

**NOTICE: THIS DOCUMENT  
CONTAINS SENSITIVE DATA**

233-765358-25

Cause No. \_\_\_\_\_

*IN THE INTEREST OF M.E.M.  
AND C.R.M., TWO MINOR  
CHILDREN*

§ In the (*check one*):  
§  322nd District Court  
§  County Court at Law No. \_\_\_\_\_  
§ \_\_\_\_\_ TARRANT County, Texas

**Motion for EMERGENCY TEMPORARY INJUNCTIVE RELIEF**

*Print your answers*

My name is:

CHARLES DUSTIN MYERS

*First*

*Middle*

*Last*

I am the  Petitioner  Respondent in this case and request the Court grant this motion for EMERGENCY TEMPORARY INJUNCTIVE RELIEF. In support, the following is shown:

**SEE ATTACHED PETITION**

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Respectfully submitted,

► /s/ Charles Dustin Myers 03/17/2025  
*Your Signature* *Date*

CHARLES DUSTIN MYERS 817-546-3693  
*Your Printed Name* *Phone*

6641 ANNE COURT, WATAUGA, TX 76148  
*Mailing Address* *City* *State* *Zip*

CHUCKDUSTIN12@GMAIL.COM  
*Email Address* *Fax # (if any)*

### **Notice of Hearing**

The above motion is set for hearing on \_\_\_\_\_ at \_\_\_\_\_.M. in

\_\_\_\_\_ *(designation and location of court).*

SIGNED on \_\_\_\_\_.

\_\_\_\_\_  
Judge or Clerk

NO. \_\_\_\_\_  
IN THE 322<sup>ND</sup> DISTRICT COURT OF TARRANT COUNTY,  
TEXAS

**CHARLES DUSTIN MYERS,**

*petitioner and next friend of M.E.M  
and C.R.M., two minor children*

vs.

**MORGAN MICHELLE MYERS,  
respondent**

PETITIONER'S ORIGINAL  
PETITION AND APPLICATION  
FOR EMERGENCY INJUNCTIVE  
RELIEF

**I. PARTIES AND JURISDICTION**

**A. Petitioner and Next Friend**

1. Charles Dustin Myers (“Petitioner”) is the father of two minor children, M.E.M., aged eight, C.R.M., aged five, (“the Children”). The Children are under 18 and have no court-appointed guardian in this matter. Petitioner brings this suit **as Next Friend** of the Children pursuant to Texas Rule of Civil Procedure 44, which permits minors without a legal guardian to sue through a next friend. Petitioner also brings claims **in his individual capacity** as the Children’s biological father.

2. Petitioner notes that related cause number 322-744263-23, a suit for the dissolution of marriage, is procedurally stalled with the Respondent named in the instant case, Morgan Michelle Myers, being unable to prosecute her case. The current orders in the related divorce matter, reflect facially void orders that claim all parties agree, yet they

were rendered without the consent of both parties on March 14, 2024. Thus, the orders have no legal effect, and the children have no legally effectuated managing conservator despite being under the court's continuous jurisdiction. Therefore, Petitioner's initiation of this suit on behalf of the minor children, M.E.M and C.R.M. as Next Friend to restore their status quo is appropriate and aligns with their best interests, Texas State policy, and the Texas Family Code.

### **B. Respondent Morgan Michelle Myers**

3. Respondent Morgan Michelle Myers ("Morgan" or "Defendant") is an individual residing in Tarrant County, Texas. She is the mother of the Children and Petitioner's spouse. Morgan may be served with process at 6641 Anne Court, Watauga, Texas 76148, which is the matrimonial home.

### **C. Third Party Defendant Dan Branhoover**

4. Defendant Dan Branhoover is an individual who resides in Yukon, Oklahoma. Branhoover is a relative of Morgan who, as detailed below, assisted her in the wrongful acts against Petitioner and the Children. Once liability is established, Branhoover is subject to personal jurisdiction in Texas under the Texas long-arm statute because he **committed tortious acts in whole or in part in Texas** that give rise to this suit. Specifically, Branhoover actively **aided Morgan's fraudulent court filings and interference with the Petitioner's parental rights** in Texas, causing injury in Texas, and thus "committed a tort in whole or in part in this state" per Tex. Civ. Prac. & Rem. Code § 17.042(2). He may be served pursuant to Tex. Civ. Prac. & Rem. Code § 17.044 by serving the Texas Secretary of State, or by any other method authorized by law, as his

acts constitute doing business in Texas. Petitioner will move to include Branthoover as a party to this matter when procedurally appropriate.

#### **D. Jurisdiction**

5. This Court has subject-matter jurisdiction over this cause. The amount in controversy exceeds the minimum jurisdictional limits of this Court. More importantly, the Court has jurisdiction under **Texas Family Code § 42.002**, which **expressly authorizes a civil action** for interference with possessory interests in a child. The Court also has jurisdiction to grant injunctive relief to protect the best interests of the Children, as this suit directly impacts the parent-child relationship. Petitioner further invokes this Court's equitable power to remedy fraud on the court and to protect the welfare of minor children.

#### **E. Venue**

6. Venue is proper in Tarrant County, Texas. The Children reside in Tarrant County, and Defendant Morgan resides in Tarrant County. Many of the wrongful acts occurred in Tarrant County (including fraudulent filings in the 322nd District Court of Tarrant County). Here, a related Suit Affecting the Parent-Child Relationship (the divorce and custody proceeding) is pending in Tarrant County (Cause No. 322-744263-23 in the 322nd Judicial District). Filing in this venue serves the interests of justice and efficiency.

#### **F. Standing and Capacity**

7. Petitioner, as the Children's biological father and Next Friend, is **authorized to bring claims on their behalf**. He has a justiciable interest in the custody and well-being of the Children. The Children have standing through Petitioner to seek relief for the

harms they have suffered due to Respondent's conduct. Petitioner also has standing on behalf of his children and in his own right to seek redress for the violation of his parental rights and the personal damage he sustained leading to emotional conflict for the children and himself.

## **II. FACTUAL BACKGROUND**

*Morgan Michelle Myers, Respondent and Danielle Kenneth Branhoover, Defendant, are collectively referred to as "Defendants".*

### **G. Summary of the Dispute**

8. This case arises from an unprecedented and unjust separation of a father from his children through **fraud and deception upon the courts**. On January 16, 2024, the 322nd District Court of Tarrant County signed an order that **ousted Petitioner from his own home and effectively removed him from the Children's lives**. To this day, that drastic removal remains **unexplained and unjustified**, as it was procured by Defendant Morgan's false filings and has never been meaningfully examined. Petitioner was given no real opportunity to be heard before losing daily contact with his Children. Over a year has passed, yet no court has rectified or even addressed the **glaring fraud and inconsistencies** underlying the orders that separated a loving father from his kids without cause.

### **H. Texas Policy Favors Both Parents' Involvement**

9. From the outset, it must be emphasized that Texas public policy "**assure[s] that children will have frequent and continuing contact with parents who have shown the ability to act in the best interest of the child.**" (Tex. Fam. Code § 153.001(a)(1)). The

law further provides that “**the best interest of the child shall always be the primary consideration**” in matters of possession and access (Tex. Fam. Code § 153.002).

Petitioner has always acted in the Children’s best interests, as evidenced by his role as their primary caregiver and provider prior to court intervention. Yet Defendants’ actions have flipped Texas policy on its head – rather than frequent contact with both parents, the Children have been limited to one parent’s custody for over a year, with **the other parent (Petitioner) effectively erased from their daily lives**. This lawsuit seeks to restore the **status quo ante** in line with Texas law and the Children’s best interests.

### **I. Background – The Marriage and Children**

10. Petitioner and Respondent Morgan were married for eight years and are the parents of two minor Children (ages 6 and 8). Prior to the events in question, Petitioner was a devoted father and the **primary caregiver** to the Children. He was also the family’s primary breadwinner, ensuring financial stability for the household. The family lived together at their home in Watauga, Texas. The Children enjoyed a loving relationship with Petitioner, who was deeply involved in their daily routine, care, and upbringing. There had been no history of family violence or court intervention during the full scope of the marriage.

### **J. Morgan’s Sudden Change of Heart and Secret Preparations**

11. In early December 2023, without warning, Morgan informed Petitioner that she wanted a divorce. Her initial stated reasons were trivial (complaints about how Petitioner talked to her), but soon she began condemning the entire marriage, even memories she once cherished. Unbeknownst to Petitioner at the time, Morgan was

already engaged in **extramarital relationships** with at least two individuals outside the marriage: **Debbie Price** and **Damen Kazlauskas**. On or around December 12, 2023, Petitioner discovered phone records showing an enormous volume of communication (over 16,500 text messages) between Morgan and these individuals. Confronted with the likely exposure of her infidelity and concerned about its implications, Morgan began **frantically plotting to remove Petitioner from the picture**. Her goal, as evidenced by her actions, was to **lock Petitioner out of the marital home, isolate him from the Children, and shield her own wrongdoing from scrutiny**.

#### **K. Fraudulent and Ex Parte Court Filings (December 2023)**

12. Between December 14 and December 22, 2023, Morgan – with active help from Defendant Branthoover – made a series of **rushed court filings** in the 322nd District Court designed to obtain an upper hand through deceit. These filings were calculated to portray Petitioner as an absent or dangerous spouse and to **deprive him of notice or a chance to defend himself**. In rapid succession, Morgan filed:

- **a. False “Uncontested Case” Representation:** On or about December 18, 2023, Morgan submitted a document (for review by a court attorney) falsely indicating that the case was “uncontested,” implying Petitioner had agreed or would not fight. *[Exhibit 1](#)*

13. Petitioner had not even been served or informed, and there was **no agreement** – this was a ploy to mislead the court into quicker relief.

- **b. Affidavit of Inability to Pay Court Costs (Pauper’s Oath):** On December 18, 2023, Morgan filed an affidavit claiming she was indigent and unable to afford the

~\$400 filing fee for the divorce, asserting that she had only \$20 to her name and that the Children “relied solely on her income”. ***Exhibit 2***

14. This statement was a **knowing falsehood**. In truth, Petitioner was the primary financial provider for the family, and Morgan had access to substantial funds. In fact, just days before, on December 16, 2023, Morgan (with Branthoover’s guidance) **transferred \$1,576.00 in joint marital funds into a new personal bank account under her control** using Branthoover’s PayPal as a method to obscure her banking information. Morgan admitted in text messages with Branthoover that she moved these funds, and bank records later confirmed it. Thus, at the time she swore she was penniless, she was in possession of significant community assets. She also grossly misrepresented her expenses in that affidavit – claiming she alone paid the mortgage/rent and car loans – when in fact **Petitioner had been paying those bills** and continued to pay them. (Notably, one of the vehicles Petitioner was paying for has been repossessed by the dealer due to financial hardship.) These **glaring contradictions** in Morgan’s pauper’s affidavit demonstrate perjury and fraud upon the court. ***Exhibit 3.***

*Morgan’s divorce case should never have even been docketed without fees, given her deceit.*

- **c. Original Petition for Divorce with Inconsistent Allegations:** Also on December 18, 2023, Morgan filed an Original Petition for Divorce. In it, she made convoluted and **contradictory statements regarding a protective order**. She alleged that she had applied for a protective order on December 14 that was “undecided,” yet simultaneously claimed an “active” protective order finding

family violence was in place (apparently to invoke a 60-day waiting period waiver for divorce). ***Exhibit 4***

15. Both cannot be true; this inconsistency should have been a red flag. Furthermore, if an active protective order truly existed, Texas law (Tex. Fam. Code § 6.405(b)) **required Morgan to attach a copy of it to her petition.** She attached no such order, because none existed – the “active” protective order was a **fiction.** In short, Morgan was telling the court whatever was convenient at the moment, truth be damned.

- **d. Application for Protective Order (Second Attempt):** On December 22, 2023, Morgan filed yet another request – an Application for a Protective Order – in the 322nd District Court. ***Exhibit 5***

16. This was perplexing, since just four days earlier she had implied she already had a protective order. The second application underscores that Morgan was **“bent on amassing multiple orders”** against Petitioner without justification. The Application was based on allegations of “family violence” by Petitioner, but **no credible evidence** was ever presented to support such claims. On the very day this second application was filed (Dec. 22), Morgan and Petitioner were photographed **laughing and playing with the Children together in the family home** – hardly the behavior of someone in imminent fear for her safety. Morgan’s own contemporaneous text messages and photos show a normal, even happy, family scene that day. This directly **contradicts her sworn claims** that she needed protection from Petitioner. ***Exhibit 5.1***

#### **L. Branthroover’s Involvement**

17. Defendant Branthoover (Morgan’s relative) played a pivotal role in this scheme. Immediately after Morgan’s first filing on Dec. 14, she traveled to Yukon, Oklahoma – Branthoover’s location – where he “**assisted her in preparing subsequent filings designed to achieve the very result we see today—Respondent’s abrupt removal from his home.**”. Branthoover’s assistance is confirmed by his own admissions via text and is the basis of a pending lawsuit against him in Oklahoma for his role in this fraud. *[Exhibit 6](#)* In essence, Branthoover acted as a co-conspirator, helping Morgan craft and present false evidence to Texas courts. He had **actual knowledge** of Morgan’s plans and the falsehoods in her filings, yet actively furthered them. Under Texas law, one who **aids or assists** in the interference with another’s possessory rights in a child is **jointly liable** for the damages caused (Tex. Fam. Code § 42.003). Branthoover’s liability in this action flows from his knowing aid in Morgan’s tortious conduct.

#### **M. “Agreed” Temporary Orders**

18. Making matters worse, Morgan’s counsel allegedly retained on the spot drafted “**Temporary Orders**” following the January 22 reset in related case 322-744263-23, which purported to memorialize an agreement or hearing that never truly occurred and is not found within the docket sheet. These Temporary Orders claim that all parties “agreed” to the terms – yet **Petitioner never agreed** to any such orders, and his signature is absent from such. The court cannot legally enforce temporary orders that claim to be agreed when consent is absent at the time of rendition. Such is the case here, and they should be immediately vacated. *[Exhibit 7](#)*

19. **No proper hearing was ever held, no evidence was taken, and Petitioner never signed or approved those orders.** Indeed, the only signature on the Temporary

Orders is Morgan’s and her counsel’s; Petitioner’s signature is absent. The orders also reference a motion that **was never served** on Petitioner. This is clear procedural irregularity. These “agreed” Temporary Orders, entered on false pretenses, gave Morgan temporary custody of the Children and possession of the home, while barring Petitioner from both. By any measure, such orders – obtained without notice, without a genuine hearing, and predicated on false statements of agreement – **lack validity**. They are *void ab initio* and cannot stand as a barrier to the relief Petitioner seeks here. Morgan’s misuse of the court’s processes to rubber-stamp an unjust arrangement is part and parcel of her tortious conduct.

#### **N. Morgan’s Abdication of the Truth and Procedure**

20. After securing the Temporary Orders, Morgan and her attorney effectively went dark and **stonewalled the litigation**. They **refused to participate in discovery**, ignored deposition notices, and generally failed to prosecute the divorce on the merits. Tellingly, neither Morgan nor her counsel has ever filed any substantive response to Petitioner’s numerous sworn allegations of fraud in the pending case. They offered **no rebuttal** to the detailed factual record Petitioner built demonstrating Morgan’s deceit. Morgan’s silence in the face of these accusations is deafening – she could not defend the indefensible. Instead, her counsel’s rare court appearances were limited to raising baseless objections aimed at **preventing Petitioner from cross-examining Morgan** or exposing the truth. This strategy of “obfuscation and evasion” underscores that Morgan has **no legitimate defense** for her actions; her plan was simply to **run out the clock** while Petitioner remained in forced exile from his Children.

#### **O. Harm to Petitioner and the Children**

21. The impact of Defendants' actions has been devastating and continues to worsen. Petitioner **lost his family, his home, and even his livelihood** as a direct result of the fraudulent orders. Being evicted from his home without notice not only separated him from the Children, but also disrupted his business/employment, causing severe financial strain. The family's previously stable finances have been thrown into chaos. Petitioner has incurred substantial expenses fighting these false accusations and attempting to reunite with his Children. He has suffered extreme emotional distress, detailed further below, from the traumatic loss of his role as father and daily caregiver.

22. The **Children** have likewise suffered immensely. They went from having a loving father present each day to suddenly **no contact at all**, effectively overnight. This abrupt, unexplained loss of a parent's daily presence has caused the Children profound confusion, anxiety, and emotional pain. They were too young to understand why their father vanished from their lives. Family members (including Morgan's own relatives) have struggled to explain the situation to the Children, because the truth – that it was all based on lies – was concealed. Instead, the Children have been left with the impression that their father "went away" or did something wrong, which is untrue and damaging to their mental well-being. The Children have essentially been **deprived of a parent's love, guidance, and support for over a year** through no fault of their own. Moreover, during this period, Morgan has **introduced a new man (Defendant Kazlauskas) into the Children's lives**, spending substantial time with him and even allowing him to take the Children places alone. The Children now see this **stranger more often than their own father**.

23. This is exactly the kind of harmful disruption in a child's life that Texas law seeks to prevent. **Texas law prioritizes frequent, meaningful contact between children and both parents**, yet the Children's reality is the opposite. As the Texas Supreme Court has recognized, children depend on "the positive benefits flowing from parental love, affection, protection, emotional support, services, companionship, care, and society" from both parents. Defendants have callously stripped the Children of these benefits from Petitioner.

24. In sum, **Morgan's fraudulent actions, aided by Branthoover, have caused unprecedented and ongoing harm**. Petitioner was **the primary caregiver** and a fit, loving parent. There was no legitimate reason to remove him. Yet due to Defendants' tortious conduct, **the Children have effectively lost a parent for over a year**, and Petitioner has lost irreplaceable time with his kids. This is a human tragedy as much as a legal wrong. The facts are largely undisputed – Morgan has **never rebutted the evidence of her lies** – and the need for relief is urgent. Every day that passes is another day of childhood the Children can never get back with their father.

25. That being said – Petitioner wishes no ill will toward any Defendant or participant in this suit – he simply wants what's right by his children in alignment with Texas law.

### **III. CAUSES OF ACTION**

**Count 1: Tortious Interference with Parental Rights (Interference with Possessory Interest in a Child)**

**26. Interference with Possessory Rights:** Petitioner incorporates the facts above. Texas law expressly forbids one parent (or any person) from wrongfully depriving another parent of his court-ordered possessory rights with respect to a child. Under Texas Family Code § 42.002, “**a person who takes or retains possession of a child or who conceals the whereabouts of a child in violation of a possessory right of another person may be liable for damages to that person.**”

27. A “possessory right” defined in the Family Code includes a court-ordered right of possession or access, as well as a parent’s natural and statutory rights absent a valid court order to the contrary. Here, Petitioner had possessory rights to his Children both as a matter of law (being their father with equal rights during the marriage) and under any prior court understanding. **Defendants intentionally interfered with and violated Petitioner’s possessory rights** by orchestrating and enforcing a situation in which Petitioner has been excluded from the Children’s lives.

**28. Morgan’s Direct Interference:** Morgan took and retained sole possession of the Children at a time when Petitioner was **entitled to joint possession and access on March 6<sup>th</sup>, 2024**, Morgan acted **without lawful excuse** in keeping the Children away from Petitioner by locking him out of his own house. She violated the fundamental possessory right of Petitioner to have access to his Children. Each day that she refused to produce the Children to Petitioner, she was in **ongoing violation of Petitioner’s rights**. Notably, Texas law makes it a **crime** to knowingly violate a custody order or to keep children away from a legal custodian (Tex. Penal Code § 25.03), underscoring the public policy against such interference. Morgan’s conduct here is even more egregious because she herself engineered the void order on which she then relied.

