

1 **COURT OF COMMON PLEAS**

2
3
4
5 _____ COUNTY, _____
6 _____ DIVISION

7
8 **Case No.** _____
9

10
11
12 _____,
13 _____,

14
15 v.
16

17 _____,
18 _____.

19
20 **MOTION FOR CONTEMPT AND FOR ENFORCEMENT OF**
21 **COURT ORDER**
22
23
24

25 Now comes _____, _____ (hereinafter
26 "Movant"), by and through _____, and respectfully moves this
27 Honorable Court for an Order finding _____,
28 _____ (hereinafter "Respondent"), in willful contempt of court for

1 failure to comply with a valid order of this Court. In support of this Motion, Movant
2 respectfully states as follows:
3
4

5 **I. JURISDICTION AND VENUE**

6

7 1. This Court has continuing jurisdiction over the parties and the subject matter of this action
8 pursuant to the prior orders entered in Case No. _____.

9
10 2. Venue is proper in _____ County, _____,
11 as the underlying order was entered by this Court, and the enforcement of said order remains
12 within this Court's authority.
13

14 **II. THE COURT ORDER AT ISSUE**

15

16 3. On _____, this Court, the Honorable _____ presiding,
17 entered a lawful, written order titled " _____ " (hereinafter the "Order").
18

19 4. The Order remains in full force and effect and has not been modified, stayed, or vacated.
20

21 5. Respondent had actual knowledge of the terms of the Order because [describe how the
22 opposing party knew about the order, e.g., Respondent was present at the hearing, signed the
23 consent order, or was personally served with a copy of the Order].
24

25 **III. RESPONDENT'S WILLFUL NONCOMPLIANCE AND VIOLATIONS**

26

27 6. The Order specifically required Respondent to perform the following acts or refrain from the
28

1 following conduct:

2 _____.

3
4 7. Respondent has failed and refused to comply with the terms of the Order. Specifically,
5 Respondent committed the following violations:

6 _____.

7
8 8. Respondent's noncompliance and violation of the Order began on _____ and
9 _____.

10
11 9. Respondent has had, at all times relevant, the physical and financial ability to comply with
12 the terms of the Order but has willfully and intentionally refused to do so. Specifically,
13 Respondent's ability to comply is demonstrated by the following facts:

14 _____.

15
16 10. Movant has made diligent, good-faith efforts to resolve this matter without court
17 intervention, but Respondent has refused to cure the default. Movant's efforts included:

18 _____.

19
20
21 **IV. SPECIFIC REMEDIES AND DAMAGES REQUESTED**

22
23 **11. Financial Arrearages:** As a direct result of Respondent's noncompliance, Respondent
24 currently owes a total outstanding amount of \$_____, calculated
25 through _____. This amount is calculated as follows:

26 _____.

1 **12. Custody and Parenting Time Violations:** To the extent Respondent's violations involve
2 custody or visitation, Respondent denied or missed the following scheduled parenting time or
3 visitation periods:

4 _____.

5 **Movant requests the following make-up parenting time or custody-related remedies:**

6 _____.

7
8 **13. Prior Enforcement History:** Respondent's noncompliance is persistent, as evidenced by
9 the following prior contempt findings, warnings, or enforcement history:

10 _____.

11
12 **14. Other Relief Requested:** Movant further requests that the Court order the following
13 corrective actions or remedies:

14 _____.

15
16 **15. Attorney's Fees and Costs:** Movant has been forced to retain counsel to enforce the Order
17 and has incurred reasonable attorney's fees and court costs. Movant requests an award of
18 attorney's fees and costs in the amount of \$_____ based on the
19 following grounds:

20 _____.

21
22
23 **V. REQUEST FOR EXPEDITED HEARING**

24
25 **16.** Movant respectfully requests that this matter be set for an expedited or emergency hearing
26 because:

27 _____.

17. Movant intends to present the following supporting evidence at the hearing:

_____.

18. Movant intends to call the following witness to support the allegations of contempt:

_____, who is expected to testify regarding:

_____.

PRAYER FOR RELIEF

WHEREFORE, Movant respectfully requests that this Court enter an Order:

a. Finding Respondent in willful contempt of this Court's Order dated _____;

b. Ordering Respondent to immediately cure the contemptuous conduct;

c. Awarding Movant judgment for all outstanding financial arrearages in the amount of
\$_____, plus interest;

d. Ordering make-up parenting time or custody remedies as requested herein;

e. Ordering Respondent to pay Movant's reasonable attorney's fees and costs incurred in
bringing this action;

f. Imposing appropriate coercive sanctions, fines, or other corrective actions to compel
compliance; and

g. Granting such other and further relief as this Court deems just, equitable, and proper.

Dated: _____

Respectfully submitted,

1 **Signature:** _____

2 **Printed Name:** _____

3 **Bar No.:** _____

4 **Firm Name:** _____

5 **Street Address:** _____

6 **Unit Number (if applicable):** _____

7 **City:** _____

8 **State:** _____

9 **Zip Code:** _____

10 **Phone:** _____

11 **Email:** _____

12 Attorney for Movant

13
14 *

15
16 **NOTICE OF HEARING**

17
18 **TO:** _____

19 _____

20
21 **PLEASE TAKE NOTICE** that the foregoing Motion for Contempt and for Enforcement
22 of Court Order is scheduled for a hearing before the Honorable

23 _____ on _____ at _____, to be held at

24 _____. Your failure to appear may result in the Court granting the
25 relief requested in this Motion without further notice to you.

26
27 **Dated:** _____

28 **Signature:**

1 _____

2 **Printed Name:** _____

3 **Attorney for Movant**

4
5 *

6
7
8 **CERTIFICATE OF SERVICE**

9
10 I hereby certify that on _____, a true and correct copy of the foregoing Motion for
11 Contempt, Notice of Hearing, and all supporting documents was served upon
12 _____ via [how the Motion for Contempt will be served, e.g., personal
13 service, certified mail, or other specified service method: _____].

14
15 **Signature:** _____

16 **Printed Name:** _____

17 **Attorney for Movant**