

No.25-_____

IN THE
SUPREME COURT OF TEXAS

IN RE: CHARLES DUSTIN MYERS, *RELATOR.*

On Petition for Writ of Mandamus
to the 322nd Judicial District Court, Tarrant County
Cause No. 322-744263-23, Hon. Jeff Kaitcer Presiding
On Mandamus Review from Cause No. 02-25-00166-CV in the
Second District Court of Appeals, Fort Worth, Texas

MANDAMUS RECORD

Respectfully submitted by:

Charles Dustin Myers
chuckdustin12@gmail.com
Tel.: 817-546-3693
6641 Anne Court
Watauga, Texas 76148

AFFIDAVIT VERIFYING MANDAMUS RECORD

| MR# | NAME |
|------------|--|
| 1..... | CASE DOCKET |
| 2..... | ORIGINAL PETITION FOR DIVORCE |
| 3..... | APPLICATION FOR PROTECTIVE ORDER |
| 4..... | DEFENDANT'S ORIGINAL ANSWER |
| 5..... | MOTION TO CONSOLIDATE |
| 6..... | DISTRICT JUDGE'S RENDITION 01/16/2024 |
| 7..... | ASSOCIATE JUDGE'S REPORT 01/22/2024 |
| 8..... | ASSOCIATE JUDGE'S REPORT 02/01/2024 |
| 9..... | AGREED ORDER TO CONSOLIDATE |
| 10..... | AGREED MOT TO W/D COUNSEL AND TERMINATION LETTER |
| 11..... | ORDER ON WITHDRAWAL OF ATTORNEY |
| 12..... | EMERGENCY MOTION TO VACATE |
| 13..... | FIRST CORRESPONDENCE WITH OPPOSING COUNSEL |
| 14..... | NOTICE OF HEARING |
| 15..... | NOTICE AND UNSWORN DECLARATION |

16.....ASSOCIATE JUDGE'S REPORT 03/14/2024

17.....TEMPORARY ORDERS SIGNED 03/14/2024

18.....REQUEST FOR FINDINGS OF FACT & CONCLUSIONS OF LAW

19.....MOTION TO COMPEL DISCOVERY

TRAP 52.7(2) STATEMENT

**Relator certifies that no testimony was adduced, and no
evidence was offered in connection with the matter complained.**

AFFIDAVIT VERIFYING MANDAMUS RECORD

STATE OF TEXAS
COUNTY OF TARRANT

BEFORE ME, the undersigned authority, on this day Charles Dustin Myers personally appeared, who being by me duly sworn, deposed as follows:

"My name is Charles Dustin Myers. I am over the age of eighteen (18) years, of sound mind, fully competent to make this affidavit, and personally acquainted with the facts stated herein.

I hereby verify and swear under oath, pursuant to Texas Rules of Appellate Procedure 52.7, that the attached mandamus record filed and styled *In Re Charles Dustin Myers, Relator*, in the Second Court of Appeals, Fort Worth, Texas, constitutes a true, correct, and complete copy of every material document filed in the underlying proceeding relevant to the relief sought.

All factual statements and attachments contained within this mandamus record are accurate and authentic to the best of my knowledge and belief."

Further, Affiant sayeth not.

/s/ Charles Dustin Myers

/s/ Charles Dustin Myers

Charles Dustin Myers, Affiant
6641 Anne Court
Watauga, Texas 76148
Tel.: 817-546-3693
Email: chuckdustin12@gmail.com

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 04/14/2025

Number of Pages (including notarial certificate): 170

Commonwealth of Virginia

County of Chesterfield

The foregoing instrument was acknowledged before me
on 04/14/2025 by Charles Dustin Myers.



7784241

My commission expires: 10/31/2026

Notarized remotely online using communication technology via Proof.

TAB 1
CASE DOCKET

TARRANT COUNTY DISTRICT CLERK'S OFFICE
ALL TRANSACTIONS FOR A CASE

Page: 1
Date: 11/19/2024
Time: 09:09

Cause Number: 322-744263-23 Date Filed: 12/18/2023
MORGAN MICHELLE MYERS v CHARLES DUSTIN MYERS
S

