

IN THE \_\_\_\_\_ COURT OF \_\_\_\_\_ COUNTY,

\_\_\_\_\_

\_\_\_\_\_ DIVISION

\_\_\_\_\_,

Petitioner,

v.

Case No. \_\_\_\_\_

\_\_\_\_\_,

Respondent.

\_\_\_\_\_/

## MOTION FOR TEMPORARY ORDERS

COMES NOW, Petitioner, \_\_\_\_\_, by and through undersigned counsel, and respectfully moves this Honorable Court for the entry of Temporary Orders pursuant to \_\_\_\_\_, and in support thereof states as follows:

### I. PROCEDURAL POSTURE

1. This matter is currently pending before the Court, involving the dissolution of marriage between Petitioner and Respondent, or other domestic relations issues requiring judicial intervention.
2. The parties are currently engaged in litigation concerning, among other things, child custody, child support, spousal support, and the division of marital assets and debts.
3. Petitioner files this Motion to establish interim arrangements for the parties and any minor

children during the pendency of this action, to ensure stability, prevent irreparable harm, and maintain the status quo.

## **II. JURISDICTION AND VENUE**

4. This Court has subject matter jurisdiction over this action pursuant to \_\_\_\_\_.

5. Venue is proper in this Court and County pursuant to \_\_\_\_\_.

## **III. FACTUAL BACKGROUND**

6. The parties were married on \_\_\_\_\_, and separated on or about \_\_\_\_\_.

7. During the marriage, the parties had \_\_\_\_\_ minor child(ren), whose names and dates of birth are:

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8. Since the separation, the parties have been unable to agree upon consistent arrangements regarding the care and custody of the minor child(ren), financial support, or the management of marital assets and debts.

9. The current lack of formal orders has created uncertainty and instability for the parties and the minor child(ren), necessitating immediate judicial intervention.

## **IV. GROUNDS FOR TEMPORARY ORDERS**

10. Temporary Orders are necessary and appropriate in this case to:

- a. Establish a temporary parenting plan, including custody and visitation schedules, that

serves the best interests of the minor child(ren).

b. Provide for the temporary financial support of the minor child(ren) through an appropriate child support order.

c. Address the temporary financial needs of a party through an appropriate spousal support order.

d. Determine the temporary use and possession of the marital residence and other significant marital property.

e. Allocate responsibility for the payment of marital debts and expenses during the pendency of this action.

f. Prevent the dissipation of marital assets or the incurrence of unreasonable debts by either party.

g. Ensure the continued provision of health insurance and other necessary services for the minor child(ren) and/or a party.

11. Without the entry of Temporary Orders, the parties and the minor child(ren) will continue to experience undue hardship, conflict, and uncertainty, which is detrimental to their well-being.

## **V. RELIEF REQUESTED**

**WHEREFORE, Petitioner respectfully requests that this Honorable Court enter Temporary Orders, pending final judgment in this matter, providing for the following:**

**a. Temporary Child Custody and Visitation:** An order establishing a temporary parenting plan, including legal and physical custody arrangements and a visitation schedule for the minor child(ren), consistent with their best interests.

**b. Temporary Child Support:** An order requiring Respondent to pay temporary child support to Petitioner, or vice versa, in an amount consistent with applicable guidelines and the needs of the minor child(ren).

**c. Temporary Spousal Support:** An order requiring Respondent to pay temporary spousal support to Petitioner, or vice versa, in an amount necessary to maintain the status quo and meet reasonable living expenses.

**d. Temporary Use and Possession of Property:** An order granting Petitioner temporary exclusive use and possession of the marital residence located at \_\_\_\_\_, and/or other specific marital property.

**e. Temporary Allocation of Debts and Expenses:** An order allocating responsibility for the

payment of marital debts, household expenses, and other financial obligations during the pendency of this action.

f. **Restraining Orders:** An order restraining both parties from dissipating marital assets, incurring unreasonable debts, or harassing, annoying, or molesting the other party or the minor child(ren).

g. **Other Relief:** Any other temporary relief as this Court deems just and proper under the circumstances.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Respectfully submitted,

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**Signature**

**Printed Name:** \_\_\_\_\_

**Bar No.:** \_\_\_\_\_

**Attorney for Petitioner Address:**

\_\_\_\_\_

\_\_\_\_\_

**Phone:** \_\_\_\_\_

**Email:** \_\_\_\_\_

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing MOTION FOR TEMPORARY ORDERS was served upon the following party(ies) by the method(s) indicated

below on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_ :

**Respondent / Attorney for Respondent: Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Service Method:**  U.S. Mail, postage prepaid

Hand Delivery

Facsimile

Email

Other: \_\_\_\_\_

Signature of Petitioner or Attorney for Petitioner