

IN THE 233<sup>RD</sup> DISTRICT COURT OF TARRANT COUNTY, TEXAS

**IN RE: M.E.M., ET AL.**  
**\*\*CHARLES DUSTIN MYERS, \*\***

Petitioner,

**MORGAN MICHELLE MYERS,**

Respondent.

**PETITIONER'S PRE-OBJECTION TO  
MOTION TO TRANSFER**

2025-04-04

**TO THE HONORABLE COURT:**

Petitioner, CHARLES DUSTIN MYERS, PRE-OBJECTS to any motion to transfer filed on behalf of COOPER L. CARTER in this matter, and in support thereof, shows the following:

**I. INTRODUCTION**

1. On March 28, 2025, Petitioner set a properly filed motion to be heard in front of the associate Judge.
2. Petitioner was denied an opportunity to be heard due to the *claim* that COOPER L. CARTER would be filing a motion to consolidate in the 322<sup>nd</sup> District Court of Tarrant County as justification for the denial of due process.
3. On April 2<sup>nd</sup>, 2025, Petitioner filed a PRE-OBJECTION laying out the legal reasons why COOPER L. CARTER's consolidation motion was improper, and premature.
4. COOPER L. CARTER cannot move to consolidate this matter with the divorce suit pending before the 322<sup>nd</sup> District Court because the Texas Family Code 6.407(b) explicitly states:

“On the transfer of the proceedings, the court with jurisdiction of the suit for dissolution of a marriage shall consolidate the two causes of action.”

5. Therefore, COOPER L. CARTER's motion to consolidate is procedurally improper, and was used as a tool to interfere with emergency proceedings where no answer was provided.

6. The court cannot refuse to hear a properly filed motion before it and give deference to an improperly filed motion notwithstanding COOPER L. CARTER's misconduct and failure to prosecute the divorce suit.

## **II. CONCLUSION**

7. For these reasons, Petitioner respectfully OBJECTS to any motion to transfer filed on behalf of COOPER L. CARTER.

8. Furthermore, before any motion to transfer is to be set by COOPER L. CARTER, her authority pursuant to Rule 12 should be resolved by citing COOPER L. CARTER to appear and prove her authority to represent the Respondent in this matter.

Respectfully submitted,

/s/ Charles Dustin Myers  
CHARLES DUSTIN MYERS  
[CHUCKDUSTIN12@GMAIL.COM](mailto:CHUCKDUSTIN12@GMAIL.COM)  
817-546-3693  
PRO-SE

## **CERTIFICATE OF SERVICE**

Pursuant to rule 21a of the Texas Rules of Civil Procedure, this PRE-OBJECTION to motion to transfer was served on all parties of record via their EFM email registered with re:Search Texas on 04/04/2025.

And also to COOPER L. CARTER via [COOPERCARTER@MAJADMIN.COM](mailto:COOPERCARTER@MAJADMIN.COM)

Respectfully submitted,

/s/ Charles Dustin Myers  
CHARLES DUSTIN MERS  
[CHUCKDUSTIN12@GMAIL.COM](mailto:CHUCKDUSTIN12@GMAIL.COM)  
817-546-3693  
PRO-SE

## **Automated Certificate of eService**

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### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
MORGAN MICHELLEMYERS		MORGANMW02@GMAIL.COM	4/4/2025 9:25:44 AM	SENT
CHARLES DMYERS		CHUCKDUSTIN12@GMAIL.COM	4/4/2025 9:25:44 AM	SENT
CHARLES MYERS		chuckdustin12@gmail.com	4/4/2025 9:25:44 AM	SENT
MORGAN MICHELLEMYERS		MORGANMW02@GMAIL.COM	4/4/2025 9:25:44 AM	SENT