Cause of Action: DIVORCE WITH CHILDREN
Case Status....: PENDING

| Filemark | Description | Fee | Total |
|----------|--|-----|--------|
| 1 | 12/18/2023 ORIGINAL PETITION FOR DIVORCE | NUI | 401.00 |
| 2 | 12/18/2023 Citation W/SVC-ISSUED ON CHARLES DUSTIN MYERS-On | NUI | 83.00 |
| | 12/18/2023 12/19/2023 | | |
| 3 | 12/18/2023 STATEMENT OF INABILITY TO AFFORD PYMT OF CRT COSTS UI | | 0.00 |
| 4 | 12/18/2023 PRO SE INSTRUCTION SHEET | I | 0.00 |
| 5 | 12/18/2023 REQ FOR UNCONTESTED CASES SLF REPR LITIGANT W/CHIL | I | 0.00 |
| 6 | 12/18/2023 SERVICE REQUEST FORM (COPIES TO DP 12/18/23 VL) | UI | 0.00 |
| 27 | 12/22/2023 *** From 322-744538-23 *** APPLICATION FOR PROTECT | I | 0.00 |
| | 12/22/2023 IVE ORDER | | |
| 28 | 12/22/2023 *** From 322-744538-23 *** COPIES - PAPER OR CONVE | | 0.00 |
| | 12/22/2023 RTED | | |
| 7 | 12/27/2023 COPIES - PAPER OR CONVERTED | N | 9.00 |
| 8 | 12/27/2023 MOTION FOR TRO/TEMP INJUNCTION & TEMP ORDERS | I | 0.00 |
| 29 | 12/27/2023 *** From 322-744538-23 *** ORDER SET HRG FOR 1/15/ | UIM | 0.00 |
| | 12/27/2023 2024 @ 9AM | | |
| 30 | 12/27/2023 *** From 322-744538-23 *** SERVICE REQUEST FORM (T | UI | 0.00 |
| | 12/27/2023 O DP 12/27/23 VL) | | |
| 31 | 12/27/2023 *** From 322-744538-23 *** CITATION, Prot Order W/ | UI | 0.00 |
| | 12/27/2023 SVC-ISSUED ON-On | | |
| | 12/27/2023 12/27/2023 | | |
| 32 | 12/27/2023 *** From 322-744538-23 *** SHOW CAUSE PRO ORD W/SV | UI | 0.00 |
| | 12/27/2023 C-ISSUED ON CHARLES DUSTIN | | |
| | 12/27/2023 MYERS-On 12/27/2023 | | |
| 33 | 12/28/2023 *** From 322-744538-23 *** ORDER SETTING HEARING 1 | UIM | 0.00 |
| | 12/28/2023 /16/24 @ 9:00 AM | | |
| 12 | 12/29/2023 Citation W/SVC Tr# 2 RET EXEC(CHARLES DUSTIN MYERS | UI | 0.00 |
| | 12/29/2023) On 12/27/2023 | | |
| 34 | 01/02/2024 *** From 322-744538-23 *** DEFENDANT'S ANSWER | UI | 0.00 |
| 35 | 01/02/2024 *** From 322-744538-23 *** (ATT) EXHIBIT B | I | 0.00 |
| 36 | 01/02/2024 *** From 322-744538-23 *** (ATT) EXHIBIT A | I | 0.00 |
| 9 | 01/03/2024 MOTION TO CONSOLIDATE | UI | 0.00 |
| 10 | 01/03/2024 (ATT) CASES_BACKGROUND | I | 0.00 |
| 42 | 01/03/2024 *** From 322-744538-23 *** CITATION, Prot Order W/ | UI | 0.00 |
| | 01/03/2024 SVC Tr# 5 RET EXEC(CHARLES | | |
| | 01/03/2024 DUSTIN MYERS) On 12/29/2023 | | |
| 44 | 01/03/2024 *** From 322-744538-23 *** SHOW CAUSE PRO ORD W/SV | UI | 0.00 |
| | 01/03/2024 C Tr# 6 RET EXEC(CHARLES DU | | |
| | 01/03/2024 STIN MYERS) On 12/29/2023 | | |

| | | | |
|--------------------------------|--|-----|-------|
| 11 | 01/04/2024 Adjustment for service fee from # 2 | NA | 0.00 |
| 37 | 01/08/2024 *** From 322-744538-23 *** MOT FOR CONTINUANCE & N UI | | 0.00 |
| 01/08/2024 OH (PROPOSED) | | | |
| 38 | 01/08/2024 *** From 322-744538-23 *** (ATTACHMENT) DOCUMENTAT I | | 0.00 |
| 01/08/2024 ION FOR CONTINUANCE | | | |
| 39 | 01/08/2024 *** From 322-744538-23 *** (ATTACHMENT) EXHIBIT-A I | | 0.00 |
| 40 | 01/08/2024 *** From 322-744538-23 *** (ATTACHMENT) EXHIBIT-B I | | 0.00 |
| 41 | 01/12/2024 *** From 322-744538-23 *** Adjustment for service | | 0.00 |
| 01/12/2024 fee from # 5 | | | |
| 43 | 01/12/2024 *** From 322-744538-23 *** Adjustment for service | | 0.00 |
| 01/12/2024 fee from # 6 | | | |
| 13 | 01/16/2024 RESP'S ORIGINAL COUNTERPETITION FOR DIVORCE | NUI | 80.00 |
| 14 | 01/16/2024 PAYMENT RECEIVED trans #13 | Y | 35.00 |
| 15 | 01/16/2024 PAYMENT PAID TO STATE trans #13 | Y | 45.00 |
| 16 | 01/16/2024 (ATT) COMPREHENSIVE_STATEMENT | I | 0.00 |
| 17 | 01/16/2024 (ATT) UNSWORN DECLARATION - GENERAL (1) | I | 0.00 |
| 18 | 01/16/2024 (ATT) EXHIBIT G - FALSE AND CONTRADICTORY STATEMEN I | | 0.00 |
| 45 | 01/16/2024 *** From 322-744538-23 *** APPEARANCE - MORGAN MIC UI | | 0.00 |
| 01/16/2024 HELLE MYERS | | | |