**29. Branthoover's Aiding and Abetting:** Pursuant to Texas Family Code § 42.003, “**a person who aids or assists in conduct for which a cause of action is authorized by this chapter is jointly and severally liable**”

Branthroover aided and assisted Morgan’s interference with Petitioner’s possessory rights at every step. He helped draft the false pleadings that led to Petitioner’s removal. He had **actual notice** that Petitioner had rights to possession of the Children and knew that the intended result of the filings was to cut off those rights. Thus, Branthoover is jointly liable for the tortious interference with Petitioner’s parental rights and custody.

**30. Elements and Malice:** Defendants’ conduct was **willful and intentional**. Morgan’s objective from the moment she realized her infidelity might be exposed was to **willfully deprive Petitioner of possession of the Children** to protect herself. She pursued multiple legal actions not to address any real danger or harm, but as “strategic maneuvers to lock in ‘temporary’ orders” ensuring Petitioner’s removal Such acts were inherently malicious and without justification. Petitioner was entitled to be with his Children – instead, Defendants’ actions **wrongfully divested him of that entitlement**.

**31. Damages (Count 1):** As a direct result of this tortious interference, Petitioner has suffered damages in an amount within the jurisdictional limits of the Court. His damages include, but are not limited to: loss of business income for being **unable to conduct his normal course of business for the last year, loss of the value of the parent-child relationship** during the period of interference; **mental anguish and emotional suffering** caused by being separated from his Children; expenses incurred in

attempting to locate, contact, and regain possession of the Children and residence which he depends on for work (including legal fees and investigative costs); and other economic losses such as lost business opportunities and housing costs stemming from his ouster.

Texas Family Code § 42.006 specifically allows recovery of **mental suffering and anguish** for violation of possessory rights, all of which Petitioner has experienced. These losses are ongoing and increasing as the interference continues.

32. Furthermore, Defendants acted with **malice** and **intent to harm** Petitioner, warranting the imposition of **exemplary (punitive) damages** under Tex. Fam. Code § 42.006(b) and Chapter 41 of the Civil Practice & Remedies Code. Defendants' conduct was outrageous, deliberate, and undertaken with conscious disregard for Petitioner's parental rights and the Children's wellbeing. Petitioner seeks **exemplary damages** to punish and deter such egregious misconduct.

### **Count 2: Intentional Infliction of Emotional Distress**

33. Petitioner incorporates all prior paragraphs. Independently of (or in addition to) the above, Defendants have committed the tort of **Intentional Infliction of Emotional Distress (“IIED”)** against Petitioner. Under Texas law, IIED occurs when: **(1)** the defendant acted intentionally or recklessly, **(2)** the conduct was extreme and outrageous, **(3)** the actions caused the Petitioner emotional distress, and **(4)** the emotional distress was severe. All elements are met here.

34. **Extreme and Outrageous Conduct:** Defendants' conduct – fraudulently fabricating allegations to strip a loving father of his children, and perpetuating that lie for over a year – is **extreme and outrageous in the extreme**. It “goes beyond all possible

**bounds of decency”** and is utterly intolerable in a civilized community. Texas courts have recognized that behavior calculated to destroy the bond between parent and child can be outrageous. Morgan **lied under oath repeatedly** (alleging nonexistent abuse, poverty, etc.), **exploited the trust of the court**, and effectively **kidnapped the Children under color of law**. She did so with malice aforethought, aiming to cause Petitioner the maximum emotional pain – the loss of his children – as punishment for uncovering her affair. Branthoover, in turn, facilitated this scheme with knowing disregard of the harm it would inflict. It is hard to conceive of a more cruel and emotionally abusive act than to **falsely portray a parent as dangerous and remove his children from him without cause**. Defendants’ conduct offends basic societal standards of decency and has been **described as a “travesty” and “alarming” even within the context of the court record.**

**35. Intent or Recklessness:** Morgan’s intent to cause emotional harm to Petitioner (or at least reckless disregard thereof) is evident. By her own words and actions, her priority was to *silence and punish* Petitioner. When Petitioner confronted her with evidence of her infidelity, she did not respond by addressing the issue honestly or seeking a fair separation – instead, she embarked on a campaign to “**ensure Respondent’s removal**” at all costs.

36. She knew that separating Petitioner from the Children would devastate him – indeed, she weaponized the Children as pawns to hurt Petitioner. Even if her primary motive was self-interest, she certainly **knew with substantial certainty** that Petitioner would suffer extreme distress if he lost his Children due to false accusations and suffer financial losses. Thus, she acted with at least reckless disregard for the near certainty of

severe emotional harm to Petitioner. Branthoover likewise knew that helping Morgan perpetrate this fraud would cause Petitioner great anguish; any reasonable person would recognize that outcome as the obvious consequence of these actions. Proceeding in the face of that knowledge is the epitome of recklessness.

**37. Severe Emotional Distress:** As a direct result of Defendants' outrageous actions, Petitioner has suffered **severe emotional distress**. The distress is ongoing and has manifested in depression, anxiety, humiliation, and despair. Petitioner has experienced sleeplessness, loss of appetite, and a profound sense of injustice and grief. He has been **deprived of the joys of watching his children grow** – their birthdays, holidays, and everyday moments have been lost to him, causing an emotional void that cannot be quantified. The **trauma of being falsely painted as a danger and seeing his children turned against him** has caused Petitioner mental pain far beyond what any person should bear. This distress has **substantially disrupted** Petitioner's daily life and ability to function. He has required counseling/therapy to cope, and even that is insufficient to fully address the harm. The severity of Petitioner's emotional suffering meets and exceeds the standard required under Texas law (which demands a high degree of mental pain and distress that is more than mere worry, anxiety, or anger). Here, Petitioner's entire familial world was unraveled maliciously – a truly catastrophic emotional injury.

**38. No Alternative Remedy:** Petitioner acknowledges that IIED is a “gap-filler” tort under Texas law, meant to supplement other causes of action when the conduct causing the emotional distress is not adequately addressed by other tort claims. To the extent any of Defendants' conduct might be deemed outside the scope of the interference

tort or other claims, Petitioner pleads IIED in the alternative. The emotional devastation inflicted on Petitioner stems not only from the interference with custody (Count 1) but also from the **cumulative effect of the lies, betrayal, and abuse of process**. Should the court find that any aspect of Defendants' conduct (for example, the defamatory implications of false abuse allegations, or the misuse of legal process) is not fully remedied by another tort, IIED should apply to ensure Petitioner is made whole. In any event, Defendants' conduct is so egregious that public policy would allow an IIED claim to proceed.

**39. Damages (Count 2):** For this Intentional Infliction of Emotional Distress, Petitioner seeks to recover all damages allowable by law. This includes **compensation for past and future mental anguish**, emotional pain and suffering, loss of enjoyment of life, and any physical symptoms or illness resulting from the severe stress. No cap on damages applies to intentional torts of this nature, and Petitioner will ask the trier of fact to award a sum that reflects the enormity of the harm (in an amount far in excess of the minimum jurisdictional limits). Petitioner also seeks **punitive damages** on the IIED claim, as Defendants acted willfully, maliciously, and with conscious disregard of Petitioner's rights. The Court should send a strong message that such outrageous abuse of a parent and the court system will not be tolerated.

**Count 3: Deprivation of Support and Parental Consortium (On Behalf of the Children)**

40. Petitioner incorporates the preceding paragraphs. This Count is brought **on behalf of the minor Children, through Petitioner as next friend**, to recover for the distinct injuries the Children themselves have suffered due to Defendants' wrongful

conduct. Texas law recognizes that children have a right to the “**positive benefits flowing from parental love, affection, protection, emotional support, services, companionship, care, and society**” of their parents.

Depriving a child of a parent’s support and companionship is a grave injury to the child. Here, Defendants’ actions intentionally deprived the Children of the **support, nurture, and companionship of their father**, Petitioner. This includes both **emotional support (parental consortium) and financial support** that Petitioner would have provided.

**41. Intentional Deprivation:** Morgan knew that by removing Petitioner from the home and blocking all contact, she was also **depriving the Children of their father’s presence and support**. She proceeded in spite of that, placing her own interests above the Children’s emotional needs. Such conduct evidences a “**profound disregard for her children’s needs**.” Indeed, Morgan was so consumed with maintaining her fraudulent narrative and pursuing extramarital relationships that she willfully ignored the harm to the Children.

**42.** Branthoover, by enabling Morgan, likewise demonstrated disregard for the impact on the Children. Defendants cannot claim ignorance – it is obvious that **children suffer when a loving parent is unjustly kept from them**. The Children here have effectively suffered the loss of a parent (albeit still living, but absent by Defendants’ design) for an extended period. This loss is analogous to, if not worse than, the loss a child experiences from a parent’s severe injury. In Texas, a child is entitled to recover for loss of parental consortium when a parent is seriously injured by a third party’s tort.

43. Defendants' intentional acts inflicted a different kind of injury on Petitioner (reputational and relational rather than physical), but the **end result for the Children is the same**: they have been **bereft of their father's daily love, guidance, and care**. The law should not countenance a situation where a tortfeasor escapes liability simply because the harm was achieved through abuse of legal process rather than physical injury.

**44. Emotional and Developmental Harm:** As detailed, the Children have experienced emotional turmoil, confusion, and grief from the sudden loss of Petitioner's involvement. They have been **denied the comfort of his love**, bedtime stories, help with homework, coaching at sports, and countless other forms of parental support that were part of their lives. This deprivation has likely caused lasting psychological harm, manifesting in anxiety, behavioral changes, and academic impacts. They have effectively lost the **daily affection and guidance of their father**, a loss that courts have recognized as compensable in tort when caused by wrongdoing. Additionally, by undermining Petitioner's ability to provide, Defendants have also jeopardized the Children's financial support. Petitioner, as the primary earner, would have used his income for the Children's benefit – providing them a stable home, educational opportunities, and necessities. When Morgan ousted Petitioner and commandeered the finances under false pretenses, the Children's financial security was damaged. For example, Morgan's misappropriation of joint funds (the \$1,576 and possibly more) and her reckless handling of assets (e.g. damaging a car that Petitioner must pay for) depleted resources that would otherwise have gone toward the Children's upbringing. Furthermore, Petitioner's diminished earning capacity resulting from this ordeal (he lost access to his home office/business and

spent substantial time on legal battles) directly translates to less support available for the Children.

45. Further, the oldest child, M.E.M., barely surpassed the third grade without the guidance of her father, someone who would always assist her with school prior to his removal. ***Exhibit 8***

**46. Children's Claim for Relief:** Considering the above, the Children, by and through Petitioner, state a cause of action for the intentional deprivation of their right to support and consortium of their father. This cause of action is grounded in general tort principles of intentional injury to familial relationships, as well as the strong public policy of Texas to protect the parent-child bond. While Texas's recognition of a child's loss-of-parent consortium claim has typically involved cases of a parent's physical injury or death, the rationale applies here with even greater force because Defendants' conduct was **intentional and malicious** toward the parent-child relationship itself. The Children were the **foreseeable and indeed intended victims** of Morgan's scheme – she knew isolating Petitioner would necessarily mean depriving the Children of their dad's care, and she proceeded anyway. Such deliberate harm to children is actionable.

**47. Damages to the Children (Count 3):** The Children seek damages for the **loss of their father's consortium, love, and affection** from January 16, 2024 to present (and continuing). This includes compensation for their **mental anguish, emotional pain, and loss of enjoyment of life** during their formative years without their father. Even at their young ages, the Children have deeply felt the loss – crying for their father, asking why he is gone, and exhibiting signs of emotional trauma. These noneconomic damages are inherently difficult to quantify, but Texas law entrusts the jury to assign a monetary value

to such losses, and **courts have allowed recovery for a child's loss of a parent's companionship and society** when caused by a defendant's tort.

48. Additionally, to the extent the Children suffered any **economic harm** (such as loss of financial support or trust funds diminished by Defendants), they seek recovery of those amounts as well.

49. The Children also seek **exemplary damages** against Defendants for this claim. Intentionally inflicting harm on minor children by robbing them of a parent is reprehensible. Morgan's actions violated her fundamental duty as a parent to act in her children's best interests, instead of using them as leverage in her deceit. Punitive damages are warranted to punish Defendants and deter others from similar conduct.

#### **IV. REQUEST FOR IMMEDIATE INJUNCTIVE RELIEF**

50. **Need for Immediate Relief:** Petitioner, both individually and as Next Friend of the Children, hereby applies for a **Temporary Restraining Order ("TRO") and Temporary Injunction to immediately restore the Children to Petitioner's custody (or at least resume meaningful possession/access)** and prevent further irreparable harm. The facts detailed above show that Petitioner has a **probable right to the relief** sought on final trial, and there is a **probable, imminent, and irreparable injury** in the interim if relief is not granted. Money damages, while sought, are inadequate to fully compensate the loss of time with one's children. **Every day that passes is irretrievable for the Children's upbringing and Petitioner's relationship with them.** No amount of money can restore lost childhood moments or erase the trauma of prolonged separation. Thus, only injunctive relief can prevent ongoing irreparable injury by restoring the status quo.

**51. Likelihood of Success on the Merits:** Petitioner has made a strong *prima facie* showing of his case. Defendants' fraud and misconduct are essentially **undisputed** – Morgan has never denied the core factual allegations, and the documentary evidence (texts, bank records, court filings) overwhelmingly supports Petitioner's claims. Petitioner has already presented much of this evidence to various courts without any rebuttal from Morgan. In essence, **Petitioner's evidence stands unchallenged**, and it demonstrates that the current custody arrangement was obtained by fraud and is contrary to law. Given this, Petitioner is exceedingly likely to prevail on the merits of his tort claims and ultimately have the prior orders set aside.

**52. Imminent, Irreparable Harm:** The harm to be enjoined is the **continued separation of the Children from Petitioner's custody and care**, and any further acts by Defendants to interfere or conceal the Children. This harm is **imminent** and ongoing – every moment of continued separation is harm occurring in real time. It is **irreparable** because once passed, time with one's children cannot be recovered or adequately compensated. The Children are growing and changing; Petitioner is missing milestones that will never repeat. Additionally, the Children's emotional well-being is at stake – prolonging the separation risks permanently damaging their relationship with Petitioner and their trust in their parents and the legal system. Texas courts recognize that **the parent-child relationship is unique and irreplaceable**, and its unjust interruption constitutes irreparable injury as a matter of law.

53. If injunctive relief is denied and Defendants are later found liable, it will be cold comfort to have a judgment for damages when the Children's childhood has already

elapsed. The urgency is underscored by the fact that **over a year has already been lost**; the Court must act now to prevent further harm.

**54. No Adequate Remedy at Law:** Petitioner has no adequate remedy at law for the injuries described. While Petitioner does seek monetary damages, those alone will not make him or the Children whole. The law does not favor substituting dollars for parents. Only the **return of the Children to Petitioner’s custody/possession** and the cessation of Defendants’ interference can truly restore the status quo and serve the Children’s best interests. The ongoing divorce proceeding has proven inadequate to promptly address the issue – despite Petitioner’s diligent efforts, the family court has not provided timely relief . Thus, equitable relief is necessary here and now.

**55. Balance of Equities and Public Interest:** The balance of equities strongly favors Petitioner and the Children. Granting the TRO/injunction merely restores what should never have been taken – a father’s presence in his kids’ lives – and aligns the situation with the truth (that Petitioner poses no danger). Denying relief would reward fraud and allow an innocent family to suffer further. Defendants cannot claim any legitimate interest in continuing to enforce a fraudulent status quo. Morgan may argue she will be inconvenienced or upset by losing sole possession, but any such “harm” is self-inflicted by her misconduct and is far outweighed by the harm to the Children of continued separation. Moreover, it is **in the public interest** to reunite the Children with Petitioner. **Texas’s public policy** (Tex. Fam. Code § 153.001) is to ensure children have frequent contact with parents who act in their best interests; – here, Petitioner unquestionably is such a parent, and nothing suggests otherwise. The public also has an interest in **deterring litigants from abusing court processes through false claims**;

granting injunctive relief sends a message that the court will not abide orders built on fraud.

56. Finally, a TRO and injunction will promote stability for the Children: rather than the current limbo, they will have both parents available, which is presumptively better for them (and even for Morgan, who can also see the Children, as the goal is to ensure both parents share time).

**57. Requested Injunctive Relief:** Therefore, Petitioner respectfully requests that the Court enter a **TRO immediately** and, after notice and hearing, a **temporary injunction**, ordering the following relief:

- **a. Immediate Custody/Access:** Morgan Michelle Myers shall **immediately surrender the Children to Petitioner's custody**. Petitioner shall be restored to possession of the Children and the marital residence at 6641 Anne Court, Watauga, TX, forthwith. In the alternative, the Court should at least **grant Petitioner immediate and unsupervised access to the Children** on a frequent schedule (e.g. joint or alternating custody) pending further orders. This ensures the Children are no longer wrongfully kept from their father.
- **b. Enjoining Interference:** Defendants (and anyone acting in concert with them) are **restrained from interfering with Petitioner's custody or access** to the Children. They shall not remove the Children from Tarrant County without Court permission, shall not conceal or hide the Children's location, and shall not take any action to prevent or hinder the contact between Petitioner and the Children.

- **c. Suspension of Prior Orders:** To the extent necessary, the Court should **suspend the operation of the March 14, 2024 “Temporary Orders” or any other orders** that currently limit Petitioner’s access to the Children as they are facially *void ab initio*. The Court has authority to do so because those orders were obtained by fraud, lack the consent of both parties, and have never served the best interests of the Children. The injunction should clarify that Morgan may not enforce any prior order to exclude Petitioner from the home or children, and that this Court’s injunctive order supersedes any conflicting provision, and that the Petitioner’s custody and access to the residence are explicitly restored pending trial on the merits.
- **d. Preservation of Evidence:** Defendants should be enjoined from destroying or altering any documents, communications, or evidence relating to the matters in this suit (including electronic evidence like text messages, emails, social media posts, bank records, etc.), to ensure a fair trial on the merits. (This is standard but particularly warranted given the allegations of fraud.)
- **e. Other Equitable Relief:** The Court may impose any other conditions deemed necessary to effectuate the purposes of the injunction, such as ordering family counseling or supervised transition if the Court finds it helpful (though Petitioner maintains he poses no risk that would necessitate supervision).

58. Petitioner is willing to provide frequent status updates. The urgency of this matter cannot be overstated – Petitioner seeks a TRO *ex parte* due to the immediate harm and asks that the Court set a hearing for a temporary injunction at the earliest possible date and then a trial on the merits on an expedited schedule.

