



2. Respondent ADMITS the allegations contained in paragraph two (2) of Petitioner's Application to the extent that the provisions of the Automatic Temporary Injunction (ATI) should continue and OBJECTS to Petitioner's request for additional relief beyond the scope of the ATI as requested in his Application.

3. Respondent is without sufficient information to respond to the request for relief contained in paragraph three (3) of Petitioner's Application and therefore DENIES the allegations and OBJECTS to the request for relief.

4. Respondent DENIES the allegations and OBJECTS to the request for relief contained in paragraph four (4) of Petitioner's Application.

5. Respondent ADMITS the allegations and does not object to the requests for relief contained in Paragraph five (5) of Petitioner's Application.

6. In response to paragraph number six (6), Respondent states:

- a. The relief request is inconsistent with that set forth in paragraph number two (2) of Petitioner's Application;
- b. That the Court should enter a relocation order consistent with Oklahoma law and; and
- c. DENIES and OBJECTS to any other and further relief.

7. Respondent ADMITS the allegations and does not object to the requests for relief contained in Paragraph seven (7) through fifteen (15) of Petitioner's application.

8. Respondent ADMITS to the request for relief contained in paragraph sixteen (16) of Petitioner's Application. However, Respondent DENIES the allegation that Respondent should be financially responsible for the mortgage and utility payments of the marital residence and OBJECTS to the same.

**WHEREFORE**, premises considered, Respondent prays that Petitioner take nothing by way of his Application which is inconsistent with this Response and/or her Counter-Application for Temporary Orders and grant her such other and further relief as this Court deems just and equitable and in the best interests of the parties' minor child.

**II.**

**COUNTER-APPLICATION FOR TEMPORARY ORDER AND RESTRAINING ORDER**

1. Respondent incorporates the provisions of her Response herein above by this reference as if more fully set forth.

2. In addition to the provisions of the Automatic Temporary Injunction (ATI) currently in effect, additional temporary orders are required pursuant to 43

O.S. Sec. 110, *et seq.* to preserve the relative rights of the parties and provide for custody and visitation right in the best interests of the parties' minor children while this action is pending with the Court, specifically:

- a. Each party should be restrained from altering, cancelling, changing beneficiaries or in any other way affecting any insurance policies insuring their lives or the life of their minor child, and Petitioner should be required to pay the premiums; and
- b. Petitioner should be enjoined and restrained from changing the beneficiary of all retirement accounts and required to maintain the same as being Respondent.

3. It is in the best interest of the parties' minor child, [REDACTED] that Respondent to be granted temporary care and custody of the child and Petitioner be granted reasonable and supervised visitation. Respondent therefore requests the same. Moreover, Petitioner should be ordered to enroll in and complete an anger management class before visitation be permitted to be unsupervised.

4. The Court should enter a temporary child support order consistent with the Oklahoma Child Support Guidelines to include provisions for the payment of health care and work-related child care expenses.

5. The Court should enter an order directing the parties to keep the other informed of their current residential addresses and telephone numbers and the person or person(s) with whom they reside.

6. The Court should enter a temporary order directing the parties not to have anyone with whom they are engaged in a romantic or conjugal relationship spend the night with them, meaning after 10:00 p.m. through 8:00 a.m. the following day, while the child is in their physical custody in the child's best interests.

7. Respondent requests an Order that she have temporary, exclusive possession of the marital residence during the pendency of this matter and Order, and that Petitioner pay the mortgage and utilities.

8. Each party should be awarded exclusive possession of the automobile each of them customarily drives, subject to any debt secured thereby, and be required to pay that debt and maintain and insure the same.

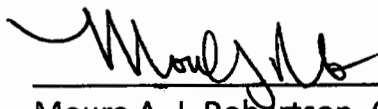
9. Respondent requests an Order that Petitioner pay the minimum monthly payments due on all marital debt and required to hold the Respondent completely harmless from payment of the same.

10. Each party should be awarded his/her personal property, clothing and effects and temporary possession during the pendency of this matter.

11. Petitioner should be ordered to pay Respondent's temporary attorney fees and costs of this litigation.

**WHEREFORE**, premises considered, Respondent prays that the Court, upon hearing this cause, grant her the above and foregoing relief together with such other and further relief as this Court deems just and equitable and in the best interests of the parties' minor child.

Respectfully submitted,



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Moura A. J. Robertson, OB. No. 14965

MOURA ROBERTSON FAMILY LAW

110 W. 7<sup>th</sup> St., Ste. 2610

Tulsa, OK 74119

Telephone (918) 382-9332

ATTORNEY FOR RESPONDENT,

██████

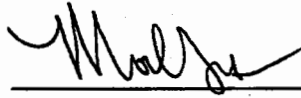
VERIFICATION

STATE OF OKLAHOMA

COUNTY OF TULSA

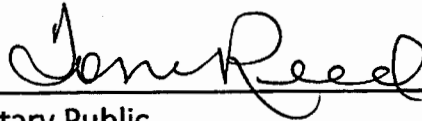
} ss.

**Moura A.J. Robertson**, being first duly sworn, upon oath, deposes and states: that she is the attorney for Respondent; 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.

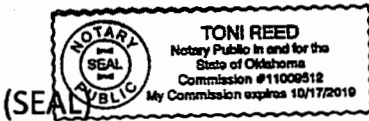


**Moura A.J. Robertson**

SUBSCRIBED and sworn to before me this 4 day of August, 2017.



Notary Public



My Commission Expires: 10/17/19

**CERTIFICATE OF SERVICE**

I do hereby certify that on August 4, 2017, 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.
- delivered via third-party commercial carrier

to: Sara M. Schmook, Esq.  
THE SCHMOOK LAW FIRM  
P.O. Box 701224  
Tulsa, Oklahoma 74170  
ATTORNEY FOR PETITIONER,



**Moura A.J. Robertson**