TARRANT COUNTY DISTRICT CLERK'S OFFICE
ALL TRANSACTIONS FOR A CASE

Page: 2
Date: 11/19/2024
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MORGAN MICHELLE MYERS v CHARLES DUSTIN MYERS
S

Cause of Action: DIVORCE WITH CHILDREN

Case Status....: PENDING

| Filemark | Description | Fee | Total |
|----------|---|-----|-------|
| 46 | 01/16/2024 *** From 322-744538-23 *** APPEARANCE - CHARLES DU UI | | 0.00 |
| | 01/16/2024 STIN MYERS | | |
| 19 | 01/17/2024 JDG'S RENDITION RESET 1/22/24 @9AM (SGD 1/16/2024) UIM | | 0.00 |
| 47 | 01/17/2024 *** From 322-744538-23 *** JDG'S RENDITION 1/22/20 UIM | | 0.00 |
| | 01/17/2024 24 @ 9AM (SGD 1/16/2024) | | |
| 48 | 01/23/2024 *** From 322-744538-23 *** AJ'S REPORT RESET: 2/1/ UIM | | 0.00 |
| | 01/23/2024 24 @ 9:00 AM | | |
| 49 | 01/23/2024 *** From 322-744538-23 *** AJ REPORT SIGNED 1/22/2 | | 0.00 |
| | 01/23/2024 4 | | |
| 20 | 01/31/2024 1ST AMENDED COUNTERPETITION FOR DIVORCE | UI | 0.00 |
| 21 | 01/31/2024 1ST AMENDED PETITION FOR DIVORCE | UI | 0.00 |
| 22 | 02/05/2024 NOTICE OF TERMINATION OF LEGAL COUNSEL - BACALIS | UI | 0.00 |
| 23 | 02/06/2024 AGREED MOTION FOR WITHDRAWAL OF ATTY BACALIS | UI | 0.00 |
| 24 | 02/08/2024 AGREED AJ'S REPORT FOR TEMP ORDS | UIM | 0.00 |
| 25 | 02/08/2024 AGREED ORDER FOR CONSOLIDATION SIGNED 2/1/24 | UIM | 0.00 |
| 26 | 02/08/2024 AJ REPORT SIGNED 2/1/24 | | 0.00 |
| 50 | 02/08/2024 *** From 322-744538-23 *** AGREED ORDER FOR CONSOL UIM | | 0.00 |
| | 02/08/2024 IDATION | | |