## **V. PRAYER FOR RELIEF**

**WHEREFORE, PREMISES CONSIDERED,** Petitioner Charles Dustin Myers, individually and as Next Friend of M.E.M. and C.R.M., prays that Defendants be cited to appear and answer, and that upon final trial, Petitioner and the Children be granted judgment against Defendants for all relief requested above, including:

- **Actual damages** in an amount to fully compensate Petitioner and the Children for their injuries, including but not limited to mental anguish, loss of companionship, lost support, and other economic and non-economic damages, all within the jurisdictional limits of the Court;
- **Exemplary (punitive) damages** in an amount to punish Defendants and deter similar conduct, as allowed by law due to Defendants' malicious and fraudulent actions;
- **Permanent Injunctive Relief** upon final judgment, to the extent needed to ensure the Children's ongoing relationship with Petitioner and to bar Defendants from engaging in any further interference or retaliation;
- **Pre- and post-judgment interest** as allowed by law;
- **Court costs and reasonable attorneys' fees** (to the extent recoverable, including under Tex. Fam. Code § 42.006 for interference with possessory rights, which permits recovery of attorney's fees and costs incurred to enforce the order and prosecute the suit); and

- An expedited court order permitting Petitioner, CHARLES DUSTIN MYERS, and next friend of M.E.M. and C.R.M. to return to their lives and his residency.
- **All other and further relief** at law or in equity to which Petitioner and the Children may show themselves justly entitled. This includes, if necessary, a declaration voiding or nullifying the prior fraudulent temporary orders, and such other declaratory relief to restore the status quo and protect the Children's best interests. Petitioner also asks for any appropriate sanctions against Defendants for their abuse of the judicial process, as may be justified by the evidence.

**Respectfully submitted,**

*/s/ Charles Dustin Myers*  
**CHARLES DUSTIN MYERS**  
6641 Anne Court  
Watauga, TX 76148  
[CHUCKDUSTIN12@GMAIL.COM](mailto:CHUCKDUSTIN12@GMAIL.COM)  
817-546-3693  
*PRO-SE NEXT FRIEND*

**DATED 03-16-2025**

## **EXHIBIT LIST – COVER SHEET**

<b>TITLE</b>	<b>DATE</b>
EXHIBIT 1 – Uncontested Case Request .....	12.18.2023
EXHIBIT 2 - IFP Statement of Inability.....	12.18.2023
EXHIBIT 3 – Money Transfer .....	12.15.2023
EXHIBIT 4 – Original Petition for Divorce .....	12.18.2023
EXHIBIT 5 – Application for Protective Order.....	12.22.2023
EXHIBIT 5.1 – Evidence Discrediting Morgan’s Request for Protection.....	12.29.2023
EXHIBIT 6 – Third Party Assistance (Branthroover).....	12.16.2023
EXHIBIT 7 – Current Facially Void Orders .....	03.14.2023
EXHIBIT 8 - Eldest Child School Report Showing Regression .....	02.28.25
EXHIBIT 8.1 – Youngest Child Cavity Untreated .....	03.01.25

**\*NOTE – THIS DOCUMENT IS FULLY HYPERLINKED FOR YOUR CONVENIENCE**

# EXHIBIT 1

REQUIREMENTS FOR  
UNCONTESTED

CASES

12.18.23

**REQUIREMENTS FOR UNCONTESTED CASES INVOLVING  
SELF REPRESENTED LITIGANT WITH CHILDREN**

**THE COURT REQUIRES YOU SUBMIT A COPY OF YOUR PAPERWORK TO THE DRO ON THE 2<sup>ND</sup>  
FLOOR OF THE FAMILY LAW CENTER OR AT DRO-Legal@tarrantcountytexas.gov**

An attorney employed by Tarrant County will review your paperwork. This process will ensure that the form of your order meets the Court's standards. The attorney does not represent you or your spouse. The attorney will not give you legal advice. The attorney will inform you of the policies and preferences of the Court and will work with you to meet the court's expectations. Providing information does not constitute an attorney client relationship between you and the DRO. You may seek independent legal counsel at any time. You may also consult [www.texaslawhelp.org](http://www.texaslawhelp.org) for legal information. By signing below, you acknowledge the purpose of this service to the court and understand the instructions as outlined below.

Petitioner's Signature M. My Date: 12/18/2023

Phone Number (817) 940 - 0852 Cause No. 322 744263 23

Petitioner's Email Morwil31@gmail.com

**THE ATTORNEY WILL ONLY REVIEW UNCONTESTED CASES**

AGREED: Your case is uncontested if you and the other party agree on all terms of the case, OR

DEFAULT: Your case is uncontested if you meet all requirements for a default judgment

**BEFORE YOU SEND IN THE PAPERWORK, YOU MUST DO THESE THINGS:**

- 1) Show the Court that the other party has notice of the lawsuit by either:
  - a. Getting the other party to sign, notarize, and file a Waiver of Service with the Court, OR
  - b. Getting the other party to file an Answer with the Court, OR
  - c. Getting the other party formally served with the paperwork by either:
    - i. Getting the constable or a private process server to serve the other party, OR
    - ii. Getting the Court to approve a method of alternative service, and then proving to the Court that you have fulfilled the requirements for that alternative service,
- NOTE: If you serve your spouse by publication, there are many steps that must be completed. Please see <https://texaslawhelp.org/article/service-by-publication-when-you-cant-find-the-other-parent>.
- 2) Complete the mandatory waiting period before submitting your final paperwork.
  - a. In divorce cases, you MUST wait 60 days after you filed the petition.
  - b. In other default cases, you may have to wait 27 days after service was completed.

**WHEN YOU SEND IN THE PAPERWORK, DO THESE THINGS:**

- 1) Leave a completed Final Order on 2<sup>nd</sup> floor of Family Law Center or email to [DRO-legal@tarrantcountytexas.gov](mailto:DRO-legal@tarrantcountytexas.gov)
- 2) Include a possession schedule. You can find templates at [texaslawhelp.org](http://texaslawhelp.org).
- 3) Include an Austin Form.
- 4) Include a signed copy of this document with your case information on it.
- 5) Include a copy of any prior orders involving the children.
- 6) For default judgements, include proof of service as filed with the court, a signed Certificate of Last Known Address, and a signed Military Status Affidavit.
- 7) If your case involves child support, include both a completed Record of Child Support and Income Withholding Order.
- 8) Only scanned copies will be accepted. Photos of the paperwork will be rejected.

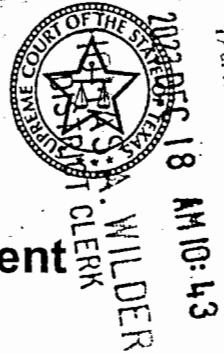
**AFTER YOU SEND IN THE PAPERWORK:** An attorney or Legal Support Officer will contact you in around 10 days to start the review. After the review is complete, the attorney will forward your paperwork to the judge for approval or give you further instructions on how to present your paperwork to the Court.

EXHIBIT 2

MORGAN'S  
IFP

12.18.23

**NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA**  
**AVISO: ESTE DOCUMENTO CONTIENE INFORMACIÓN**  
**CONFIDENCIAL**



FILED  
TARRANT COUNTY

**Statement of Inability to Afford Payment  
of Court Costs or an Appeal Bond**

**Declaración sobre Incapacidad de Pago de Costas  
de Tribunal o de una Fianza de Apelación**

Cause Number  
Número de Caso

322 744263 23

The Clerk's office will fill in the Cause Number when you file this form.

El Secretario del Tribunal anotará el Número de Caso cuando usted presente este formulario.

MORGAN MICHELLE MYERS

v.

CHARLES DUSTIN MYERS

Copy information listed at the top left of the petition here.

Copie aquí la información ubicada en la parte superior izquierda del escrito de la demanda.

Copy information listed at the top right of the petition here.

Copie aquí la información ubicada en la parte superior derecha del escrito de la demanda.

Court Number  
Número del Tribunal

TARRANT, Texas  
County  
Condado

- District Court  
Tribunal de Distrito
- County Court  
Tribunal del Condado
- County Court at Law  
Tribunal Estatutario
- Justice Court  
Juzgado de Paz
- Probate Court  
Juzgado Sucesorio

### 1. Your Information / Su Información

- My full legal name is / Mi nombre legal completo es

MORGAN MICHELLE MYERS

First Middle Last / Nombre de Pila Segundo Nombre Apellido

- My date of birth is / Mi fecha de nacimiento es

Month Day Year / Mes Día Año

- My address is / Mi dirección es

Home / Domicilio 6641 ANNE CT WATAUGA, TX 76148

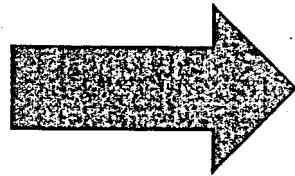
Mailing / Dirección Postal SAME AS ABOVE

- My phone number / Mi número telefónico (817) 946 - 0852

- My email I check often / Mi correo electrónico que reviso con frecuencia

morwi131@gmail.com

Go to next page



Pase a la siguiente página

## 2. About My Dependents / Mis Dependientes

"The people who depend on me financially are listed below." Use initials only for children under 18. If needed, attach a separate piece of paper to list more dependents.

"Las personas a continuación dependen económicamente de mí." Use iniciales para los menores de 18 años y, si es necesario, anexe una hoja por separado para enumerar a todos sus dependientes.

Name Nombre	Age Edad	Relationship to me Parentesco Conmigo
M [REDACTED] M [REDACTED]	7	DAUGHTER
C [REDACTED] M [REDACTED]	5	DAUGHTER

## 3. Are you represented by Legal Aid? ¿Está siendo representado por alguna entidad de asistencia legal?

Check only one box. Seleccione solo una casilla.

I am being represented in this case for free by an attorney who works for a legal aid provider or who received my case through a legal aid provider. I have attached the certificate the legal aid provider gave me as "Exhibit: Legal Aid Certificate."

Me está representando gratuitamente un abogado que trabaja para una entidad de asistencia legal o que recibió mi caso de una entidad de asistencia legal. El certificado que la entidad de asistencia legal me entregó lo adjunto bajo el título, "Anexo: Certificado de Asistencia Legal."

or / o

I am not represented by legal aid.

No me está representando ninguna entidad de asistencia legal.



#### 4. Public Benefits / Beneficios de Asistencia Pública

➤ Do you or any of your dependents receive public benefits?

*¿Recibe usted o sus dependientes beneficios de asistencia pública?*

Yes / Sí

No / No

➤ If you answered yes, check all that apply and attach proof to this form, such as a copy of an eligibility form or check.

Si respondió con un Sí, marque todas las casillas que apliquen y adjunte a este formulario comprobantes, tales como una copia de la carta autorizando que reciba estos beneficios o una copia del cheque que recibe.

Food stamps/SNAP  
Cupones de comida/SNAP

TANF

Medicaid

CHIP

SSI/SSDI

WIC

Lifeline

Public Housing or Section 8 Housing  
Asistencia de Vivienda / Programa de  
Vivienda bajo Sección 8

Low-Income Home Energy  
Assistance  
Asistencia con Energía  
Eléctrica

Community Care via HHS  
Ayuda Comunitaria bajo HHS

LIS in Medicare ("Extra Help")  
Subsidio Adicional de Medicare  
bajo el Programa LIS

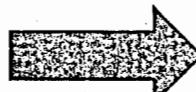
Needs-based VA Pension  
Pensión para Veteranos de Guerra en  
función a necesidades

Child Care Assistance under  
Child Care and Development  
Block Grant  
Asistencia con Guardería bajo  
el Programa CCDBG

County Assistance, County Health  
Care, or General Assistance (GA)  
Asistencia del Condado, Asistencia  
Médica del Condado, o Asistencia  
General (GA)

Other / Otros beneficios

Other / Otros beneficios



5. What are your monthly income sources? ¿Cuáles son sus fuentes de ingresos mensuales?

➤ My take-home pay is \$ 744 in monthly wages.

Mi pago neto es \$ \_\_\_\_\_ en sueldo mensual.

PART-TIME RECREATION

➤ I work as a ASSISTANT (your job title) for CITY OF WATAUGA (your employer).

Yo trabajo como \_\_\_\_\_ (título de su puesto) para  
\_\_\_\_\_ (compañía o jefe).

➤ \$ 744 is my total monthly income / son mis ingresos totales al mes.

These are my income sources. Estas son mis fuentes de ingresos.

➤ \$ 0 in unemployment / en beneficios de desempleo.

I have been unemployed since N/A (date).

He estado desempleado desde \_\_\_\_\_ (indique fecha).

➤ \$ 0 in public benefits / en beneficios de Asistencia Pública.

➤ \$ 0 from people in my household other than my spouse / de  
ingresos de otras personas en mi hogar que no son de mi cónyuge.

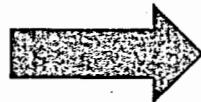
➤ \$ 0 from retirement or pension / de jubilación o pensión.

➤ \$ 0 from tips or bonus / de propinas o bonos.

➤ \$ 0 from disability / de discapacidad.

➤ \$ 0 from worker's comp / de compensación al trabajador.

➤ \$ 0 from social security / de seguro social.



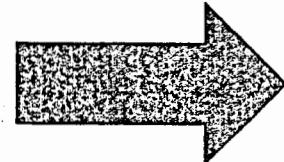
- \$ 0 from military housing / de vivienda militar.
- \$ 0 from dividends, interest, or royalties / de dividendos, intereses, o regalías.
- \$ 0 from child or spousal support / de manutención de menores o manutención conyugal recibida.
- Answer only if your spouse is not your opponent. Responda tan sólo si su cónyuge no es parte contraria en esta causa legal. \$ 0 from my spouse's income / de ingresos de mi cónyuge.
- \$ 0 from other jobs/sources of income / de otros trabajos/fuentes de ingresos.

Describe / describa:

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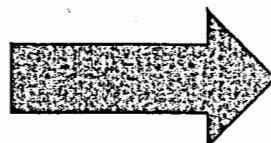
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Pase a la siguiente página

**6. What is the value of your assets or property? ¿Cuál es el valor de sus bienes o propiedades?**

My property includes: Mis bienes incluyen:	Value / Valor
	The value is the amount the item would sell for less the amount you still owe on it, if anything.
	El valor de sus bienes es la cantidad por la que la propiedad o pertenencia se vendería, menos el monto que aún se adeuda, si lo hubiera.
➤ Cash Dinero en efectivo	\$ 0
➤ Bank accounts, other financial assets Cuentas bancarias, otros bienes financieros	
CHASE BANK	\$ 21.00
	\$
	\$
➤ Cars and boats (make and year) Automóviles, lanchas (modelo y año)	
MAZDA CX5 2023	\$ 451.00 / MONTH
	\$
	\$
➤ Other property like jewelry, stocks, land, a second house. (Do not list your homestead.) Otros bienes como joyas, acciones, terrenos, una segunda casa. (No indique su hogar familiar.)	
N/A	\$
	\$
	\$
Total Value of Property Valor Total de Sus Bienes	\$ 371



**7. What are your monthly expenses that are not deducted from your paycheck?  
¿Cuáles son sus gastos mensuales que no son descontados de su cheque de sueldo?**

My monthly expenses are: Mis gastos mensuales son:	Amount Cantidad
➤ Rent/house payments; maintenance Alquiler/hipoteca; mantenimiento de casa	\$ 800
➤ Food and household supplies Alimentos y artículos para el hogar	\$ 300
➤ Utilities and telephone Luz, gas, agua y teléfono	\$ 510
➤ Clothing and laundry Ropa y lavado de ropa	\$ Ø
➤ Medical and dental expenses Gastos médicos y dentales	\$ Ø
➤ Insurance (life, health, auto, etc.) Seguros (de vida, médico, de automóvil etc.)	\$ Ø
➤ School and childcare Escuelas y guarderías	\$ Ø
➤ Transportation, auto repair, gas Transportación, reparaciones de automóviles, gasolina	\$ Ø
➤ Child/Spousal support Manutención a Menores/Manutención Conyugal	\$ Ø
➤ Debt payments to (list): Pagos por deudas hechas a (indíquelas):	
N/A	\$
	\$
➤ Wages withheld by court order Sueldo retenido por orden judicial	\$ Ø
➤ Other expenses (list): Otros gastos (indíquelos):	
N/A	\$
	\$
<b>Total Monthly Expenses Gastos Totales Mensuales</b>	<b>\$ 1,610</b>



**8. Are there debts or other facts explaining your financial situation?  
¿Hay deudas u otros factores que expliquen su situación económica?**

My debts include (list debt and amount owed):

Mis dudas incluyen (indique deuda y la cantidad que debe):

MAZDA CX 5 2023	\$ 451 / MONTH
MAZDA CX 3 2021	\$ 368 / MONTH
	\$
	\$
	\$

If you want the court to consider other facts, such as unusual medical expenses, family emergencies, etc., attach another page to this form labeled "Exhibit: Additional Supporting Facts."

Si usted desea que el tribunal considere otros factores, tales como gastos médicos excepcionales, emergencias familiares, etc., adjunte al formulario otra hoja con esta información y bajo el título, "Anexo: Información Adicional de Apoyo."

**9. Ability to Pay Court Costs. Declaración sobre su Habilidad de Pagar Costas de Tribunal**

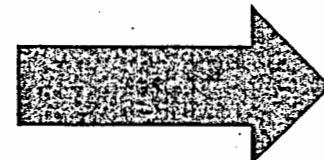
Check only one box. Seleccione tan solo una casilla.

I cannot afford to pay court costs. No puedo pagar las costas de tribunal.

I cannot furnish an appeal bond or pay a cash deposit to appeal a justice court decision, and I cannot afford to pay court costs.

No puedo aportar una fianza de apelación ni pagar un depósito en efectivo para apelar la decisión judicial de un magistrado, y no puedo pagar costas de tribunal.

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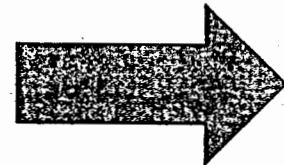
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**10. Declaration/Affidavit. Declaración Escrita Bajo Juramento.**

Fill out **only one** box. If you fill out the Declaration, you will not need to sign the form in front of a notary public. If you do not want to list your address for privacy or safety concerns, take the form and photo identification, and fill out the Affidavit box in front of a notary public.

Llene tan **solo una** opción. Si usted llena la Declaración, no necesitará firmar el formulario ante un notario. Si usted no quiere que aparezca su domicilio en el documento para conservar su privacidad o por motivos de su seguridad, lleve el formulario y una identificación con fotografía y llene la sección de la Declaración Escrita Bajo Juramento ante un Notario.

**Go to next page**



**Pase a la siguiente página**

## Option 1 / Opción 1

**Declaration:** I declare under penalty of perjury that the foregoing is true and correct.

**Declaración:** Yo declaro bajo pena de perjurio que la información a continuación es correcta y verdadera.

- My name is / Mi nombre es

MORGAN MICHELLE MYERS

- My date of birth is / Mi fecha de nacimiento es

- My address is / Mi domicilio es

6641 ANNE CT WATAUGA, TX 76148

Street, city, zip, country

Calle y número, ciudad, estado, código postal, pais

- 

Signature  
Firma

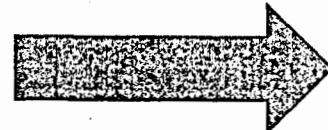
- 12/19/2023

Date (month, day, year)  
Fecha (mes, día, año)

- TARRANT, TX

County, state  
Condado, estado

Go to next page



Pase a la siguiente página

## Option 2 / Opción 2

**Affidavit:** I swear under penalty of perjury that the foregoing is true and correct.

**Declaración Escrita Bajo Juramento:** Yo juro bajo pena de perjurio, que lo que precede es correcto y verdadero.

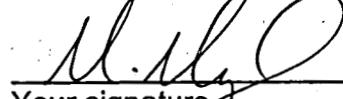
You fill out this section.

Usted llena esta sección.

