testimony</b>
1.	All Petitioner's Witnesses not otherwise objected to	
2.	Julie Kruis 15411 East 450 Road Claremore, Oklahoma 74017 (918) 706-4364	Child care, observations of minor child and Petitioner's and Respondent's parenting, communication with Petitioner and his family
3.	Adam Kruis 15411 East 450 Road Claremore, Oklahoma 74017 (918) 706-4362	Child care, observations of minor child and Petitioner's and Respondent's parenting, communication with Petitioner and his family
4.	Tonia McNeill Angels of Life 8906 East Skelly Drive, Suite C Tulsa, Oklahoma 74129 (918) 720-3540	Supervised visitation
5.	Joe Lawson Angels of Life 8906 East Skelly Drive, Suite C Tulsa, Oklahoma 74129 (918) 927-4093	Supervised visitation
6.	Linda Nicoloff 21355 East Robinway Claremore, Oklahoma 74019 (918) 277-4577	Parenting skills of both parties, communications with Petitioner
7.	David Helm 2050 East 12 <sup>th</sup> Street Tulsa, Oklahoma 74104 (918) 261-0493	Parenting skills of both parties, communications with Petitioner and his family
8.	Autumn Thornton Angels of Life 8906 East Skelly Drive, Suite C Tulsa, Oklahoma 74129 (539) 302-4501	Supervised visitation
9.	Stephanie Brazell 444 South Houston, Suite 301 Tulsa, Oklahoma 74127 (918) 625-8201	Supervised visitation

10.	Any necessary rebuttal witness	
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10. **Respondent's Exhibits:** All objections reserved to the time of trial

	Description of Exhibit
1.	Any Exhibit identified by Petitioner, not otherwise objected to
2.	Text messages
3.	Phone screen shots showing wiretapping and stalking
4.	Voice messages
5.	Reports of Supervised Visitation
6.	Petitioner's Financial Documents
7.	Transcript of Petitioner's Deposition
8.	Respondent's Drug Screening Tests up to the Trial date
9.	Any documents necessary for rebuttal
10.	<del>Any other documents identified up until 10 days prior to Trial</del>

11. *Copies of prescriptions for controlled medications.*  
 11. **Allotted Trial Time: 2 Days**

12. **Stipulations:**

- A. Jurisdiction and Venue
- B. Grounds for Divorce
- C. ~~Parties to exchange final Trial Exhibits by: June 24, 2016 at 5:00 p.m.~~

13. **Have Parties Exchanged Final Written Settlement Offers?**

YES     NO

If not, final written settlement offers to be exchanged by: \_\_\_/\_\_\_/\_\_\_

14. **Mediation Completed:** Yes.

15. **Trial Time/Date:** July 5, 2016 at 9:00 a.m., and July 6, 2016

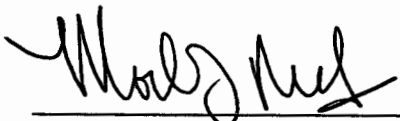
16. ~~Pre-Trial Motions to be filed by:~~ \_\_\_\_\_


17. This Court specifically determines that this Pre-Trial Conference Order is a necessary deviation from the form set forth in Rule 5 of the Rules of the District Courts due to the particular requirements of domestic litigation.

Dated this 15 day of March, 2016.

  
\_\_\_\_\_  
THE HONORABLE JUDGE  
JUDGE OF THE DISTRICT COURT

Approved As to Form:

  
\_\_\_\_\_  
Moura A.J. Robertson, OBA No. 14965  
**MOURA ROBERTSON FAMILY LAW**  
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**ATTORNEY FOR PETITIONER,**  
██████████

  
\_\_\_\_\_  
Kirsten I. Bernhardt, OBA No. 11755  
406 S. Boulder, Suite 411  
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**ATTORNEY FOR RESPONDENT,**  
██████████

Approved:

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Approved:

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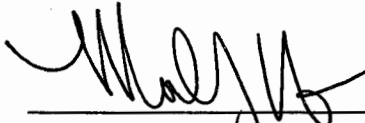
**CERTIFICATE OF SERVICE**

I do hereby certify that on March 15, 2016, I caused a true, correct, and exact copy of the above and foregoing instrument to be:

- electronic service
- faxed
- e-mailed
- hand-delivered
- mailed with proper postage thereon
- mailed via certified mail No.
- third-party commercial carrier

to: Kirsten I. Bernhardt, Esq.  
406 S. Boulder, Suite 411  
Tulsa, Oklahoma 74103  
**ATTORNEY FOR RESPONDENT,**



  
\_\_\_\_\_  
Moura A.J. Robertson