| | | |
|----|--|------|
| 51 | 02/09/2024 *** From 322-744538-23 *** ORDER SIGNED 2/1/24 | 0.00 |
| 52 | 02/09/2024 MTN FOR RECONSIDERATION & TO VACATE TEMPORARY ORDS UI | 0.00 |
| 53 | 02/09/2024 EXHIBIT A.1 - TEXT RECORDS AND VISUALIZATIONS I | 0.00 |
| 54 | 02/09/2024 EXHIBIT A.2 - TEXT TO PAPAW I | 0.00 |
| 55 | 02/09/2024 EXHIBIT A.3 - FINANCIAL TRANSACTION I | 0.00 |
| 56 | 02/09/2024 EXHIBIT A.4 - OVERDRAWN ACCOUNT I | 0.00 |
| 57 | 02/09/2024 EXHIBIT A.5 - EVICTION NOTICE TORN I | 0.00 |
| 58 | 02/09/2024 EXHIBIT B.1 - DIVORCE PETITION I | 0.00 |
| 59 | 02/09/2024 EXHIBIT B.2 - DISMISSED EVICTION I | 0.00 |
| 60 | 02/09/2024 EXHIBIT C.1 - FILINGS REGARDING PROTECTIVE ORD I | 0.00 |
| 61 | 02/09/2024 EXHIBIT C.2 - 01.16.2024 RENDITION UNSIGNED I | 0.00 |
| 62 | 02/09/2024 EXHIBIT C.3 - RENDITION FOR JANUARY 22ND, 2024 I | 0.00 |
| 63 | 02/12/2024 ORD FOR W/D OF ATTORNEY BACALIS UIM | 0.00 |
| 64 | 02/12/2024 ORD ON MTN FOR W/D OF COUNSEL SIGNED 2/8/24 | 0.00 |
| 65 | 02/14/2024 RESP ANSWER TO PTNRS 1ST AMENDED PETITION FOR DIVO UI | 0.00 |
| 66 | 02/14/2024 (ATTACH)AMENDED PETITION FOR DIVORCE UI | 0.00 |
| 67 | 02/22/2024 MOTION FOR PRETRIAL SUMMARY JUDGEMENT/(PROP)NOT OF UI | 0.00 |
| 68 | 02/22/2024 HRG | |
| 69 | 02/22/2024 MOTION FOR SUMMARY JUDGEMENT - BRIEF I | 0.00 |
| 70 | 02/22/2024 EXHIBIT A - RESPONDENT SUBMISSIONS I | 0.00 |
| 71 | 02/22/2024 EXHIBIT B - RENDITION 01.16.2024 I | 0.00 |
| 72 | 02/22/2024 EXHIBIT C - CURRENT ORDERS I | 0.00 |
| 73 | 02/22/2024 EXHIBIT D - PROPOSED PARENTING PLAN I | 0.00 |
| 74 | 02/22/2024 (PROP)ORDER ON MOTION FOR PRETRIAL SUMMARY JDGMNT UI | 0.00 |
| 75 | 02/27/2024 NOTICE OF HEARING 3/14/24 @9AM UIM | 0.00 |
| 76 | 02/27/2024 NOTICE OF HEARING SIGNED 2/15/24 | 0.00 |
| 77 | 03/04/2024 NOTICE & UNSWORN DECLARATION UI | 0.00 |
| 78 | 03/04/2024 REQUIRED INITIAL DISCLOSURES UI | 0.00 |
| 79 | 03/14/2024 APPEARANCE - CHARLES DUSTIN MYERS UI | 0.00 |
| 80 | 03/21/2024 PREPARATORY NOTICE FOR JUDICIAL REVIEW UI | 0.00 |
| 81 | 03/22/2024 1ST AMENDED PREPARATORY NOT FOR JUDICIAL REVIEW UI | 0.00 |
| 82 | 03/26/2024 2ND AMENDED PREPARATORY NOT FOR JUDICIAL REVIEW UI | 0.00 |
| 83 | 03/26/2024 (ATTACH)ASSOCIATE JUDGE REPORT 0314 I | 0.00 |
| 84 | 03/26/2024 (ATTACH)DANNY SLADE BURT AFFIDAVIT I | 0.00 |
| 85 | 03/26/2024 (ATTACH)LUZ OBLE AFFIDAVIT I | 0.00 |
| 86 | 03/26/2024 (ATTACH)JOHN VALERA AFFIDAVIT I | 0.00 |
| 87 | 03/26/2024 (ATTACH)BRIANNA GALBO AFFIDAVIT I | 0.00 |
| 88 | 03/26/2024 (ATTACH)CHRISTIAN VROOM AFFIDAVIT I | 0.00 |

TARRANT COUNTY DISTRICT CLERK'S OFFICE
ALL TRANSACTIONS FOR A CASE

Page: 3
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 MORGAN MICHELLE MYERS v CHARLES DUSTIN MYERS
 S

Cause of Action: DIVORCE WITH CHILDREN
 Case Status....: PENDING

| Filemark | Description | Fee | Total |
|----------|---|-----|-------|
| 89 | 03/26/2024 (ATTACH)NICHOLAS MORVAN AFFIDAVIT | I | 0.00 |
| 90 | 03/26/2024 *REQUEST FOR CLERK TO PREPARE RECORD | UI | 0.00 |
| 91 | 03/26/2024 REQUEST FOR FINDINGS OF FACT & CONCLUSTIONS OF LAW | UI | 0.00 |
| 92 | 03/26/2024 TEMPORARY ORDERS | UIM | 0.00 |
| 93 | 03/26/2024 AJ'S REPORT FOR TEMPORARY ORDERS | UIM | 0.00 |
| 96 | 03/26/2024 TEMPORARY ORDER SIGNED ON 03/14/2024 | | 0.00 |
| 97 | 03/26/2024 AJ'S REPORT SIGNED ON 03/14/2024 | | 0.00 |
| 94 | 04/03/2024 NOT OF FILNGG ORIGINAL PROCEEDING/MTN FOR TEMP | UI | 0.00 |
| | 04/03/2024 RELIEF | | |
| 95 | 04/04/2024 NOT OF FILING ORIG PROCEED & MOT FOR TEMP RELIEF | UI | 0.00 |
| | 04/04/2024 PETITION FOR WRIT OF MANDAMUS | | |
| 98 | 04/08/2024 *CT/APPEALS (ORIG PROC) PET/MAND FILED | I | 0.00 |
| 99 | 04/10/2024 *CT APPEALS (ORIG PROC) PET/MAND DENIED | I | 0.00 |
| 100 | 04/15/2024 COPIES - ELECTRONIC (1-10 PAGES) | N | 33.00 |
| 101 | 04/15/2024 PAYMENT RECEIVED trans #100 | Y | 33.00 |
| 102 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 103 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 104 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 105 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 106 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 107 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 108 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 109 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 110 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 111 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 112 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 113 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 114 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 115 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 116 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 117 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 118 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 119 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 120 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 121 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 122 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 123 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 124 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 125 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 126 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 127 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 128 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 129 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 130 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 131 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 132 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 133 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 134 | 04/15/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |

| | | |
|----|--|------|
| 51 | 02/09/2024 *** From 322-744538-23 *** ORDER SIGNED 2/1/24 | 0.00 |
| 52 | 02/09/2024 MTN FOR RECONSIDERATION & TO VACATE TEMPORARY ORDS UI | 0.00 |
| 53 | 02/09/2024 EXHIBIT A.1 - TEXT RECORDS AND VISUALIZATIONS I | 0.00 |
| 54 | 02/09/2024 EXHIBIT A.2 - TEXT TO PAPAW I | 0.00 |
| 55 | 02/09/2024 EXHIBIT A.3 - FINANCIAL TRANSACTION I | 0.00 |
| 56 | 02/09/2024 EXHIBIT A.4 - OVERDRAWN ACCOUNT I | 0.00 |
| 57 | 02/09/2024 EXHIBIT A.5 - EVICTION NOTICE TORN I | 0.00 |
| 58 | 02/09/2024 EXHIBIT B.1 - DIVORCE PETITION I | 0.00 |
| 59 | 02/09/2024 EXHIBIT B.2 - DISMISSED EVICTION I | 0.00 |
| 60 | 02/09/2024 EXHIBIT C.1 - FILINGS REGARDING PROTECTIVE ORD I | 0.00 |
| 61 | 02/09/2024 EXHIBIT C.2 - 01.16.2024 RENDITION UNSIGNED I | 0.00 |
| 62 | 02/09/2024 EXHIBIT C.3 - RENDITION FOR JANUARY 22ND, 2024 I | 0.00 |
| 63 | 02/12/2024 ORD FOR W/D OF ATTORNEY BACALIS UIM | 0.00 |
| 64 | 02/12/2024 ORD ON MTN FOR W/D OF COUNSEL SIGNED 2/8/24 | 0.00 |
| 65 | 02/14/2024 RESP ANSWER TO PTNRS 1ST AMENDED PETITION FOR DIVO UI | 0.00 |
| 66 | 02/14/2024 (ATTACH)AMENDED PETITION FOR DIVORCE UI | 0.00 |
| 67 | 02/22/2024 MOTION FOR PRETRIAL SUMMARY JUDGEMENT/(PROP)NOT OF UI | 0.00 |
| 68 | 02/22/2024 HRG | |
| 69 | 02/22/2024 MOTION FOR SUMMARY JUDGEMENT - BRIEF I | 0.00 |
| 70 | 02/22/2024 EXHIBIT A - RESPONDENT SUBMISSIONS I | 0.00 |
| 71 | 02/22/2024 EXHIBIT B - RENDITION 01.16.2024 I | 0.00 |
| 72 | 02/22/2024 EXHIBIT C - CURRENT ORDERS I | 0.00 |
| 73 | 02/22/2024 EXHIBIT D - PROPOSED PARENTING PLAN I | 0.00 |
| 74 | 02/22/2024 (PROP)ORDER ON MOTION FOR PRETRIAL SUMMARY JDGMNT UI | 0.00 |
| 75 | 02/27/2024 NOTICE OF HEARING 3/14/24 @9AM UIM | 0.00 |
| 76 | 02/27/2024 NOTICE OF HEARING SIGNED 2/15/24 | 0.00 |
| 77 | 03/04/2024 NOTICE & UNSWORN DECLARATION UI | 0.00 |
| 78 | 03/04/2024 REQUIRED INITIAL DISCLOSURES UI | 0.00 |
| 79 | 03/14/2024 APPEARANCE - CHARLES DUSTIN MYERS UI | 0.00 |
| 80 | 03/21/2024 PREPARATORY NOTICE FOR JUDICIAL REVIEW UI | 0.00 |
| 81 | 03/22/2024 1ST AMENDED PREPARATORY NOT FOR JUDICIAL REVIEW UI | 0.00 |
| 82 | 03/26/2024 2ND AMENDED PREPARATORY NOT FOR JUDICIAL REVIEW UI | 0.00 |
| 83 | 03/26/2024 (ATTACH)ASSOCIATE JUDGE REPORT 0314 I | 0.00 |
| 84 | 03/26/2024 (ATTACH)DANNY SLADE BURT AFFIDAVIT I | 0.00 |
| 85 | 03/26/2024 (ATTACH)LUZ OBLE AFFIDAVIT I | 0.00 |
| 86 | 03/26/2024 (ATTACH)JOHN VALERA AFFIDAVIT I | 0.00 |
| 87 | 03/26/2024 (ATTACH)BRIANNA GALBO AFFIDAVIT I | 0.00 |
| 88 | 03/26/2024 (ATTACH)CHRISTIAN VROOM AFFIDAVIT I | 0.00 |