> MORGAN MICHELLE MYERS

Your printed name

Su nombre en letra de molde

> 

Your signature

Su firma

The notary fills out this section.

El Notario llena esta sección.

>

Subscribed before me this day of

Juramentado y suscrito ante mí el día de hoy del mes de

, 20\_\_\_\_

NOTARY  
NOTARIO

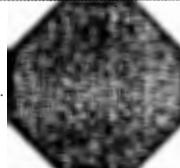


EXHIBIT 3

MONEY  
TRANSFER

12.15.23

< M My Wife



You're implying that there's more you haven't told me about, yet demanding the \$1,576 I transferred to make sure it didn't go somewhere that I can't access..

★ 10:03 PM

Tuesday, December 19, 2023

The only thing filed is a petition for divorce. It's not an actual agreement. All of the details that we need to sit down and agree on will officially happen in 61 days.

★ 5:22 PM

Friday, December 22, 2023



Read ★ 7:50 PM

# Virtual Wallet Spend Statement

 For 24-hour information, sign on to PNC Bank Online Banking  
on pnc.com

For the period 12/02/2023 to 01/02/2024  
CHARLES MYERS  
Primary account number: [REDACTED] -8826

Account Number: [REDACTED] - continued

Page 4 of 6

## Banking/Debit Card Withdrawals and Purchases

- continued

Date	Amount	Description
12/15	1.33	3117 Debit Card Purchase Paypal *dkb575
12/18	1,576.00	3117 Debit Card Purchase Paypal *Dmb575
12/18	10.65	3117 Recurring Debit Card Microsoft*Xbox Game P
12/19	80.00	3117 Debit Card Purchase Google *Svcs753f2d7d-7
12/19	3.19	POS Purchase Google *Google Mountain Vie Ca
12/20	9.73	3117 Debit Card Purchase Prime Video *Zb2Ax6Hc3
12/20	1.00	3117 Debit Card Purchase Elevenlabs.Io
12/21	12.99	3117 Recurring Debit Card Abcmouse.Com*
12/21	38.86	3117 Debit Card Purchase DD Doordash Sonicdriv
12/21	80.00	3117 Debit Card Purchase Google *Svcs07659609-d
12/21	14.02	3117 Debit Card Purchase Wmt Plus Dec 2023
12/26	55.17	3117 Debit Card Purchase Amzn Mktp US*R35H22C73
12/26	138.38	3117 Debit Card Purchase Amzn Mktp US*Ui1Wh8M23
12/26	31.37	3117 Debit Card Purchase Amzn Mktp US*1I3TH8Gf3
12/26	15.14	3117 Recurring Debit Card Google *Youtubepremiu
12/26	80.72	3117 Recurring Debit Card Att*Bill Payment
12/26	188.35	3117 Recurring Debit Card Openai Httpsopenai C
12/26	52.89	3117 Recurring Debit Card Discord* 10Xserverboo
12/26	118.43	3117 Recurring Debit Card Klarna Klarna.Com
12/27	80.00	3117 Debit Card Purchase Google *Svcsd05bfd7b-1
12/28	25.40	3117 Debit Card Purchase Til*PI Cicis 22 Hurst
12/28	20.00	3117 Debit Card Purchase Cicis Pizza 22 Arcade
12/28	16.85	3117 Debit Card Purchase Big Z Watauga Tx
12/28	6.99	3117 Recurring Debit Card Atom Finance, Inc.
12/28	2.10	3117 Debit Card Purchase Ism, Inc. DBA Airup
12/28	5.32	3117 Debit Card Purchase Amznfreetime*XI50U2M73
12/29	10.00	3117 Debit Card Purchase Big Z Watauga Tx
12/29	17.16	3117 Debit Card Purchase Shell Oil 57543389001
12/29	2.80	3117 Debit Card Purchase Shell Oil 57543389001

Banking/Debit Card Withdrawals and Purchases continued on next page



+19403123434



8:19 PM

Dec 16, 2023

She transferred money to her own account  
that you said was hers. End of discussion.  
Have a good evening.

8:20 PM

By the way, the money IS hers. Community  
property state.

8:21 PM

# You sent \$1.00 USD to Daniel Branthroover

## Transaction Details

**Transaction ID**[69W824410S437530E](#)**Transaction date**

December 8, 2024

**Money sent**

\$1.00 USD

**Fee**

\$0.33 USD

Paid with:

VISA x-8126

\$1.33 USD

This transaction will appear on your statement as **PAYPAL \*Dmb575****You paid**

\$1.33 USD

**Daniel Branthroover will receive**

\$1.00 USD

[Get the Details](#)

EXHIBIT 4

ORIGINAL  
PETITION  
FOR DIVORCE

12.18.23

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA.

Cause Number:

322 744263 23

In the Matter of the Marriage of

Petitioner: Morgan Michelle Myers

Print first, middle and last name of the spouse who filed for divorce.

And

In the \_\_\_\_\_  
(Court Number)

District Court  
 County Court at Law

Respondent: Charles Dustin Myers

Print first, middle and last name of other spouse.

Tarrant County, Texas

And in the Interest of:

(Print the initials of each child you and your spouse have together who is under 18 or still in high school.)

1. M E M      2. C R M      3. \_\_\_\_\_  
4. \_\_\_\_\_      5. \_\_\_\_\_      6. \_\_\_\_\_

## Original Petition for Divorce

Print your answers.

My name is: Morgan Michelle Myers

First

Middle

Last

I am the **Petitioner**, the person asking for a divorce.

The last three numbers of my driver's license number are 579. My driver's license was issued in (State): Texas.

or  I do not have a driver's license number.

The last three numbers of my social security number are: 893.

or  I do not have a social security number.

My spouse's name is: Charles Dustin Myers

First

Middle

Last

My spouse is the **Respondent**.

### 1. Discovery Level

The discovery level in this case, if needed, is Level 2.

### 2. Legal Notice (Check one box.)

- I think my spouse will sign a Waiver of Service (or Answer). Do not send a sheriff, constable, or process server to serve my spouse with a copy of this Petition for Divorce at this time.
- I will have a sheriff, constable, process server or clerk serve my spouse with this Petition for Divorce here:  
6641 Anne Court, Watauga, Texas 76148

Street Address

City

State

Zip

If this is a work address, name of business: \_\_\_\_\_

I ask the clerk to issue a Citation of Service (the form necessary to provide legal notice to my spouse by "Official Service of Process"). I understand that I will need to pay the fee (or file a Statement of Inability to Afford Payment of Court Costs if I am unable to pay the fee) and arrange for service.

- I cannot find my spouse. I ask that my spouse be served by publication. I understand I must file an Affidavit for Citation by Publication and hire a lawyer to serve as attorney ad litem for me.



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

AFFIDAVIT OF INABILITY

FILED  
COURT  
TARRANT  
2023 DEC 18 AM 10:43  
THOMAS A. WILDER  
DISTRICT CLERK

### **3. Jurisdiction**

#### **3A. County Residence Requirement**

(Check all boxes that apply.)

- I have lived in this county for the last 90 days.
- My spouse has lived in this county for the last 90 days.
- I am serving in the armed forces or other government service outside of Texas, but this county has been the home county of either my spouse or me for at least 90 days.
- I have accompanied my spouse who is serving in the armed forces or other government service outside of Texas, but this county has been the home county of either my spouse or me for at least 90 days.

#### **3B. Texas Residence Requirement**

(Check all boxes that apply.)

- I have lived in Texas for the last six months.
- My spouse has lived in Texas for the last six months.
- I am serving in the armed forces or another government service outside of Texas, but Texas is the home state of either my spouse or me and has been for at least 6 months.
- I have accompanied my spouse who is serving in the armed forces or another government service outside of Texas, but Texas is the home state of either my spouse or me and has been for at least 6 months.

#### **3C. Personal Jurisdiction over Spouse**

(Check one box.)

- My spouse lives in Texas.
- My spouse does not live in Texas. (Check any boxes that apply below.)
  - My spouse agrees that a Texas court can make orders in this divorce, including orders regarding conservatorship (custody), visitation, and financial support of our children and orders regarding our property and debts. My spouse will file a Waiver of Service (or Answer).
  - Texas is the last state where we lived together as a married couple. This Petition for Divorce is filed less than two years after we separated.
  - The children live in Texas because of my spouse's actions.
  - My spouse has lived in Texas with the children.
  - My spouse has lived in Texas and provided prenatal expenses or support for the children.
  - My spouse had sexual intercourse in Texas, and the children may have been conceived by that act of intercourse.
  - Our child was born in Texas and my spouse registered with the paternity registry maintained by the bureau of vital statistics or signed an acknowledgment of paternity.
  - My spouse will be personally served with citation (official service of process) in Texas.



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

#### **4. Dates of Marriage and Separation**

My spouse and I got married on or about: July 20<sup>th</sup>, 2015

Month

Day

Year

We stopped living together as spouses on or about: December 1<sup>st</sup>, 2023

Month

Day

Year

#### **5. Grounds for Divorce**

I ask the Court to grant me a divorce. The marriage has become insupportable due to discord or conflict of personalities that destroys the legitimate ends of the marital relationship and prevents any reasonable expectation of reconciliation.

#### **6. Children**

##### **6A. Children Husband and Wife Have Together**

My spouse and I are the parents of the following children who are under 18 years old or over 18 years old and still in high school.

(You MUST list all children you and your spouse have together (adopted or biological) who are under 18 or over 18 and still in high school.)

Child's name	Date of Birth	Place of Birth	State where child lives now
1. M [REDACTED] M [REDACTED]	[REDACTED]/16 Ft. Worth	[REDACTED]	Texas
2. C [REDACTED] M [REDACTED]	[REDACTED]/18 Ft. Worth	[REDACTED]	Texas
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____

##### **6B. Jurisdiction over Children**

(Check one box.)

- The children live in Texas now and have lived in Texas for at least the past 6 months or since birth.  
 The children do not live in Texas now, but they have been gone from Texas for less than 6 months. The children lived in Texas the 6 months before they moved. A parent or person acting as a parent continues to live in Texas.  
 None of the above apply.

(Check box below only if true.)

- There are **no court orders** about any of the children listed above. No other court has continuing jurisdiction over this case or the children.



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

## 6C. Children's Property

(Check one box.)

- The children do not own any property of significant value in their own name.  
 The children own the following property of significant value in their own name:  
\_\_\_\_\_

## 6D. Conservatorship (Custody) of the Child(ren)

I ask the court to make conservatorship (custody) orders as follows: (Check a, b, or c.)

- a.  Mother and Father should be **Joint Managing Conservators** of the child(ren) and:

(If you checked a, check a-1, a-2, or a-3.)

- a-1.  Father should have the exclusive right to designate the primary residence of the child(ren) within the following geographic area: (Check one box below.)

anywhere.       this county.       this county or county adjacent to this county.  
 Texas.       other: \_\_\_\_\_

- a-2.  Mother should have the exclusive right to designate the primary residence of the child(ren) within the following geographic area: (Check one box below.)

anywhere.       this county.       this county or county adjacent to this county.  
 Texas.       other: \_\_\_\_\_

- a-3.  Neither parent should have the exclusive right to designate the primary residence of the child(ren) but both parents should be ordered not to move the child(ren) out of the following geographic area: (Check one box below.)

this school district: \_\_\_\_\_  this county.  
 this county or county adjacent to this county.  other: \_\_\_\_\_

- b.  Mother should be the **Sole Managing Conservator** of the child(ren) with the exclusive rights listed in Texas Family Code 153.132 including the exclusive right to designate the primary residence of the child(ren) anywhere.

- c.  Father should be the **Sole Managing Conservator** of the child(ren) with the exclusive rights listed in Texas Family Code 153.132 including the exclusive right to designate the primary residence of the child(ren) anywhere.

## 6E. Child(ren)'s Passports (Check only if applicable.)

- I ask the Court to order that I have the exclusive right to apply for and renew passports for the child(ren).



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

#### **6F. Possession of and Access to the Child(ren) (Visitation)**

I ask the court to make possession and access (visitation) orders as follows: (Check a, b, c, or d.)

- a.  Father should have "standard visitation." (See Texas Family Code Chapter 153, Subchapter F.)
- b.  Mother should have "standard visitation." (See Texas Family Code Chapter 153, Subchapter F.)
- c.  "Standard visitation" would be unworkable or inappropriate. Possession and access to the child(ren) should be as follows:  

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- d.  I am concerned about the safety of the children with the other parent: I ask that:  
(If you checked d, check all that apply below.)
  - d-1.  exchanges of the child(ren) be supervised, or in the alternative, be in a public place.
  - d-2.  the other parent's possession of the child(ren) be limited to day visits.
  - d-3.  the other parent's possession of the child(ren) be supervised.
  - d-4.  the other parent have no right to possession or access to the child(ren).
  - d-5.  the other parent be ordered not to use alcohol or illegal drugs 24 hours prior to or during possession of the child(ren).
  - d-6.  the other parent's possession and access to the children be restricted as follows:  

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(Check only if you are asking that a different possession order be in place while a child is under 3 years old.)

- One or more of the children is under 3. Until the child turns 3, possession should be as follows:  

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After the child turns 3, possession should be as checked above.

(Check only if applicable.)

- I am concerned that the other parent may take the child(ren) to another country and refuse to return them. I ask the Court to determine if there is a risk of international kidnapping by the other parent and to take such measures as are necessary to protect the child(ren).

#### **6G. Child Support, Medical Support, and Dental Support for the Child(ren)**

I ask the court to make appropriate orders for the financial support of the child(ren), including regular child support, medical support, dental support and, if supported by the evidence, retroactive child support.



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

## **7. Is the wife pregnant?**

(Check one box.)

The wife in this marriage **is not** pregnant.

The wife in this marriage **is** pregnant. I understand that I cannot finish the divorce until after the child is born.

(If the wife is pregnant, also check one box below.)

The husband **is** the father of this child. I ask the court to include orders for custody, visitation, child support, and medical and dental support for the child in the Final Decree of Divorce.

The husband **is not** the father of this child. I understand that paternity of the child must be established before I can finish the divorce.

## **8. Did the wife have a child with another man while married to the husband?**

(Check one box. Fill in the requested information, if applicable.)

The wife **did not** have a child with another man while married to the husband.

The wife **did** have a child with another man while married to the husband. All of the children born during the marriage that are not the Husband's adopted or biological children are named below:

Child's name	Age	Date of Birth	Sex
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____

(If the wife had a child or children with another man during the marriage, check one box below.)

Paternity of the child(ren) named above **has not** been established. I understand that paternity of the child(ren) must be established before I can finish my divorce.

Paternity of the child(ren) named above **has** been established:

(Check one box.)

A court order has established that another man is the biological father and/or the Husband is not the biological father of the child(ren) listed above. I understand I must attach a file-stamped copy of the court order to my Final Decree of Divorce.

An Acknowledgement of Paternity was signed by the biological father and a Denial of Paternity was signed by the Husband for the child(ren) listed above. I understand I must attach a copy of these documents to my Final Decree of Divorce.



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

**9. Protective Order Statement** (Check the appropriate boxes. Fill in the requested information.)

**9A. No Protective Order**

- I do not have a protective order against my spouse and I have not asked for one.  
 My spouse does not have a protective order against me and has not asked for one.

**9B. Pending Protective Order**

- I have filed paperwork at the courthouse asking for a protective order against my spouse, but a judge has not decided if I should get it. I asked for a protective order on 12/14/2023

Date Filed

In Tarrant County, Texas. The cause number is \_\_\_\_\_  
County State Cause Number

If I get a protective order, I will file a copy of it before any hearings in this divorce.

- My spouse has filed paperwork asking for a protective order against me, but a judge has not decided if my spouse will get it. My spouse asked for a protective order on \_\_\_\_\_

Date Filed

in \_\_\_\_\_ County, \_\_\_\_\_. The cause number is \_\_\_\_\_.  
County State Cause Number

If my spouse gets a protective order, I will file a copy of it before any hearings in this divorce.

**9C. Protective Order in Place**

- I do have a protective order against my spouse. I got the protective order in \_\_\_\_\_ County, \_\_\_\_\_ on \_\_\_\_\_.  
County State Date Ordered

The cause number for the protective order is \_\_\_\_\_  
Cause Number

Either I have attached a copy of the protective order to this petition or I will file a copy of it with the court before any hearings in this divorce.

- My spouse does have a protective order against me. The protective order was made in \_\_\_\_\_ County, \_\_\_\_\_ on \_\_\_\_\_.  
County State Date Ordered

The cause number for the protective order is \_\_\_\_\_  
Cause Number

Either I have attached a copy of the protective order to this petition or I will file a copy of it with the court before any hearings in this divorce.

**10. Waiver of Waiting Period Based on Family Violence** (Check only if applicable.)

- I ask the Court to waive the 60-day waiting period for divorce because: (Check one box.)

- My spouse has been convicted of or received deferred adjudication for a crime involving family violence against me or a member of my household.

- I have an active protective order or an active magistrate's order for emergency protection against my spouse because of family violence during our marriage. The order includes a finding that my spouse committed family violence.



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

## 11. Property and Debt

### 11A. Community Property and Debt

If my spouse and I can agree about how to divide the property and debts we got during our marriage, I ask the Court to approve our agreement. If we cannot agree, I ask the Court to divide our community property and debts according to Texas law.

### 11B. Separate Property

I own the following separate property. I owned this property before I was married, or I received this property as a gift or inheritance during my marriage or I received this property as recovery for personal injuries that occurred during the marriage (not including any recovery for lost wages or medical expenses). I ask the Court to confirm this property as my separate property.

(Fill in all lines. If you have no property to list in a particular category, write "none.")

House located None

Street Address	City	State	Zip
----------------	------	-------	-----

Land located at: None

Street Address	City	State	Zip
----------------	------	-------	-----

Cars, trucks, motorcycles, or other vehicles

Year	Make	Model	Vehicle Identification No. [VIN]-
2023	Mazda	CX-5	JM3KFBCM1P0135569
2021	Mazda	CX-3	

Other money or personal property I owned before I was married, received as a gift or inheritance during my marriage or property I purchased during my marriage with separate property funds: None

Money I received as recovery for personal injuries that occurred during the marriage that was not for lost wages or medical expenses: None



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

## 12. Name Change

(Check one box.)

- I am NOT asking the Court to change my name.  
 I ask the Court to change my name back to a name I used before my marriage. I am not asking the court to change my name to avoid criminal prosecution or creditors. I ask that my name be changed to:

Morgan Michelle Wilson

First

Middle

Last

The children: (Check all that apply.)

- have private health insurance.

Name of insurance company: \_\_\_\_\_

Policy number: \_\_\_\_\_ Cost of premium: \$ \_\_\_\_\_

Name of person who pays for insurance: \_\_\_\_\_

The insurance policy  is  is not available through the parent's work.

- have health insurance through Medicaid.

have health insurance through C.H.I.P. Cost of premium (if any): \$ \_\_\_\_\_

- do not have health insurance.

If the children do not have private health insurance also complete the following:

Private dental insurance  is  is not available to Father at a reasonable cost.

Private dental insurance  is  is not available to Mother at a reasonable cost.

## 13. Dental Insurance Availability for Children

The child(ren): (Check all that apply.)

- have private dental insurance.

Name of insurance company: \_\_\_\_\_

Policy number: \_\_\_\_\_ Cost of premium: \$ \_\_\_\_\_

Name of person who pays for insurance: \_\_\_\_\_

The insurance policy  is  is not available through the parent's work.

- have dental insurance through Medicaid.

- do not have dental insurance.

Private dental insurance  is  is not available to Father at a reasonable cost. Private

dental insurance  is  is not available to Mother at a reasonable cost.



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

## 14. Public Benefits

(Check any boxes that apply.)

- The child(ren) have Medicaid now or had it in the past.
- The child(ren), or someone on behalf of the child(ren), get TANF (Temporary Assistance for Needy Families) now or got it in the past.

## 15. Family Information

(Check only if applicable.)

- I believe my children or I will be harassed, abused, seriously harmed or injured or otherwise subjected to family violence if I must give my spouse the information checked below for myself and the child(ren):

home address,  mailing address,  employer,  work address,  
 home phone,  work phone,  social security no.,  driver's license #.

I ask the Court to Order that I not have to give this information or notice of changes in this information to my spouse. I also ask the Court to keep this information confidential.

## 16. Request for Judgment

I ask the Court to grant my divorce. I also ask the Court to make the other orders I have asked for in this Petition and any other orders to which I am entitled.

Respectfully,

→   
Petitioner's Signature

12/18/2023  
Date

MORGAN MICHELLE MYERS

Petitioner's Name (Print)

1641 ANNE CT

Mailing Address

Email Address: morwi131@gmail.com

Phone

WATAUGA

City

TX

76148

Zip

Fax (if available)

I understand that I must notify the Court and my spouse's attorney (or my spouse if my spouse does not have an attorney) in writing if my mailing address or email address changes during these divorce proceedings. If I don't, any notices about this case including the dates and times of hearings will be sent to me at the mailing address or email address above.

## 17. Certificate of Service to the Office of the Attorney General (OAG)

I certify that a true copy of this Petition was served on the Office of the Attorney General Child Support Division\* in person, by certified and first-class mail, by commercial delivery service, by fax, by email, or through the electronic file manager on this date.



Petitioner's Signature

Date



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz  
11

# EXHIBIT 5

## APPLICATION FOR PROTECTIVE ORDER

12.22.23

Cause No.:

322 744538 23Applicant: MORGAN MICHELLE MYERS

v.

In the DISTRICT  
 of TARRANT

Respondent: CHARLES DUSTIN MYERS

FILED  
 COURT  
 TARRANT COUNTY  
 2023 DEC 22 PM 3:17  
 THOMAS A. WILDER  
 DISTRICT CLERK  
 County, Texas  
 Clerk

## Application for Protective Order

## 1 Parties

Name:

Applicant: MORGAN MICHELLE MYERS

County of Residence:

TARRANTRespondent: CHARLES DUSTIN MYERSTARRANTRespondent's address for service: 1641 ANNCT WATAUGA, TX 76148

Check all that apply:

- The Applicant and Respondent are or were members of the same family or household.  
 The Applicant and Respondent are parents of the same child or children.  
 The Applicant and Respondent used to be married.  
 The Applicant and Respondent are or were dating.  
 The Applicant is an adult asking for protection for the Children named below from child abuse and/or family or dating violence.  
 The Applicant is dating or married to a person who was married to or dating the Respondent.

## 2 Children: The Applicant is asking for protection for these Children under age 18:

Name:

Is Respondent the biological parent?

County of Residence:

- a. M [REDACTED] M [REDACTED]  
 b. C [REDACTED] R [REDACTED] M [REDACTED]  
 c. \_\_\_\_\_  
 d. \_\_\_\_\_

- Yes  No  
 Yes  No  
 Yes  No  
 Yes  No

TARRANT  
TARRANT

Check all that apply:

- Other children are listed on a sheet attached to this Application.  
 The Children are or were members of the Applicant's family or household.  
 The Children are the subject of a court order affecting access to them or their support.

## 3 Other Adults: The Applicant is asking for protection for these Adults, who are or were members of the Applicant's family or household, or are in a dating or marriage relationship with the Applicant.

Name:

County of Residence:

- a. \_\_\_\_\_  
 b. \_\_\_\_\_

## 4a Other Court Cases: Are there other court cases, like divorce, custody, support, involving the Applicant, Respondent, or the Children?

- Yes  No

If "Yes," say what kind of case and if the case is active or completed.

DIVORCE - ACTIVEIf "completed," (check all that apply):  A copy of the final order is attached. A copy of the final order will be filed before the hearing on this Application. The Texas Office of the Attorney General Child Support Division has been involved with a child support case. List the agency case number for each open case, if known. Case Number: \_\_\_\_\_

- 4b Presumption of Family Violence:** Has the Respondent ever been convicted of or placed on deferred adjudication community supervision for any crime under Title 5 or Title 6 of the Texas Penal Code? (see list of crimes at the end of the kit)

Yes  No

If "Yes," say what kind of case:

If the Respondent was convicted or placed on community supervision for a Title 5 crime, did the Court make a finding that the crime involved family violence?

Yes  No

Was the crime against a child listed in this petition under Number 2 "Children"?

Yes  No

Have the Respondent's parental rights to this child been terminated?

Yes  No

Is the Respondent seeking or attempting to seek contact with this child?

Yes  No

**5 Grounds:** Why is the Applicant asking for this Protective Order? Check one or both:

The Respondent committed family violence.

The Respondent violated a prior Protective Order that expired, or will expire in 30 days or less. A copy of the Order is (check one):  Attached, or

Not available now but will be filed before the hearing on this Application

The Applicant requests a PROTECTIVE ORDER and asks the Court to make all Orders marked with a check ✓

**6 ✓ Orders to Prevent Family Violence**

The Applicant asks the Court to order the Respondent to (Check all that apply):

- a.  Not commit family violence against any person named on page 1 of this form.
- b.  Not communicate in a threatening or harassing manner with any person named on page 1 of this form.
- c.  Not communicate a threat through any person to any person named on page 1 of this form.
- d.  Not communicate or attempt to communicate in any manner with (Check all that apply):
  - Applicant  Children  Other Adults named on page 1 of this form.

The Respondent may communicate through: \_\_\_\_\_ or other person the Court appoints. Good cause exists for prohibiting the Respondent's direct communications.

- e.  Not go within 200 yards of the (Check all that apply):
  - Applicant  Children  Other Adults named on page 1 of this form.
- f.  Not go within 200 yards of the residence, workplace, or school of the (Check all that apply):
  - Applicant  Other Adults named on page 1 of this form.
- g.  Not go within 200 yards of the Children's residence, child-care facility, or school, except as specifically authorized in a possession schedule entered by the Court.
- h.  Not stalk, follow, or engage in conduct directed specifically to anyone named on page 1 of this form that is reasonably likely to harass, annoy, alarm, abuse, torment, or embarrass them, including tracking or monitoring a car or other property.

The Applicant asks the Court to:

- i.  Suspend any license to carry a handgun issued to the Respondent by the State of Texas.
- j.  Require the Respondent to complete a battering intervention and prevention program; or if no such program is available, counseling with a social worker, family service agency, physician, psychologist, licensed therapist, or licensed professional counselor; and pay all costs for the counseling or treatment ordered.
- k.  Prohibit the Respondent from taking, harming, threatening, or interfering with the care, custody, or control of the following pet, companion animal, or assistance animal: \_\_\_\_\_ (describe the animal).
- l.  Require the Respondent to follow these provisions to prevent or reduce the likelihood of family violence:

The law requires a trial court issuing a protective order to prohibit the Respondent from possessing a firearm or ammunition, unless the Respondent is a peace officer actively engaged in employment as a sworn employee of a state agency or political subdivision.

**7  Property Orders**

The Residence located at: 6641 ANNE CT WATAUGA, TX 76148

(Check one):  is jointly owned or leased by the Applicant and Respondent;

- is solely owned or leased by the Applicant; or
- is solely owned or leased by the Respondent; and the Respondent is obligated to support the Applicant or a child in the Applicant's possession.

**The Applicant also asks the Court to make these orders (Check all that apply):**

- The Applicant to have exclusive use of the Residence identified above, and the Respondent must vacate the Residence.
- The sheriff, constable, or chief of police shall provide a law enforcement officer to accompany the Applicant to the Residence, to inform the Respondent that the Court has ordered the Respondent excluded from the Residence, to provide protection while the Applicant takes possession of the Residence and the Respondent removes any necessary personal property, and, if the Respondent refuses to vacate the Residence, to remove the Respondent from the Residence and arrest the Respondent for violating the Court's Order.
- The Applicant to have exclusive use of the following property that the Applicant and Respondent jointly own or lease: 6641 ANNE CT WATAUGA, TX 76148

- The Respondent must not damage, transfer, encumber, or otherwise dispose of any property jointly owned or leased by the parties, except in the ordinary course of business or for reasonable and necessary living expenses, including, but not limited to, removing or disabling any vehicle owned or possessed by the Applicant or jointly owned or possessed by the parties (whether so titled or not).

**8  Spousal Support Order**

The Applicant is married to the Respondent or otherwise legally entitled to support from the Respondent and asks the Court to order the Respondent to pay support in an amount set by the Court.

**9  Orders Related to Removal, Possession, and Support of Children**

The Respondent is a parent of the following of the Applicant's children: M [REDACTED] E [REDACTED] M [REDACTED]

C [REDACTED] R [REDACTED] M [REDACTED]

And, the Applicant asks for these Orders in the best interest of the people named on page 1 of this form.

*Check all that apply:*

- The Respondent must not remove the children from the Applicant's possession or from their child-care facility or school, except as specifically authorized in a possession schedule entered by the Court.
- The Respondent must not remove the children from the jurisdiction of the Court.
- Establish or modify a schedule for the Respondent's possession of the Children, subject to any terms and conditions necessary for the safety of the Applicant or the Children.
- Require the Respondent to pay child support in an amount set by the Court.

**10  Temporary Ex Parte PROTECTIVE ORDER**

Based on the information in the attached Affidavit or Declaration, there is a clear and present danger of family violence that will cause the Applicant, Children, or Other Adults named on page 1 of this form immediate and irreparable injury, loss, and damage, for which there is no adequate remedy at law. Applicant asks the Court to issue a Temporary Ex Parte Protective Order immediately without bond, notice, or hearing.

**11  Ex Parte Order: Vacate Residence Immediately**

The Applicant now lives with the Respondent at: 6641 ANNE CT WATAUGA, TX 76148 or has resided at this Residence within the 30 days prior to filing this Application. The Respondent committed family violence against a member of the household within the 30 days prior to the filing of this Application, as described in the attached Affidavit or Declaration. There is a clear and present danger that the Respondent is likely to commit family violence

against a member of the household. The Applicant is available for a hearing but asks the Court to issue a Temporary Ex Parte Protective Order immediately without bond, notice, or hearing:

- Granting the Applicant exclusive use and possession of the Residence and ordering the Respondent to vacate the Residence immediately, and remain at least 200 yards away from the Residence pending further Order of the Court; and
- Directing the sheriff, constable, or chief of police to provide a law enforcement officer to accompany the Applicant to the Residence, to inform the Respondent that the Court has ordered the Respondent to vacate the Residence, and to provide protection while the Applicant either takes possession of the Residence or removes necessary personal property.

## 12 Keep Information Confidential

The Applicant asks the Court to keep addresses and telephone numbers for residences, workplaces, schools, and childcare facilities confidential. The Applicant asks the Court to order the Court Clerk to strike contact information for Protected People, including: addresses, mailing addresses, county of residence, telephone numbers, places of employment, businesses, child-care facilities, and schools from the public records of the Court, and maintain a confidential record of this information. The Applicants asks the Court to prohibit the Court Clerk from releasing contact information of Protected People except to the Court or to law enforcement for the purpose of entering the information into the Department of Public Safety law enforcement information system. **The Applicant asks the Court to order that all contact information of Protected People be confidential.**

The Applicant asks the Court to order that the following person is designated as a person to receive any notice or documents filed with the Court related to the Application on behalf of the Applicant:

Name: MARGIE WILSON  
 Address: 1640 ANNE CT WATAUGA, TX 76148

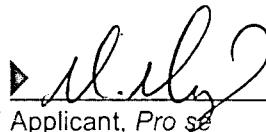
The Applicant asks the Court to order that the Applicant's address is confidential and shall only be disclosed to the Court.

**WARNING:** A copy of this court document will be served to the respondent with any information that you include available for public inspection. Marking the box on number 12 means that you are asking the judge to order the clerk to remove some addresses and telephone numbers from the final order in this case so that the public cannot see them. If you are requesting this, DO NOT INCLUDE this personal information in this form OR a temporary ex parte protective order form.

## 13 Fees And Costs

The Applicant asks the Court to order the Respondent to pay fees for service of process, all other fees and costs of Court, and reasonable attorneys' fees, if applicable.

I have read the entire Application and it is true and correct to the best of my knowledge..



\_\_\_\_\_  
 Applicant, Pro se

Address where Applicant may be contacted: 1641 ANNE CT WATAUGA, TX 76148

Phone # where Applicant may be contacted: (817)940-0852 Fax #: \_\_\_\_\_  
*(List another address/phone if you want yours kept confidential)*



## AFFIDAVIT

Use this form if YOU WANT your Date of Birth  
and Address to REMAIN CONFIDENTIAL.

You will need to have it SIGNED BY A NOTARY.

Do NOT use the Declaration form  
if you use this form.

County of TARRANT

State of Texas

My name is MORGAN MICHELLE MYERS (First Middle Last). I am 31 years old and otherwise competent to make this Affidavit. The information and events described in this Affidavit are true and correct.

1. Describe the most recent time the Respondent hurt you or threatened to hurt you:

TOLD ME I DESERVED TO BE BEAT UP, THAT ANOTHER WOMAN SHOULD COME "KICK MY ASS".

2. In which county did this happen? TARRANT

3. What date did this happen? 12 / 18 / 23

4. Was a weapon involved?  Yes  No

If yes, what kind? \_\_\_\_\_

5. Were any children there?  Yes  No

If yes, who? M [REDACTED] N [REDACTED] C [REDACTED] M [REDACTED]

6. Did anyone call the police?  Yes  No

If yes, what happened? \_\_\_\_\_

7. Did you get medical care?  Yes  No

If yes, describe your injuries: \_\_\_\_\_

Has the Respondent ever threatened or hurt you before? Describe below in detail how the Respondent threatened or hurt you, including date(s) if possible.

MULTIPLE MENTIONS OF "WE JUST NEED TO FUCK" AND OTHER SEXUALLY AGGRESSIVE COMMENTS, LAYING IN BED NAKED WHEN I PREVIOUSLY SAID I DON'T WANT TO SHOW/PARTICIPATE IN ANY PHYSICAL AFFECTION.

9. Were weapons ever involved?  Yes  No If yes, what kind? \_\_\_\_\_

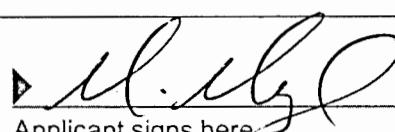
10. Were any children there?  Yes  No If yes, who? M [REDACTED] M [REDACTED] + C [REDACTED] M [REDACTED]

11. Have the police ever been called?  Yes  No

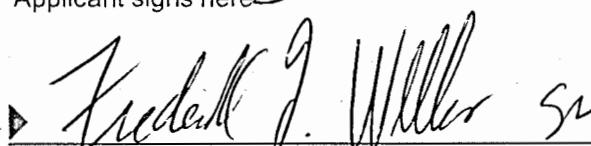
12. Did you ever have to get medical care?  Yes  No If yes, describe your injuries: \_\_\_\_\_

13. Has the Defendant ever been convicted of family violence? Yes

If yes, list when and in which county and state the convictions occurred: \_\_\_\_\_



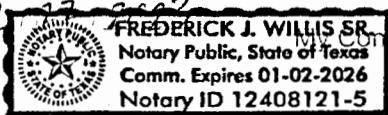
Applicant signs here



Notary Public in and for the State of Texas

On 12 / 22 / 23 the Applicant MORGAN MYERS personally appeared before me, the undersigned notary. After being sworn, the Applicant stated that she/he is qualified to make this oath, that she/he has read the foregoing Application and Affidavit, that she/he has personal knowledge of the facts asserted, and the facts asserted are true and to the best of her/his knowledge and belief. Subscribed and sworn before me on 12 / 22 / 23

Application for Protective Order  
Form Approved by the Supreme Court of Texas



Commission expires: 1-26-2026



A CERTIFIED COPY  
ATTEST: 04/15/2024  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Catherine Saenz

# EXHIBIT 6

DAN  
BRANTHOOVER'S  
INVOLVEMENT  
12.16.23 / 12.19.23



D

Dan Branthroover



Saturday, December 16, 2023

Charlie. I want to make this as clear as I can. You're getting divorced. Please hear that and absorb it. You are getting divorced. I hope I can help with the paperwork and make this go as easy as possible. That's up to you.

★ 8:23 PM

Charlie. The money is in her checking account. Please take some time and speak to an attorney. Get some good solid advice. Have a good evening.

★ 8:24 PM

< +19403123434

5:50 PM, Dec 19

Charlie, it's come to my understanding you have retained an attorney. I'm sure he has told you that all further communication should take place between attorneys. I must formally ask you refrain from discussing details of this case **with my client** moving forward and only communicate with me or your attorney.



+19403123434



8:19 PM

Dec 16, 2023

She transferred money to her own account  
that you said was hers. End of discussion.  
Have a good evening.

8:20 PM

By the way, the money IS hers. Community  
property state.

8:21 PM

6:11 PM

will be in contact with you.  
Dec 19, 2023

You have my name and cell. That's what he needs. Please share the same. (We both know you don't have one).

6:13 PM

It's time to stop playing games. It's time for the lies to stop. You now know the petition is filed. Let's work together and get the decree written up, let's all agree on a few things and let's all move along with our lives.

6:16 PM

I have never lied to you. I have never deceived you. I have told you from day one exactly my plans. Let's all come together and get this done.

6:20 PM

You are a joke. Send that garbage and then block me. Pathetic.

I've enjoyed watching every filing get denied.

One more thing,  
definitions matter.:  
<sup>INTELM</sup>

Client- person under the protection of another

Defense

Be better. Won't be hard.

# EXHIBIT 7

CURRENT  
FACIALLY VOID  
ORDERS

03.14.24

**CAUSE NO. 322-744263-23****IN THE MATTER OF  
THE MARRIAGE OF****AND****AND IN THE INTEREST OF  
[REDACTED] AND [REDACTED]  
[REDACTED], CHILDREN****IN THE DISTRICT COURT****322ND JUDICIAL DISTRICT****TARRANT COUNTY, TEXAS****TEMPORARY ORDERS***IJC*

On February 8, 2024, the Court heard Petitioner's motion for temporary orders.

*Appearances*

Petitioner, [REDACTED], appeared in person and through attorney of record, Cooper L. Carter, and announced ready and signed an Associate Judge's Report regarding Agreed Temporary Orders.

Respondent, [REDACTED], appeared in person and through attorney of record, Daniel Bacalis, and announced ready and signed an Associate Judge's Report regarding Agreed Temporary Orders.

**The parties have agreed to the terms of this order as evidenced by the signatures below.**

*Jurisdiction*

The Court, after examining the record and the agreement of the parties and hearing the evidence and argument of counsel, finds that all necessary prerequisites of the law have been legally satisfied and that the Court has jurisdiction of this case and of all the parties.