TARRANT COUNTY DISTRICT CLERK'S OFFICE
ALL TRANSACTIONS FOR A CASE

Page: 3
Date: 11/19/2024
Time: 09:09

Cause Number: 322-744263-23 Date Filed: 12/18/2023
 MORGAN MICHELLE MYERS v CHARLES DUSTIN MYERS
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Cause of Action: DIVORCE WITH CHILDREN
 Case Status....: PENDING

| | | | |
|-----|--|---|------|
| 135 | 04/15/2024 PAYMENT RECEIVED trans #134 | Y | 5.00 |
| 136 | 04/15/2024 PAYMENT RECEIVED trans #133 | Y | 5.00 |
| 137 | 04/15/2024 PAYMENT RECEIVED trans #132 | Y | 5.00 |
| 138 | 04/15/2024 PAYMENT RECEIVED trans #131 | Y | 5.00 |
| 139 | 04/15/2024 PAYMENT RECEIVED trans #130 | Y | 5.00 |
| 140 | 04/15/2024 PAYMENT RECEIVED trans #129 | Y | 5.00 |
| 141 | 04/15/2024 PAYMENT RECEIVED trans #128 | Y | 5.00 |
| 142 | 04/15/2024 PAYMENT RECEIVED trans #127 | Y | 5.00 |
| 143 | 04/15/2024 PAYMENT RECEIVED trans #126 | Y | 5.00 |

TARRANT COUNTY DISTRICT CLERK'S OFFICE
ALL TRANSACTIONS FOR A CASE

Page: 4
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| | Filemark | Description | Fee | Total |
|-----|--|-------------|------|-------|
| 144 | 04/15/2024 PAYMENT RECEIVED trans #125 | Y | 5.00 | |
| 145 | 04/15/2024 PAYMENT RECEIVED trans #124 | Y | 5.00 | |
| 146 | 04/15/2024 PAYMENT RECEIVED trans #123 | Y | 5.00 | |
| 147 | 04/15/2024 PAYMENT RECEIVED trans #122 | Y | 5.00 | |
| 148 | 04/15/2024 PAYMENT RECEIVED trans #121 | Y | 5.00 | |
| 149 | 04/15/2024 PAYMENT RECEIVED trans #120 | Y | 5.00 | |
| 150 | 04/15/2024 PAYMENT RECEIVED trans #119 | Y | 5.00 | |
| 151 | 04/15/2024 PAYMENT RECEIVED trans #118 | Y | 5.00 | |
| 152 | 04/15/2024 PAYMENT RECEIVED trans #117 | Y | 5.00 | |
| 153 | 04/15/2024 PAYMENT RECEIVED trans #116 | Y | 5.00 | |
| 154 | 04/15/2024 PAYMENT RECEIVED trans #115 | Y | 5.00 | |
| 155 | 04/15/2024 PAYMENT RECEIVED trans #114 | Y | 5.00 | |
| 156 | 04/15/2024 PAYMENT RECEIVED trans #113 | Y | 5.00 | |
| 157 | 04/15/2024 PAYMENT RECEIVED trans #112 | Y | 5.00 | |
| 158 | 04/15/2024 PAYMENT RECEIVED trans #111 | Y | 5.00 | |
| 159 | 04/15/2024 PAYMENT RECEIVED trans #110 | Y | 5.00 | |
| 160 | 04/15/2024 PAYMENT RECEIVED trans #109 | Y | 5.00 | |
| 161 | 04/15/2024 PAYMENT RECEIVED trans #108 | Y | 5.00 | |
| 162 | 04/15/2024 PAYMENT RECEIVED trans #107 | Y | 5.00 | |
| 163 | 04/15/2024 PAYMENT RECEIVED trans #106 | Y | 5.00 | |
| 164 | 04/15/2024 PAYMENT RECEIVED trans #105 | Y | 5.00 | |
| 165 | 04/15/2024 PAYMENT RECEIVED trans #104 | Y | 5.00 | |
| 166 | 04/15/2024 PAYMENT RECEIVED trans #103 | Y | 5.00 | |
| 167 | 04/15/2024 PAYMENT RECEIVED trans #102 | Y | 5.00 | |
| 168 | 04/15/2024 COPIES - ELECTRONIC (11 PAGES OR MORE) | N | 5.20 | |
| 169 | 04/15/2024 PAYMENT RECEIVED trans #168 | Y | 5.20 | |
| 170 | 04/15/2024 OVERPAYMENT | Y | 1.80 | |
| 171 | 04/16/2024 Refund Request Form-Created on 04/16/2024 | UI | 0.00 | |