*Children*

The following orders are for the safety and welfare and in the best interest of the

following children:

Name: [REDACTED]  
Sex: Female  
Birth date: 7 years  
Home state: Texas

Name: [REDACTED]  
Sex: Female  
Birth date: 5 years  
Home state: Texas

*Conservatorship*

IT IS ORDERED that [REDACTED] and [REDACTED] are appointed Temporary Joint Managing Conservators of the following children: [REDACTED] and [REDACTED]

IT IS ORDERED that, at all times, [REDACTED], as a parent temporary joint managing conservator, shall have the following rights:

1. the right to receive information from any other conservator of the children concerning the health, education, and welfare of the children;
2. the right to confer with the other parent to the extent possible before making a decision concerning the health, education, and welfare of the children;
3. the right of access to medical, dental, psychological, and educational records of the children;
4. the right to consult with a physician, dentist, or psychologist of the children;
5. the right to consult with school officials concerning the children's welfare and educational status, including school activities;
6. the right to attend school activities, including school lunches, performances, and field trips;
7. the right to be designated on the children's records as a person to be notified in case of an emergency;
8. the right to consent to medical, dental, and surgical treatment during an

emergency involving an immediate danger to the health and safety of the children; and

9. the right to manage the estates of the children to the extent the estates have been created by the parent's family or by the parent, other than by the community or joint property of the parent.

IT IS ORDERED that, at all times, [REDACTED], as a parent temporary joint managing conservator, shall have the following rights:

1. the right to receive information from any other conservator of the children concerning the health, education, and welfare of the children;

2. the right to confer with the other parent to the extent possible before making a decision concerning the health, education, and welfare of the children;

3. the right of access to medical, dental, psychological, and educational records of the children;

4. the right to consult with a physician, dentist, or psychologist of the children;

5. the right to consult with school officials concerning the children's welfare and educational status, including school activities;

6. the right to attend school activities, including school lunches, performances, and field trips;

7. the right to be designated on the children's records as a person to be notified in case of an emergency;

8. the right to consent to medical, dental, and surgical treatment during an emergency involving an immediate danger to the health and safety of the children; and

9. the right to manage the estates of the children to the extent the estates have been created by the parent's family or by the parent, other than by the community or joint property of the parent.

IT IS ORDERED that, at all times, [REDACTED] and [REDACTED], as parent temporary joint managing conservators, shall each have the following duties:

1. the duty to inform the other conservator of the children in a timely manner of significant information concerning the health, education, and welfare of the children;

2. the duty to inform the other conservator of the children if the conservator resides with for at least thirty days, marries, or intends to marry a person who the conservator knows is

registered as a sex offender under chapter 62 of the Texas Code of Criminal Procedure or is currently charged with an offense for which on conviction the person would be required to register under that chapter. IT IS ORDERED that notice of this information shall be provided to the other conservator of the children as soon as practicable, but not later than the fortieth day after the date the conservator of the children begins to reside with the person or on the tenth day after the date the marriage occurs, as appropriate. IT IS ORDERED that the notice must include a description of the offense that is the basis of the person's requirement to register as a sex offender or of the offense with which the person is charged. WARNING: A CONSERVATOR COMMITS AN OFFENSE PUNISHABLE AS A CLASS C MISDEMEANOR IF THE CONSERVATOR FAILS TO PROVIDE THIS NOTICE;

3. the duty to inform the other conservator of the children if the conservator establishes a residence with a person who the conservator knows is the subject of a final protective order sought by an individual other than the conservator that is in effect on the date the residence with the person is established. IT IS ORDERED that notice of this information shall be provided to the other conservator of the children as soon as practicable, but not later than the thirtieth day after the date the conservator establishes residence with the person who is the subject of the final protective order. WARNING: A CONSERVATOR COMMITS AN OFFENSE PUNISHABLE AS A CLASS C MISDEMEANOR IF THE CONSERVATOR FAILS TO PROVIDE THIS NOTICE;

4. the duty to inform the other conservator of the children if the conservator resides with, or allows unsupervised access to a child by, a person who is the subject of a final protective order sought by the conservator after the expiration of sixty-day period following the date the final protective order is issued. IT IS ORDERED that notice of this information shall be provided to the other conservator of the children as soon as practicable, but not later than the ninetieth day after the date the final protective order was issued. WARNING: A CONSERVATOR COMMITS AN OFFENSE PUNISHABLE AS A CLASS C MISDEMEANOR IF THE CONSERVATOR FAILS TO PROVIDE THIS NOTICE; and

5. the duty to inform the other conservator of the children if the conservator is the subject of a final protective order issued after the date of the order establishing conservatorship. IT IS ORDERED that notice of this information shall be provided to the other conservator of the children as soon as practicable, but not later than the thirtieth day after the date the final protective order was issued. WARNING: A CONSERVATOR COMMITS AN OFFENSE PUNISHABLE AS A CLASS C MISDEMEANOR IF THE CONSERVATOR FAILS TO PROVIDE THIS NOTICE.

IT IS ORDERED that, during her periods of possession, [REDACTED], as parent temporary joint managing conservator, shall have the following rights and duties:

1. the duty of care, control, protection, and reasonable discipline of the children;
2. the duty to support the children, including providing the children with clothing, food, shelter, and medical and dental care not involving an invasive procedure;

3. the right to consent for the children to medical and dental care not involving an invasive procedure; and

4. the right to direct the moral and religious training of the children.

IT IS ORDERED that, during his periods of possession, [REDACTED], as parent temporary joint managing conservator, shall have the following rights and duties:

1. the duty of care, control, protection, and reasonable discipline of the children;

2. the duty to support the children, including providing the children with clothing, food, shelter, and medical and dental care not involving an invasive procedure;

3. the right to consent for the children to medical and dental care not involving an invasive procedure; and

4. the right to direct the moral and religious training of the children.

IT IS ORDERED that [REDACTED], as a parent temporary joint managing conservator, shall have the following rights and duty:

1. the independent right to consent to medical, dental, and surgical treatment involving invasive procedures;

2. the independent right to consent to psychiatric and psychological treatment of the children;

3. the independent right to receive and give receipt for periodic payments for the support of the children and to hold or disburse these funds for the benefit of the children;

4. the independent right to represent the children in legal action and to make other decisions of substantial legal significance concerning the children;

5. the independent right to consent to marriage and to enlistment in the armed forces of the United States;

6. the independent right to make decisions concerning the children's education;

7. except as provided by section 264.0111 of the Texas Family Code, the independent right to the services and earnings of the children;

8. except when a guardian of the children's estates or a guardian or attorney ad litem has been appointed for the children, the independent right to act as an agent of the children in

relation to the children's estates if the children's action is required by a state, the United States, or a foreign government;

9. the right, subject to the agreement of the other conservator, to apply for passports for the children, to renew the children's passports, and to maintain possession of the children's passports; and

10. the independent duty to manage the estates of the children to the extent the estates have been created by the community or joint property of the parent.

IT IS ORDERED that [REDACTED], as a parent temporary joint managing conservator, shall have the following rights and duty:

1. the independent right to consent to medical, dental, and surgical treatment involving invasive procedures;

2. the independent right to consent to psychiatric and psychological treatment of the children;

3. the independent right to receive and give receipt for periodic payments for the support of the children and to hold or disburse these funds for the benefit of the children;

4. the independent right to represent the children in legal action and to make other decisions of substantial legal significance concerning the children;

5. the independent right to consent to marriage and to enlistment in the armed forces of the United States;

6. the independent right to make decisions concerning the children's education;

7. except as provided by section 264.0111 of the Texas Family Code, the independent right to the services and earnings of the children;

8. except when a guardian of the children's estates or a guardian or attorney ad litem has been appointed for the children, the independent right to act as an agent of the children in relation to the children's estates if the children's action is required by a state, the United States, or a foreign government;

9. the right, subject to the agreement of the other conservator, to apply for passports for the children, to renew the children's passports, and to maintain possession of the children's passports; and

10. the independent duty to manage the estates of the children to the extent the estates have been created by the community or joint property of the parent.

Notwithstanding any provision in this order to the contrary, IT IS ORDERED that MORGAN MYERS shall have the exclusive right to enroll the children in school. Each conservator, during that conservator's period of possession, is ORDERED to ensure the children's attendance in the schools in which [REDACTED] has enrolled the children.

The Court finds that, in accordance with section 153.001 of the Texas Family Code, it is the public policy of Texas to assure that children will have frequent and continuing contact with parents who have shown the ability to act in the best interest of the child; to provide a safe, stable, and nonviolent environment for the child; and to encourage parents to share in the rights and duties of raising their child after the parents have separated or dissolved their marriage. IT IS ORDERED that the primary residence of the children shall be within Tarrant County, Texas, and counties contiguous to Tarrant County, Texas, and the parties shall not remove the children from Tarrant County, Texas, and counties contiguous to Tarrant County, Texas for the purpose of changing the primary residence of the children until this geographic restriction is modified by further order of the court of continuing jurisdiction or by a written agreement that is signed by the parties and filed with that court.

Except as expressly provided otherwise in this temporary order, IT IS ORDERED that all information of which a conservator is required to notify the other conservator and all documents and information that a conservator is required to provide to the other conservator shall be sent in the following manner:

- a. delivery to the recipient at the recipient's electronic mail address as follows or to such other electronic mail address subsequently designated by the recipient:

[REDACTED]

morganm202@gmail.com

[REDACTED] chuckdustic12@gmail.com

and in the event of any change in a recipient's electronic mail address, that recipient is ORDERED to notify the other recipient of such change in writing within twenty-four hours after the change.

If a party applies for a passport for the children, that party, is ORDERED to notify the other party of that fact no later than 10 days after the application.

IT IS ORDERED that if a parent's consent is required for the issuance or renewal of a passport, that parent shall provide that consent in writing no later than ten days after receipt of the consent documents, unless the parent has good cause for withholding that consent.

#### *Possession and Access*

IT IS ORDERED that nothing in this order shall supercede any term of any protective order or condition of bond, probation, or parole.

##### 1. Standard Possession Order

IT IS ORDERED that each conservator shall comply with all terms and conditions of this Standard Possession Order. IT IS ORDERED that this Standard Possession Order is effective immediately and applies to all periods of possession occurring on and after the date the Court signs this Standard Possession Order. IT IS, THEREFORE, ORDERED:

###### (a) Definitions

1. In this Standard Possession Order "school" means the elementary or secondary school in which the child is enrolled or, if the child is not enrolled in an elementary or secondary school, the public school district in which the child primarily resides.

2. In this Standard Possession Order "child" includes each child, whether one or more, who is a subject of this suit while that child is under the age of eighteen years and not otherwise emancipated.

###### (b) Mutual Agreement or Specified Terms for Possession

IT IS ORDERED that the conservators shall have possession of the child at times mutually agreed to in advance by the parties, and, in the absence of

mutual agreement, it is ORDERED that the conservators shall have possession of the child under the specified terms set out in this Standard Possession Order.

(c) When Parents Reside 50 Miles or Less Apart

Except as otherwise expressly provided in this Standard Possession Order, when [REDACTED] resides 50 miles or less from the primary residence of the child, [REDACTED] shall have the right to possession of the child as follows:

1. Weekends –

On weekends that occur during the regular school term, beginning at the time the child's school is regularly dismissed, on the first, third, and fifth Friday of each month and ending at the time the child's school resumes after the weekend.

On weekends that do not occur during the regular school term, beginning at 6:00 P.M., on the first, third, and fifth Friday of each month and ending at 6:00 P.M. on the following Sunday.

2. Weekend Possession Extended by a Holiday –

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by [REDACTED] begins on a student holiday or a teacher in-service day that falls on a Friday during the regular school term, as determined by the school in which the child is enrolled, or a federal, state, or local holiday that falls on a Friday during the summer months when school is not in session, that weekend period of possession shall begin at the time the child's school is regularly dismissed on the Thursday immediately preceding the student holiday or teacher in-service day and 6:00 p.m. on the Thursday immediately preceding the federal, state, or local holiday during the summer months.

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by [REDACTED] ends on or is immediately followed by a student holiday or a teacher in-service day that falls on a Monday during the regular school term, as determined by the school in which the child is enrolled, or a federal, state, or local holiday that falls on a Monday during the summer months when school is not in session, that weekend period of possession shall end at 8:00 a.m. on Tuesday.

3. Thursdays - On Thursday of each week during the regular school term, beginning at the time the child's school is regularly dismissed and ending at the time the child's school resumes on Friday.

4. Spring Vacation in Even-Numbered Years - In even-numbered

years, beginning at the time the child's school is dismissed and ending at 6:00 P.M. on the day before school resumes after that vacation.

5. Extended Summer Possession by [REDACTED]

With Written Notice by April 1 - If [REDACTED] gives [REDACTED] written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, [REDACTED] shall have possession of the child for thirty days beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation in that year, to be exercised in no more than two separate periods of at least seven consecutive days each, as specified in the written notice. These periods of possession shall begin and end at 6:00 P.M. on each applicable day.

Without Written Notice by April 1 - If [REDACTED] does not give [REDACTED] written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, [REDACTED] shall have possession of the child for thirty consecutive days in that year beginning at 6:00 P.M. on July 1 and ending at 6:00 P.M. on July 31.

Notwithstanding the Thursday periods of possession during the regular school term and the weekend periods of possession ORDERED for [REDACTED], it is expressly ORDERED that [REDACTED] shall have a superior right of possession of the child as follows:

1. Spring Vacation in Odd-Numbered Years - In odd-numbered years, beginning at the time the child's school is dismissed and ending at 6:00 P.M. on the day before school resumes after that vacation.

2. Summer Weekend Possession by [REDACTED] - If [REDACTED] gives [REDACTED] written notice by April 15 of a year, [REDACTED] shall have possession of the child on any one weekend beginning at 6:00 P.M. on Friday and ending at 6:00 P.M. on the following Sunday during any one period of the extended summer possession by [REDACTED] in that year, provided that [REDACTED] picks up the child from [REDACTED] and returns the child to that same place and that the weekend so designated does not interfere with Father's Day possession. Not later than the fifteenth day before the Friday that begins the designated weekend, [REDACTED]

[REDACTED] MORGAN MYERS is to pick up and return the child.

3. Extended Summer Possession by [REDACTED] - If [REDACTED] gives [REDACTED] written notice by April 15 of a year or gives [REDACTED] fourteen days' written notice on or after April 16 of a year, [REDACTED] may designate one weekend beginning no

earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation, during which an otherwise scheduled weekend period of possession by [REDACTED] shall not take place in that year, provided that the weekend so designated does not interfere with [REDACTED] period or periods of extended summer possession or with Father's Day possession.

Notwithstanding the weekend and Thursday periods of possession of [REDACTED] and [REDACTED] shall have the right to possession of the child as follows:

1. Christmas Holidays in Even-Numbered Years - In even-numbered years, [REDACTED] shall have the right to possession of the child beginning at the time the child's school is dismissed for the Christmas school vacation and ending at noon on December 28, and [REDACTED] shall have the right to possession of the child beginning at noon on December 28 and ending at 6:00 P.M. on the day before school resumes after that Christmas school vacation.

2. Christmas Holidays in Odd-Numbered Years - In odd-numbered years, [REDACTED] shall have the right to possession of the child beginning at the time the child's school is dismissed for the Christmas school vacation and ending at noon on December 28, and [REDACTED] shall have the right to possession of the child beginning at noon on December 28 and ending at 6:00 P.M. on the day before school resumes after that Christmas school vacation.

3. Thanksgiving in Odd-Numbered Years - In odd-numbered years, [REDACTED] shall have the right to possession of the child beginning at the time the child's school is dismissed before Thanksgiving and ending at 6:00 P.M. on the Sunday following Thanksgiving.

4. Thanksgiving in Even-Numbered Years - In even-numbered years, [REDACTED] shall have the right to possession of the child beginning at the time the child's school is dismissed before Thanksgiving and ending at 6:00 P.M. on the Sunday following Thanksgiving.

5. Child's Birthday - If a parent is not otherwise entitled under this Standard Possession Order to present possession of a child on the child's birthday, that parent shall have possession of the child and the child's minor siblings beginning at 6:00 P.M. and ending at 8:00 P.M. on that day, provided that that parent picks up the child from the other parent's residence and returns the child to that same place.

6. Father's Day - [REDACTED] shall have the right to possession of the child each year, beginning at 6:00 P.M. on the Friday preceding

Father's Day and ending at 8:00 a.m. on the Monday after Father's Day, provided that if [REDACTED] is not otherwise entitled under this Standard Possession Order to present possession of the child, he shall pick up the child from [REDACTED] residence and return the child to that same place.

7. Mother's Day - [REDACTED] shall have the right to possession of the child each year, beginning at the time the child's school is regularly dismissed on the Friday preceding Mother's Day and ending at the time the child's school resumes after Mother's Day, provided that if [REDACTED] not otherwise entitled under this Standard Possession Order to present possession of the child, she shall pick up the child from [REDACTED] residence and return the child to that same place.

(d) When Parents Reside More than 50 Miles but 100 Miles or Less Apart

Except as otherwise expressly provided in this Standard Possession Order, when [REDACTED] resides more than 50 Miles but 100 miles or less from the primary residence of the child, [REDACTED] shall have the right to possession of the child as follows:

1. Weekends –

On weekends that occur during the regular school term, beginning at the time the child's school is regularly dismissed, on the first, third, and fifth Friday of each month and ending at the time the child's school resumes after the weekend.

On weekends that do not occur during the regular school term, beginning at 6:00 P.M., on the first, third, and fifth Friday of each month and ending at 6:00 P.M. on the following Sunday.

2. Weekend Possession Extended by a Holiday –

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by [REDACTED] begins on a student holiday or a teacher in-service day that falls on a Friday during the regular school term, as determined by the school in which the child is enrolled, or a federal, state, or local holiday that falls on a Friday during the summer months when school is not in session, that weekend period of possession shall begin at the time the child's school is regularly dismissed on the Thursday immediately preceding the student holiday or teacher in-service day and 6:00 p.m. on the Thursday immediately preceding the federal, state, or local holiday during the summer months.

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by [REDACTED] ends on or is immediately followed by a student holiday or a teacher in-service day that falls on

a Monday during the regular school term, as determined by the school in which the child is enrolled, that weekend period of possession shall end at 8:00 a.m. on Tuesday.

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by [REDACTED] ends on or is immediately followed by a federal, state, or local holiday that falls on a Monday during the summer months when school is not in session, that weekend period of possession shall end at 6:00 P.M. on that Monday.

3. Thursdays - On Thursday of each week during the regular school term, beginning at the time the child's school is regularly dismissed and ending at the time the child's school resumes on Friday.

4. Spring Vacation in Even-Numbered Years - In even-numbered years, beginning at the time the child's school is dismissed for the school's spring vacation and ending at 6:00 P.M. on the day before school resumes after that vacation.

5. Extended Summer Possession by CHARLES MYERS -

With Written Notice by April 1 - If [REDACTED] gives [REDACTED] [REDACTED] written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, [REDACTED] shall have possession of the child for thirty days beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation in that year, to be exercised in no more than two separate periods of at least seven consecutive days each, as specified in the written notice. These periods of possession shall begin and end at 6:00 P.M. on each applicable day.

Without Written Notice by April 1 - If [REDACTED] does not give [REDACTED] written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, [REDACTED] shall have possession of the child for thirty consecutive days in that year beginning at 6:00 P.M. on July 1 and ending at 6:00 P.M. on July 31.