| | | | |
|-----|---|---|-------|
| 172 | 04/17/2024 COPIES - ELECTRONIC (1-10 PAGES) | N | 13.00 |
| 173 | 04/17/2024 PAYMENT RECEIVED trans #172 | Y | 13.00 |
| 174 | 04/17/2024 COPIES - ELECTRONIC (11 PAGES OR MORE) | N | 6.10 |
| 175 | 04/17/2024 PAYMENT RECEIVED trans #174 | Y | 6.10 |
| 176 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 177 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 178 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 179 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 180 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 181 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 182 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 183 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 184 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 185 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 186 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 187 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 188 | 04/17/2024 CERTIFY AND SEAL COPY FEE | N | 5.00 |
| 189 | 04/17/2024 PAYMENT RECEIVED trans #188 | Y | 5.00 |
| 190 | 04/17/2024 PAYMENT RECEIVED trans #187 | Y | 5.00 |
| 191 | 04/17/2024 PAYMENT RECEIVED trans #186 | Y | 5.00 |
| 192 | 04/17/2024 PAYMENT RECEIVED trans #185 | Y | 5.00 |
| 193 | 04/17/2024 PAYMENT RECEIVED trans #184 | Y | 5.00 |
| 194 | 04/17/2024 PAYMENT RECEIVED trans #183 | Y | 5.00 |
| 195 | 04/17/2024 PAYMENT RECEIVED trans #182 | Y | 5.00 |
| 196 | 04/17/2024 PAYMENT RECEIVED trans #181 | Y | 5.00 |
| 197 | 04/17/2024 PAYMENT RECEIVED trans #180 | Y | 5.00 |
| 198 | 04/17/2024 PAYMENT RECEIVED trans #179 | Y | 5.00 |
| 199 | 04/17/2024 PAYMENT RECEIVED trans #178 | Y | 5.00 |
| 200 | 04/17/2024 PAYMENT RECEIVED trans #177 | Y | 5.00 |

TARRANT COUNTY DISTRICT CLERK'S OFFICE
ALL TRANSACTIONS FOR A CASE

Page: 5
Date: 11/19/2024
Time: 09:09

Cause Number: 322-744263-23 Date Filed: 12/18/2023
MORGAN MICHELLE MYERS v CHARLES DUSTIN MYERS

S

Cause of Action: DIVORCE WITH CHILDREN
Case Status....: PENDING

| Filemark | Description | Fee | Total |
|----------|--|-----|-------|
| 201 | 04/17/2024 PAYMENT RECEIVED trans #176 | Y | 5.00 |
| 202 | 04/17/2024 OVERPAYMENT | Y | 0.90 |
| 203 | 04/17/2024 Refund Request Form-Created on 04/17/2024 | UI | 0.00 |
| 204 | 04/19/2024 Accounting notification from #203 | | 0.00 |
| 205 | 04/23/2024 ADJ REF PID#100295890047 OVERPAYMENT | YA | -0.90 |
| 206 | 04/24/2024 MOTION FOR PRETRIAL CONFERENCE | UI | 0.00 |
| 207 | 04/24/2024 RESP OBJECTION TO MTN FOR PRETRIAL CONFERENCE | UI | 0.00 |
| 208 | 04/25/2024 *CORRECTED CT APPEALS (ORIG PROC) PET/MAND DENIED | I | 0.00 |