Notwithstanding the Thursday periods of possession during the regular school term and the weekend periods of possession ORDERED for [REDACTED] [REDACTED] it is expressly ORDERED that [REDACTED] shall have a superior right of possession of the child as follows:

1. Spring Vacation in Odd-Numbered Years - In odd-numbered years, beginning at the time the child's school is dismissed for the school's spring vacation and ending at 6:00 P.M. on the day before school resumes after that vacation.

2. Summer Weekend Possession by [REDACTED] - If [REDACTED] gives [REDACTED] written notice by April 15 of a year, [REDACTED] shall have possession of the child on any one weekend beginning at 6:00 P.M. on Friday and ending at 6:00 P.M. on the following Sunday during any one period of the extended summer possession by [REDACTED] in that year, provided that [REDACTED] picks up the child from [REDACTED] and returns the child to that same place and that the weekend so designated does not interfere with Father's Day possession. Not later than the fifteenth day before the Friday that begins the designated weekend, [REDACTED] must give [REDACTED] written notice of the location at which [REDACTED] is to pick up and return the child.

3. Extended Summer Possession by [REDACTED] - If [REDACTED] gives [REDACTED] written notice by April 15 of a year or gives CHARLES MYERS fourteen days' written notice on or after April 16 of a year, MORGAN MYERS may designate one weekend beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation, during which an otherwise scheduled weekend period of possession by [REDACTED] shall not take place in that year, provided that the weekend so designated does not interfere with [REDACTED] period or periods of extended summer possession or with Father's Day possession.

(e) Parents Who Reside More Than 100 Miles Apart

Except as otherwise expressly provided in this Standard Possession Order, when [REDACTED] resides more than 100 miles from the residence of the child, [REDACTED] shall have the right to possession of the child as follows:

1. Weekends - Unless [REDACTED] elects the alternative period of weekend possession described in the next paragraph, [REDACTED] shall have the right to possession of the child on weekends beginning at 6:00 P.M., on the first, third, and fifth Friday of each month and ending at 6:00 P.M. on the following Sunday.

Alternate Weekend Possession - In lieu of the weekend possession described in the foregoing paragraph, [REDACTED] shall have the right to possession of the child not more than one weekend per month of [REDACTED] choice beginning at 6:00 P.M. on the day school recesses for the weekend and ending at 6:00 P.M. on the day before school resumes after the weekend. [REDACTED] may elect an option for this alternative period of weekend possession by giving written notice to [REDACTED] within ninety days after the parties begin to reside more than 100 miles apart. If [REDACTED] makes this election, [REDACTED] shall give [REDACTED]

fourteen days' written or telephonic notice preceding a designated weekend. The weekends chosen shall not conflict with the provisions regarding Christmas, Thanksgiving, the child's birthday, and Mother's Day possession below.

2. Weekend Possession Extended by a Holiday –

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by [REDACTED] begins on a student holiday or a teacher in-service day that falls on a Friday during the regular school term, as determined by the school in which the child is enrolled, or a federal, state, or local holiday during the summer months when school is not in session, that weekend period of possession shall begin at the time the child's school is regularly dismissed on the Thursday immediately preceding the student holiday or teacher in-service day and 6:00 p.m. on the Thursday immediately preceding the federal, state, or local holiday during the summer months

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by [REDACTED] ends on or is immediately followed by a student holiday or a teacher in-service day that falls on a Monday during the regular school term, as determined by the school in which the child is enrolled, that weekend period of possession shall end at 8:00 a.m. on Tuesday.

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by [REDACTED] ends on or is immediately followed by a federal, state, or local holiday that falls on a Monday during the summer months when school is not in session, that weekend period of possession shall end at 6:00 P.M. on that Monday.

3. Spring Vacation in All Years - Every year, beginning at 6:00 P.M. on the day the child is dismissed from school for the school's spring vacation and ending at 6:00 P.M. on the day before school resumes after that vacation.

4. Extended Summer Possession by [REDACTED] –

With Written Notice by April 1 - If [REDACTED] gives [REDACTED] written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, [REDACTED] shall have possession of the child for forty-two days beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation in that year, to be exercised in no more than two separate periods of at least seven consecutive days each, as specified in the written notice. These periods of possession shall begin and end at 6:00 P.M. on each applicable day.

Without Written Notice by April 1 - If [REDACTED] does not give

[REDACTED] written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, [REDACTED] shall have possession of the child for forty-two consecutive days beginning at 6:00 P.M. on June 15 and ending at 6:00 P.M. on July 27 of that year.

Notwithstanding the weekend periods of possession ORDERED for [REDACTED] it is expressly ORDERED that [REDACTED] shall have a superior right of possession of the child as follows:

1. Summer Weekend Possession by [REDACTED] - If [REDACTED] gives [REDACTED] written notice by April 15 of a year, [REDACTED] shall have possession of the child on any one weekend beginning at 6:00 P.M. on Friday and ending at 6:00 P.M. on the following Sunday during any one period of possession by [REDACTED] during [REDACTED] extended summer possession in that year, provided that if a period of possession by [REDACTED] in that year exceeds thirty days, MORGAN MYERS may have possession of the child under the terms of this provision on any two nonconsecutive weekends during that period and provided that [REDACTED] picks up the child from [REDACTED] and returns the child to that same place and that the weekend so designated does not interfere with Father's Day possession.

2. Extended Summer Possession by [REDACTED] - If [REDACTED] gives [REDACTED] written notice by April 15 of a year, [REDACTED] may designate twenty-one days beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation in that year, to be exercised in no more than two separate periods of at least seven consecutive days each, during which [REDACTED] shall not have possession of the child, provided that the period or periods so designated do not interfere with [REDACTED] period or periods of extended summer possession or with Father's Day possession. These periods of possession shall begin and end at 6:00 P.M. on each applicable day.

(f) Holidays

Notwithstanding the weekend and Thursday periods of possession of [REDACTED] except when [REDACTED] resides fifty miles or less from the primary residence of the child, [REDACTED] and [REDACTED] MYERS shall have the right to possession of the child as follows:

1. Christmas Holidays in Even-Numbered Years - In even-numbered years, [REDACTED] shall have the right to possession of the child beginning at the time the child's school is dismissed for the Christmas school vacation and ending at noon on December 28, and [REDACTED] shall have the right to possession of the child beginning at noon on December 28 and ending

at 6:00 P.M. on the day before school resumes after that Christmas school vacation.

2. Christmas Holidays in Odd-Numbered Years - In odd-numbered years, [REDACTED] shall have the right to possession of the child beginning at the time the child's school is dismissed for the Christmas school vacation and ending at noon on December 28, and [REDACTED] shall have the right to possession of the child beginning at noon on December 28 and ending at 6:00 P.M. on the day before school resumes after that Christmas school vacation.

3. Thanksgiving in Odd-Numbered Years - In odd-numbered years, [REDACTED] shall have the right to possession of the child beginning at the time the child's school is dismissed before Thanksgiving and ending at 6:00 P.M. on the Sunday following Thanksgiving.

4. Thanksgiving in Even-Numbered Years - In even-numbered years, [REDACTED] shall have the right to possession of the child beginning at the time the child's school is dismissed before Thanksgiving and ending at 6:00 P.M. on the Sunday following Thanksgiving.

5. Child's Birthday - If a parent is not otherwise entitled under this Standard Possession Order to present possession of a child on the child's birthday, that parent shall have possession of the child and the child's minor siblings beginning at 6:00 P.M. and ending at 8:00 P.M. on that day, provided that that parent picks up the child from the other parent's residence and returns the child to that same place.

6. Father's Day - [REDACTED] shall have the right to possession of the child each year, beginning at 6:00 P.M. on the Friday preceding Father's Day and ending at 8:00 a.m. on the Monday after Father's Day, provided that if [REDACTED] is not otherwise entitled under this Standard Possession Order to present possession of the child, he shall pick up the child from [REDACTED] residence and return the child to that same place.

7. Mother's Day - [REDACTED] shall have the right to possession of the child each year, beginning at the time the child's school is regularly dismissed on the Friday preceding Mother's Day and ending at the time the child's school resumes after Mother's Day, provided that if [REDACTED] is not otherwise entitled under this Standard Possession Order to present possession of the child, she shall pick up the child from [REDACTED] residence and return the child to that same place.

(g) Undesignated Periods of Possession

[REDACTED] shall have the right of possession of the child at all

other times not specifically designated in this Standard Possession Order for [REDACTED] [REDACTED]

(h) General Terms and Conditions

Except as otherwise expressly provided in this Standard Possession Order, the terms and conditions of possession of the child that apply regardless of the distance between the residence of a parent and the child are as follows:

1. Surrender of Child by [REDACTED] - [REDACTED] is ORDERED to surrender the child to [REDACTED] at the beginning of each period of [REDACTED] possession at the residence of [REDACTED]  
[REDACTED]

If a period of possession by [REDACTED] begins at the time the child's school is regularly dismissed, [REDACTED] is ORDERED to surrender the child to [REDACTED] at the beginning of each such period of possession at the school in which the child is enrolled. If the child is not physically attending school, [REDACTED] shall pick up the child at the residence of [REDACTED] at 6:00 P.M., and [REDACTED] is ORDERED to surrender the child to [REDACTED] at the residence of [REDACTED] at 6:00 P.M. under these circumstances.

2. Surrender of Child by [REDACTED] - [REDACTED] is ORDERED to surrender the child to [REDACTED] at the residence of [REDACTED] at the end of each period of possession.

If a period of possession by [REDACTED] ends at the time the child's school resumes, [REDACTED] is ORDERED to surrender the child to [REDACTED] at the end of each such period of possession at the school in which the child is enrolled or, if the child is not physically attending school, at the residence of [REDACTED] at 6:00 P.M.

3. Surrender of Child by [REDACTED] - [REDACTED] is ORDERED to surrender the child to [REDACTED] if the child is in [REDACTED] MYERS's possession or subject to [REDACTED] control, at the beginning of each period of MORGAN MYERS's exclusive periods of possession, at the place designated in this Standard Possession Order.

4. Return of Child by [REDACTED] - [REDACTED] is ORDERED to return the child to [REDACTED] if [REDACTED] is entitled to possession of the child, at the end of each of [REDACTED] exclusive periods of possession, at the place designated in this Standard Possession Order.

5. Personal Effects - Each conservator is ORDERED to return with

the child the personal effects that the child brought at the beginning of the period of possession.

6. Designation of Competent Adult - Each conservator may designate any competent adult to pick up and return the child, as applicable. IT IS ORDERED that a conservator or a designated competent adult be present when the child is picked up or returned.

7. Inability to Exercise Possession - Each conservator is ORDERED to give notice to the person in possession of the child on each occasion that the conservator will be unable to exercise that conservator's right of possession for any specified period.

8. Written Notice - Written notice, including notice provided by electronic mail or facsimile or as otherwise authorized in this order, shall be deemed to have been timely made if received or, if applicable, postmarked before or at the time that notice is due. Each conservator is ORDERED to notify the other conservator of any change in the conservator's electronic mail address or facsimile number within twenty-four hours after the change.

9. Notice to School and [REDACTED] - If [REDACTED] MYERS's time of possession of the child ends at the time school resumes and for any reason the child is not or will not be returned to school, [REDACTED] shall immediately notify the school and [REDACTED] that the child will not be or has not been returned to school.

This concludes the Standard Possession Order.

2. Duration

The periods of possession ordered above apply to each child the subject of this suit while that child is under the age of eighteen years and not otherwise emancipated.

*Child Support*

IT IS ORDERED that [REDACTED] pay to [REDACTED] for the support of [REDACTED] and [REDACTED] nine hundred seventy-three dollars and nineteen cents (\$973.19) per month, with the first payment being due and payable on April 1, 2024 and a like payment being due and payable on the first day of each month thereafter until further order of this Court.

Withholding from Earnings

IT IS ORDERED that any employer of [REDACTED] shall be ordered to withhold the child support payments ordered in this order from the disposable earnings of [REDACTED] for the support of [REDACTED] and [REDACTED]

IT IS FURTHER ORDERED that all amounts withheld from the disposable earnings of [REDACTED] by the employer and paid in accordance with the order to that employer shall constitute a credit against the child support obligation. Payment of the full amount of child support ordered paid by this order through the means of withholding from earnings shall discharge the child support obligation. If the amount withheld from earnings and credited against the child support obligation is less than 100 percent of the amount ordered to be paid by this order, the balance due remains an obligation of [REDACTED] and it is hereby ORDERED that [REDACTED] pay the balance due directly as specified below.

On this date the Court signed an Income Withholding for Support.

Payment

IT IS ORDERED that all payments shall be made through the state disbursement unit at Texas Child Support Disbursement Unit, P.O. Box 659791, San Antonio, Texas 78265-9791, and thereafter promptly remitted to [REDACTED] for the support of the children. IT IS ORDERED that all payments shall be made payable to the Office of the Attorney General and include the ten-digit Office of the Attorney General case number (if available), the cause number of this suit, [REDACTED] name as the name of the noncustodial parent (NCP), and [REDACTED] name as the name of the custodial parent (CP). Payment options are found on the Office of the Attorney General's website at [www.texasattorneygeneral.gov/cs/payment-options-and-types](http://www.texasattorneygeneral.gov/cs/payment-options-and-types).

IT IS ORDERED that each party shall pay, when due, all fees charged to that party by the state disbursement unit and any other agency statutorily authorized to charge a fee.

Change of Employment

IT IS FURTHER ORDERED that [REDACTED] [REDACTED] shall notify this Court and [REDACTED] [REDACTED] by U.S. certified mail, return receipt requested, of any change of address and of any termination of employment. This notice shall be given no later than seven days after the change of address or the termination of employment. This notice or a subsequent notice shall also provide the current address of [REDACTED] [REDACTED] and the name and address of his current employer, whenever that information becomes available.

Clerk's Duties

IT IS ORDERED that, on the request of a prosecuting attorney, the title IV-D agency, the friend of the Court, a domestic relations office, [REDACTED] [REDACTED] [REDACTED] [REDACTED] or an attorney representing [REDACTED] [REDACTED] or [REDACTED] the clerk of this Court shall cause a certified copy of the Income Withholding for Support to be delivered to any employer.

*Medical and Dental Support*

1. IT IS ORDERED that [REDACTED] [REDACTED] and [REDACTED] [REDACTED] shall each provide additional child support for each child as set out in this order for as long as the Court may order [REDACTED] [REDACTED] and [REDACTED] [REDACTED] to provide support for the child under sections 154.001 and 154.002 of the Texas Family Code. Beginning on the day MORGAN [REDACTED] and [REDACTED] [REDACTED] actual or potential obligation to support a child under sections 154.001 and 154.002 of the Family Code terminates, IT IS ORDERED that [REDACTED] [REDACTED] and [REDACTED] [REDACTED] are discharged from these obligations with respect to that child, except for any failure by a parent to fully comply with these obligations before that date.

IT IS FURTHER ORDERED that the additional child support payments for costs of health and dental insurance ordered below are payable through the state disbursement unit or as directed below and subject to the provisions for withholding from earnings provided above for other child support payments.

2. Definitions -

"Health Insurance" means insurance coverage that provides basic health-care services, including usual physician services, office visits, hospitalization, and laboratory, X-ray, and emergency services, that may be provided through a health maintenance organization or other private or public organization, other than medical assistance under chapter 32 of the Texas Human Resources Code.

"Reasonable cost" means the total cost of health insurance coverage for all children for which [REDACTED] is responsible under a medical support order that does not exceed 9 percent of [REDACTED] annual resources, as described by section 154.062(b) of the Texas Family Code.

"Health-care expenses" include, without limitation, medical, surgical, prescription drug, mental health-care services, dental, eye care, ophthalmological, and orthodontic charges but do not include expenses for travel to and from the provider or for nonprescription medication.

"Health-care expenses that are not reimbursed by insurance" ("unreimbursed expenses") include related copayments and deductibles.

3. Findings on Availability of Health Insurance - Having considered the cost, accessibility, and quality of health insurance coverage available to the parties, the Court finds:

IT IS FURTHER FOUND that the following orders regarding health-care coverage are in the best interest of the children.

4. Provision of Health-Care Coverage –

As Petitioner's child support, [REDACTED] [REDACTED] is ORDERED to obtain Medicaid for the children the subject of this suit, and then maintain health insurance for the children as long as child support is payable for that child. [REDACTED] [REDACTED] is ORDERED –

- a. to provide to each conservator of the children the following information no later than the thirtieth day after she received Medicaid for the children:

- a. [REDACTED] [REDACTED] Social Security number;
  - b. Proof that health insurance has been provided for the children;
  - c. The following information and documents:
    - i. The name of the health insurance carrier;
    - ii. The number of the policy;
    - iii. A copy of the policy;
    - iv. A schedule of benefits;
    - v. A health insurance membership card;
    - vi. Claim forms; and
    - vii. Any other information necessary to submit a claim; and
  - d. To provide each conservator of the children with a copy of any renewals or changes to the health insurance coverage of the children and any additional information regarding health insurance coverage of the children no later than the fifteenth day after [REDACTED]  
[REDACTED] receives or is provided with the renewal, change, or additional information;
  - e. To notify each conservator of the children of any termination or

- lapse of health insurance coverage of the children no later than the fifteenth day after the date of the termination or lapse;
- f. After termination or lapse of health insurance coverage, to notify each conservator of the children of the availability to [REDACTED] [REDACTED] of additional health insurance for the children no later than the fifteenth day after the date the insurance becomes available;
  - g. After termination or lapse of health insurance coverage, to enroll the children in a health insurance plan that is available to [REDACTED] [REDACTED] at a reasonable cost at the next available enrollment period.

Pursuant to section 1504.051 of the Texas Insurance Code, IT IS ORDERED that if [REDACTED] [REDACTED] is eligible for dependent health coverage but fails to apply to obtain coverage for the children, the insurer shall enroll the children on application of [REDACTED] [REDACTED] or others authorized by law.

5. Allocation of Unreimbursed Expenses -

The conservator who incurs a health-care expense on behalf of a child is ORDERED to provide to the other conservator receipts, bills, statements, or explanations of benefits showing the uninsured portion of the health-care expenses within thirty days after the incurring conservator receives them. The nonincurring conservator is ORDERED to pay the non-incurring conservator's percentage of the unreimbursed portion of the health-care expenses either by paying the health-care provider directly or by reimbursing the incurring conservator for any advance payment exceeding the incurring conservator's percentage of the unreimbursed portion of the health-care expenses within thirty days after the nonincurring conservator receives receipts, bills, statements, or explanations of benefits showing the unreimbursed portion of the

health-care expense.

For the Court to hold the nonincurring conservator in civil or criminal contempt for failing to pay the nonincurring conservator's percentage of the unreimbursed portion of a health-care expense, the incurring conservator must prove beyond a reasonable doubt that the nonincurring conservator personally received receipts, bills, statements, or explanations of benefits reflecting the unreimbursed portion of the health-care expense no later than thirty days after the incurring conservator received them. Even if the incurring conservator fails to meet that burden of proof, the Court may award the incurring conservator a judgment in the nature of child support against the nonincurring conservator in the amount of the unreimbursed portion of the heath-care expense the nonincurring conservator was ordered but fail to pay.

6. WARNING - A PARENT ORDERED TO PROVIDE HEALTH INSURANCE OR DENTAL INSURANCE OR TO PAY THE OTHER PARENT ADDITIONAL CHILD SUPPORT FOR THE COST OF HEALTH INSURANCE OR DENTAL INSURANCE WHO FAILS TO DO SO IS LIABLE FOR NECESSARY MEDICAL EXPENSES OF THE CHILDREN, WITHOUT REGARD TO WHETHER THE EXPENSES WOULD HAVE BEEN PAID IF HEALTH INSURANCE OR DENTAL INSURANCE HAD BEEN PROVIDED, AND FOR THE COST OF HEALTH INSURANCE PREMIUMS, DENTAL INSURANCE PREMIUMS, OR CONTRIBUTIONS, IF ANY, PAID ON BEHALF OF THE CHILDREN.

7. Notice to Employer - On this date a Medical Support Notice was signed by the Court. For the purpose of section 1169 of title 29 of the United States Code, the conservator not carrying the health or dental insurance policy is designated the custodial parent and alternate recipient's representative.

*No Termination of Orders on Death of Obligee*

An obligation to pay child support under this order does not terminate on the death of

[REDACTED] but continues as an obligation to [REDACTED] and [REDACTED]  
[REDACTED]

*Other Child Related Provisions*

Required Notices

NOTICE TO ANY PEACE OFFICER OF THE STATE OF TEXAS: YOU MAY USE REASONABLE EFFORTS TO ENFORCE THE TERMS OF CHILD CUSTODY SPECIFIED IN THIS ORDER. A PEACE OFFICER WHO RELIES ON THE TERMS OF A COURT ORDER AND THE OFFICER'S AGENCY ARE ENTITLED TO THE APPLICABLE IMMUNITY AGAINST ANY CLAIM, CIVIL OR OTHERWISE, REGARDING THE OFFICER'S GOOD FAITH ACTS PERFORMED IN THE SCOPE OF THE OFFICER'S DUTIES IN ENFORCING THE TERMS OF THE ORDER THAT RELATE TO CHILD CUSTODY. ANY PERSON WHO KNOWINGLY PRESENTS FOR ENFORCEMENT AN ORDER THAT IS INVALID OR NO LONGER IN EFFECT COMMITS AN OFFENSE THAT MAY BE PUNISHABLE BY CONFINEMENT IN JAIL FOR AS LONG AS TWO YEARS AND A FINE OF AS MUCH AS \$10,000.

THE COURT MAY MODIFY THIS ORDER THAT PROVIDES FOR THE SUPPORT OF A CHILD, IF:

- (1) THE CIRCUMSTANCES OF THE CHILD OR A PERSON AFFECTED BY THE ORDER HAVE MATERIALLY AND SUBSTANTIALLY CHANGED; OR
- (2) IT HAS BEEN THREE YEARS SINCE THE ORDER WAS RENDERED OR LAST MODIFIED AND THE MONTHLY AMOUNT OF THE CHILD SUPPORT AWARD

UNDER THE ORDER DIFFERS BY EITHER 20 PERCENT OR \$100 FROM THE AMOUNT THAT WOULD BE AWARDED IN ACCORDANCE WITH THE CHILD SUPPORT GUIDELINES.

Warnings to Parties

WARNINGS TO PARTIES: FAILURE TO OBEY A COURT ORDER FOR CHILD SUPPORT OR FOR POSSESSION OF OR ACCESS TO A CHILD MAY RESULT IN FURTHER LITIGATION TO ENFORCE THE ORDER, INCLUDING CONTEMPT OF COURT. A FINDING OF CONTEMPT MAY BE PUNISHED BY CONFINEMENT IN JAIL FOR UP TO SIX MONTHS, A FINE OF UP TO \$500 FOR EACH VIOLATION, AND A MONEY JUDGMENT FOR PAYMENT OF ATTORNEY'S FEES AND COURT COSTS.

FAILURE OF A PARTY TO MAKE A CHILD SUPPORT PAYMENT TO THE PLACE AND IN THE MANNER REQUIRED BY A COURT ORDER MAY RESULT IN THE PARTY'S NOT RECEIVING CREDIT FOR MAKING THE PAYMENT.

FAILURE OF A PARTY TO PAY CHILD SUPPORT DOES NOT JUSTIFY DENYING THAT PARTY COURT-ORDERED POSSESSION OF OR ACCESS TO A CHILD. REFUSAL BY A PARTY TO ALLOW POSSESSION OF OR ACCESS TO A CHILD DOES NOT JUSTIFY FAILURE TO PAY COURT-ORDERED CHILD SUPPORT TO THAT PARTY.

*Property and Parties*

The Court finds that the following orders respecting the property and parties are necessary and equitable.

IT IS ORDERED that [REDACTED] shall be responsible for the timely payment of the following:

1. The auto insurance for the vehicle in her possession;
2. the monthly payment for her cell phone;
3. the rent payment for the residence located at 6641 Anns Court, Watauga, Texas beginning after March 30, 2024.

IT IS ORDERED that [REDACTED] shall be responsible for the timely payment of the following:

1. The auto insurance for the 2021 Mazda, the 2023 Mazda, and any other vehicle currently in his possession;
2. the car payments for the 2021 Mazda, the 2023 Mazda, and any other vehicle currently in his possession;
3. the monthly payment for his cell phone;
4. the rent payment for the residence located at 6641 Anns Court, Watauga, Texas for February and March 2024.

IT IS ORDERED that Petitioner have the exclusive and private use and possession of the following property while this case is pending: the personal property and clothing in her possession, the 2007 Mazda motor vehicle currently in her possession, and the residence located at 6641 Anns Court, Watauga, Texas beginning March 30, 2024.

IT IS ORDERED that Respondent have the exclusive and private use and possession of the following property while this case is pending: the personal property and clothing in his possession, the 2021 Mazda motor vehicle, the 2023 Mazda motor vehicle, and the residence located at 6641 Anns Court, Watauga, Texas ONLY until March 20, 2024.

*Co-Parenting Website*

IT IS ORDERED that the parties are to attend "Children in the Middle" part 1 and/or 2

by May 1, 2024, and file a certificate of completion with the Court for their attendance to this co-parenting class.

IT IS FURTHER ORDERED that each party shall be solely liable for their own costs for the attendance of this co-parenting class.

*App Close*

IT IS ORDERED that [REDACTED] and [REDACTED] each shall, within ten days after the entry of the Associate Judge's Report is signed by the Court, obtain at his/her sole expense a subscription to the AppClose program. IT IS FURTHER ORDERED that [REDACTED] and [REDACTED] each shall maintain that subscription in full force and effect for as long as the child is under the age of eighteen years and not otherwise emancipated.

IT IS ORDERED that [REDACTED] and [REDACTED] shall each communicate through the AppClose program with regard to all communication regarding the children, except in the case of emergency or other urgent matter.

IT IS ORDERED that [REDACTED] and [REDACTED] each shall timely post all significant information concerning the health, education, and welfare of the children, including but not limited to the children's medical appointments, the children's schedules and activities, and request for reimbursement of uninsured health-care expenses, on the AppClose website. However, IT IS ORDERED that neither party shall have any obligation to post on that website any information to which the other party already has access through other means, such as information available on the website of the children's schools.

IT IS FURTHER ORDERED that [REDACTED] and [REDACTED] shall each timely post on the AppClose website a copy of any email received by the party from the

children's school or any health-care provider of the children, in the event that email was not also forwarded by the school or health-care provider to the other party.

For purposes of this section of this order, "timely" means on learning of the event or activity, or if not immediately feasible under the circumstances, not later than twenty-four hours after learning of the event or activity.

By agreement, the parties may communicate in any manner other than using the AppClose program, but other methods of communication used by the parties shall be in addition to, and not in lieu of, using the AppClose program.

*Temporary Injunction*

The temporary injunction granted below shall be effective immediately and shall be binding on the parties; on their agents, servants, employees, and attorneys; and on those persons in active concert or participation with them who receive actual notice of this order by personal service or otherwise. The requirement of a bond is waived.

IT IS ORDERED that Petitioner and Respondent are enjoined from:

1. Intentionally communicating with the other party in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging, by use of vulgar, profane, obscene, or indecent language or in a coarse or offensive manner, with intent to annoy or alarm the other party.
2. Threatening the other party in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging, to take unlawful action against any person, intending by this action to annoy or alarm the other party.
3. Placing a telephone call, anonymously, at any unreasonable hour, in an offensive

and repetitious manner, or without a legitimate purpose of communication with the intent to annoy or alarm the other party.

4. Intentionally, knowingly, or recklessly causing bodily injury to the other party or to a child of either party.

5. Threatening the other party or a child of either party with imminent bodily injury.

6. Intentionally, knowingly, or recklessly destroying, removing, concealing, encumbering, transferring, or otherwise harming or reducing the value of the property of one or both of the parties with intent to obstruct the authority of the Court to order a division of the estate of the parties in a manner that the Court deems just and right, having due regard for the rights of each party and the children of the marriage.

7. Intentionally falsifying any writing or record, including an electronic record, relating to the property of either party.

8. Intentionally misrepresenting or refusing to disclose to the other party or to the Court, on proper request, the existence, amount, or location of any tangible or intellectual property of one or both of the parties, including electronically stored or recorded information.

9. Intentionally or knowingly damaging or destroying the tangible or intellectual property of one or both of the parties, including electronically stored or recorded information, and causing pecuniary loss or substantial inconvenience to the other party.

10. Intentionally or knowingly tampering with the tangible or intellectual property of one or both of the parties, including electronically stored or recorded information, and causing pecuniary loss or substantial inconvenience to the other party.

11. Selling, transferring, assigning, mortgaging, encumbering, or in any other manner alienating any of the property of one or both of the parties, whether personal property, real

property, or intellectual property, and whether separate or community property, except as specifically authorized by this order.

12. Incurring any debt, other than legal expenses in connection with this suit, except as specifically authorized by this order.

13. Withdrawing money from any checking or savings account in any financial institution for any purpose, except as specifically authorized by this order.

14. Spending any money in either party's possession or subject to either party's control for any purpose, except as specifically authorized by this order.

15. Withdrawing or borrowing money in any manner for any purpose from any retirement, profit-sharing, pension, death, or other employee benefit plan, employee savings plan, individual retirement account, or Keogh account of either party, except as specifically authorized by this order.

16. Withdrawing, transferring, assigning, encumbering, selling, or in any other manner alienating any funds or assets held in any brokerage account, mutual fund account, or investment account by one or both parties, regardless of whether the funds or assets are community or separate property and whether the accounts are self-managed or managed by a third party, except as specifically authorized by this order.

17. Withdrawing or borrowing in any manner all or any part of the cash surrender value of any life insurance policy on the life of either party or a child of the parties, except as specifically authorized by this order.

18. Entering any safe-deposit box in the name of or subject to the control of one or both of the parties, whether individually or jointly with others.

19. Changing or in any manner altering the beneficiary designation on any life

insurance policy on the life of either party or a child of the parties.

20. Canceling, altering, failing to renew or pay premiums on, or in any manner affecting the level of coverage that existed at the time this suit was filed of, any life, casualty, automobile, or health insurance policy insuring the parties' property or persons including a child of the parties.

21. Opening or diverting mail or email or any other electronic communication addressed to the other party.

22. Signing or endorsing the other party's name on any negotiable instrument, check, or draft, including a tax refund, insurance payment, and dividend, or attempting to negotiate any negotiable instrument payable to the parties or the other party without the personal signature of the other party.

23. Taking any action to terminate or limit credit or charge cards in the name of the parties or the other party, except as specifically authorized in this order.

24. Discontinuing or reducing the withholding for federal income taxes from either party's wages or salary.

25. Destroying, disposing of, or altering any financial records of the parties, including but not limited to a canceled check, deposit slip, and other records from a financial institution, a record of credit purchases or cash advances, a tax return, and a financial statement.

26. Destroying, disposing of, or altering any email, text message, video message, or chat message or other electronic data or electronically stored information relevant to the subject matter of this case, whether stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium.

27. Modifying, changing, or altering the native format or metadata of any electronic

data or electronically stored information relevant to the subject matter of this case, whether stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium.

28. Deleting any data or content from any social network profile used or created by either party or a child of the parties.

29. Using any password or personal identification number to gain access to the other party's email account, bank account, social media account, or any other electronic account.

30. Consuming, use or have in their possession any illegal drug or drugs at any time nor shall they have, at any time, a legal drug or drugs in their possession for which that party does not have a prescription.

31. Neither party shall consume alcohol at least 12 hours prior to their time for possession of the children.

32. Neither party shall consume alcohol during their period of possession with the children.

33. Neither party shall attend one of the children's activities if they have consumed alcohol or they are under the influence of alcohol.

34. Neither party shall leave the children with a person who is consuming alcohol at least 12 hours prior to taking possession of the children or has in their possession an illegal drug(s), including prescription drugs, as a childcare provider.

35. No disparaging remarks in the presence of the children and no discussion of litigation or issues of the case with children.

36. The parties are not to discuss the litigation or issues with the children about the other party. The aforementioned sentence means that neither party shall belittle, talk bad, refer to

the other party using a profane name or names, profanity or curse words.

37. The parties are not to discuss the litigation or issues with the children.

38. Neither party shall discuss what occurred in Court including testimony of any witness or witnesses with the children.

IT IS ORDERED that Petitioner is further enjoined from:

1. Entering, operating, or exercising control over the 2021 Mazda motor vehicle and the 2023 Mazda motor vehicle in the possession of Respondent.

IT IS ORDERED that Respondent is further enjoined from:

1. Excluding Petitioner from the use and enjoyment of the residence located at 6641 Anns Court, Watagua, Texas on or after March 30, 2024;.

2. Entering, operating, or exercising control over the 2007 Mazda motor vehicle in the possession of Petitioner.

IT IS ORDERED that Petitioner is specifically authorized:

To make expenditures and incur indebtedness for reasonable and necessary living expenses for food, clothing, shelter, transportation, and medical care.

To make expenditures and incur indebtedness for reasonable attorney's fees and expenses in connection with this suit.

To make withdrawals from accounts in financial institutions only for the purposes authorized by this order.

IT IS ORDERED that Respondent is specifically authorized:

To make expenditures and incur indebtedness for reasonable and necessary living expenses for food, clothing, shelter, transportation, and medical care.

To make expenditures and incur indebtedness for reasonable attorney's fees and expenses

in connection with this suit.

For purposes of this order, "personal property" includes, but is not limited to, the following:

- a. cash, checks, traveler's checks, and money orders;
- b. funds on deposit in financial accounts with commercial banks, savings banks, and credit unions;
- c. funds and assets held in brokerage, mutual fund, and other investment accounts;
- d. publicly traded stocks, bonds, and other securities;
- e. stock options and restricted stock units;
- f. bonuses;
- g. closely held business interests;
- h. retirement benefits and accounts;
- i. deferred compensation benefits;
- j. insurance policies, annuities, and health savings accounts;
- k. motor vehicles, boats, airplanes, cycles, mobile homes, trailers, and recreational vehicles;
- l. money owed to one or both parties, including notes and expected income tax refunds;
- m. household furniture, furnishings, and fixtures;
- n. electronics and computers;
- o. antiques, artwork, and collections;
- p. sporting goods and firearms;
- q. jewelry and other personal items;

- r. pets and livestock;
- s. club memberships;
- t. travel award benefits and other award accounts;
- u. crops, farm equipment, construction equipment, tools, leases, cemetery lots, gold or silver coins not part of a collection, tax overpayments, loss carry-forward deductions, lottery tickets/winnings, stadium bonds, stadium seat licenses, seat options, season tickets, ranch brands, and business names;
- v. digital assets such as email addresses, social network accounts, Web sites, domain names, digital media such as pictures, music, e-books, movies, and videos, blogs, reward points, digital storefronts, artwork, and data storage accounts;
- w. virtual assets such as virtual pets, avatars, accessories for virtual characters, virtual prizes, virtual real estate, and virtual currency;
- x. safe-deposit boxes and their contents;
- y. storage facilities and their contents; and
- z. contingent assets.

*Duration*

These Temporary Orders shall continue in force until the signing of the Final Decree of Divorce or until further order of this Court.

SIGNED on March 14, 2024.

*[Signature]*  
Associate *[Signature]* JUDGE PRESIDING

APPROVED AS TO FORM ONLY:

MARX ALTMAN & JOHNSON

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By:  

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By: 

Daniel Bacalis  
Attorney for Respondent  
State Bar No. 01487550  
[Email: dbacalis@dbacalis.com](mailto:dbacalis@dbacalis.com)

APPROVED AND CONSENTED TO AS TO BOTH FORM AND SUBSTANCE:

  
[REDACTED] [REDACTED]  
PETITIONER

[REDACTED] [REDACTED]  
RESPONDENT

## Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 85983756

Filing Code Description: No Fee Documents

Filing Description:

Status as of 3/27/2024 7:40 AM CST

Associated Case Party: [REDACTED]

Name	BarNumber	Email	TimestampSubmitted	Status
[REDACTED]		[REDACTED]nw02@gmail.com	3/26/2024 3:19:25 PM	SENT
Cooper L.Carter		coopercarter@majadmin.com	3/26/2024 3:19:25 PM	SENT

Associated Case Party: [REDACTED]

Name	BarNumber	Email	TimestampSubmitted	Status
Daniel Bacalis		service@dbacalis.com	3/26/2024 3:19:25 PM	SENT
Tammy L.Johnson		tjohnson@dbacalis.com	3/26/2024 3:19:25 PM	SENT
Daniel R.Bacalis		dbacalis@dbacalis.com	3/26/2024 3:19:25 PM	SENT
[REDACTED]		chuckdustin12@gmail.com	3/26/2024 3:19:25 PM	SENT

## EXHIBIT 8

# ELDEST CHILD SCHOOL REPORT

## Overall Math Level

Level  
3Meets Grade  
Level

Score of **985** on the Star Math test is based on the difficulty of the questions and the number of correct responses. The scale has a range of 600 - 1400. This score results in a placement in Level 3, which meets the target. It is higher than 70% of students in Grade 3.

## Texas Grade 3 Score Levels

Mara: 985

700 800 900 1000 1100 1200 1300



Did Not Meet Grade Level      Approaches Grade Level      Meets Grade Level      Masters Grade Level

## Domain Scores

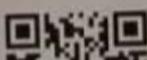
These scores range from 0-100, and represent Mara's estimated percent of mastery at a Grade 3 level.

- █ Beginning: 0-59 percent mastery
- █ Developing: 60-79 percent mastery
- █ Secure: 80-100 percent mastery

Algebra	Score	Data	Score
Algebraic reasoning	67	Data analysis	95
Geometry and Measurement	62	Number and Operations	72
Geometry and measurement		Number and operations	

## Algebra Readiness

Mara is meeting grade level expectations for algebra readiness.



Scan here or go to  
renaissance.com/star/scores to

## EXHIBIT 8.1

Youngest - Untreated  
Cavity



## **Automated Certificate of eService**

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**Envelope ID:** 98573077

**Filing Code Description:** Petition

**Filing Description:** ORIGINAL PETITION FOR SAPCR

**Status as of 3/19/2025 11:21 AM CST**

### **Case Contacts**

Name	BarNumber	Email	TimestampSubmitted	Status
MORGAN MICHELLEMYERS		MORGANMW02@GMAIL.COM	3/18/2025 10:42:43 AM	NOT SENT
COOPER LCARTER		COOPERCARTER@MAJADMIN.COM	3/18/2025 10:42:43 AM	NOT SENT
CHARLES DMYERS		CHUCKDUSTIN12@GMAIL.COM	3/18/2025 10:42:43 AM	NOT SENT