| | | | |
|-----|---|-----|-------|
| 209 | 04/25/2024 *2ND COA ORD (ORIG PROC) MTN/REHEARING DENIED | I | 0.00 |
| 210 | 04/30/2024 NOTICE OF COMPLETION - CHARLES MYERS | UI | 0.00 |
| 211 | 05/02/2024 *2ND COA ORD (ORIG PROC) MTN/REHEARING DENIED | I | 0.00 |
| 212 | 05/13/2024 *POST CARD (SUP/CT) PET/MAND FILED | I | 0.00 |
| 213 | 05/29/2024 Accounting notification from #171 | | 0.00 |
| 214 | 06/04/2024 ADJ REF PID#100295738677 OVERPAYMENT | YA | -1.80 |
| 215 | 06/24/2024 MOTION FOR JOINDER OF PERSON NEED FOR JUST ADJ | UI | 0.00 |
| 216 | 06/28/2024 IV-D INTERVENTION | NUI | 80.00 |
| 217 | 07/01/2024 OBJ TO TITLE IV INTERVENTION | UI | 0.00 |
| 218 | 07/05/2024 SECOND AMENDED COUNTERPETITION FOR DIVORCE | UI | 0.00 |
| 219 | 08/23/2024 AG PAYMENT, for transaction 216, dated 06/28/2024 | Y | 52.80 |
| 220 | 08/30/2024 *POST CARD (SUP/CT) PET/MAND DENIED | I | 0.00 |
| 221 | 09/10/2024 *POST CARD (SUP CT) REHEARING PET/MAND FILED | I | 0.00 |
| 222 | 09/20/2024 RESP'S RULE 12 MOTION TO SHOW AUTHORITY | UI | 0.00 |
| 223 | 09/20/2024 (PROP)ORD ON MTN FOR RULE 12 SHOW AUTHORITY | UI | 0.00 |
| 224 | 09/26/2024 MOTION FOR TEMPORARY ORDERS | UI | 0.00 |
| 225 | 09/26/2024 (PROPOSED) ORD ON MOT FOR TEMP ORDS | UI | 0.00 |
| 226 | 09/27/2024 1ST AMENDED MOT FOR TEMP ORDS | UI | 0.00 |
| 227 | 10/07/2024 JOINT MOTION TO RECUSE | UI | 0.00 |
| 228 | 10/09/2024 ORDER OF REFERRAL SIGNED 10/8/24 | UIM | 0.00 |
| 229 | 10/09/2024 JUDGE'S RULING LETTER SIGNED 10/8/24 | UIM | 0.00 |
| 230 | 10/09/2024 NOTICE | UI | 0.00 |
| 231 | 10/10/2024 OBJECTION | UI | 0.00 |
| 232 | 10/10/2024 AMENDED JUDGE'S RULING LETTER SIGNED 10/9/24 | UIM | 0.00 |
| 233 | 10/10/2024 AMEND ORD OF REFERRAL SIGNED 10-9-24 | UIM | 0.00 |
| 234 | 10/11/2024 ORDER OF REFERRAL SIGNED 10/10/24 | UIM | 0.00 |
| 235 | 10/11/2024 COVER SHEET ORD OF REFERRAL | UIM | 0.00 |
| 236 | 10/18/2024 *POST CARD (SUP CT) MTN/REHEARING DENIED | I | 0.00 |
| 237 | 10/23/2024 ORD SET VIDEO CONF HEARING 10/30/24 @2:30PM | UIM | 0.00 |
| | 10/23/2024 SIGNED 10/21/24 | | |
| 238 | 10/23/2024 EMAIL NOTIFICATION | UI | 0.00 |
| 239 | 10/29/2024 **COPY** ORD OF ASSIGN BY PRESIDING JUDGE W/ATTACH | UIM | 0.00 |
| | 10/29/2024 SIGNED ON 10.28.24 | | |
| 240 | 11/01/2024 ORDER OF ASSIGNMENT BY THE PRESIDING JUDGE | UIM | 0.00 |
| | 11/01/2024 SIGNED 10-28-24 | | |
| 241 | 11/04/2024 PRE TRIAL MOTION IN LIMINE | UI | 0.00 |
| 242 | 11/04/2024 (PROPOSED) ORD ON MOT FOR PRETRIAL MOT IN LIMINE | UI | 0.00 |
| 243 | 11/06/2024 REQ FOR CONFIRMATION OF PROCEDURAL REQUIREMENTS | UI | 0.00 |
| 244 | 11/11/2024 EMAIL FROM COORDINATOR TO PARTIES | UI | 0.00 |
| 245 | 11/11/2024 MOTION TO ENTER JUDGEMENT | UI | 0.00 |
| 246 | 11/11/2024 (PROPOSED) ORDER ON MOTION TO ENTER JUDGEMENT | UI | 0.00 |
| 247 | 11/11/2024 JOINT MOTION TO RECUSE | UI | 0.00 |
| 248 | 11/13/2024 NOTICE OF INTENT TO REMOVE | UI | 0.00 |
| 249 | 11/15/2024 MOTION TO COMPEL DISCOVERY | UI | 0.00 |
| 250 | 11/15/2024 (PROPOSED) ORD ON MOTION TO COMPEL DISCOVERY | UI | 0.00 |
| 251 | 11/19/2024 ORD DENY JOINT MTN TO RECUSE JUDGE MUNFORD & | UIM | 0.00 |
| | 11/19/2024 JUDGE KAITCER SIGNED 11/7/24 | | |

Total Number Of Records Printed: 251

TAB 2
ORIGINAL PETITION FOR
DIVORCE
12.18.24

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:
[REDACTED]

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.

AFFIDAVIT OF INABILITY



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

MR 2.1

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

MR 2.2

4. Dates of Marriage and Separation

My spouse and I got married on or about: July 20th, 2015
Month _____ Day _____ Year _____

We stopped living together as spouses on or about: December 1st, 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] | Ft. Worth | Texas |
| 2. C [REDACTED] M [REDACTED] | [REDACTED] | Ft. Worth | 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

MR 2.3

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

MR 2.4

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:

- 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:

(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:

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.

MR 2.5



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

MR 2.6

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 _____ 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 _____ 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

MR 2.7

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

MR 2.8

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

MR 2.9

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):

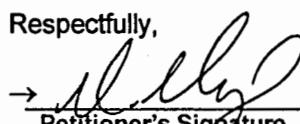
home address, mailing address, employer, work address,
 home phone, work phone, social security no., driver's license #.

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)

Phone

Mailing Address

City

TX
State

Zip

Email Address: moriwi131@gmail.com

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

MR 2.10



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

TAB 3
APPLICATION FOR
PROTECTIVE ORDER
12.22.2024

MR 3

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
 MR. 3.1

Application for Protective Order**1 Parties**

Name:

Applicant: MORGAN MICHELLE MYERS

County of Residence:

TARRANTRespondent: CHARLES DUSTIN MYERSTARRANTRespondent's address for service: [REDACTED]TX [REDACTED]

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] EV [REDACTED] MY [REDACTED] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <u>TARRANT</u> |
| b. C [REDACTED] R [REDACTED] M [REDACTED] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <u>TARRANT</u> |
| c. _____ | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |
| d. _____ | <input type="checkbox"/> Yes <input type="checkbox"/> No | _____ |

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.

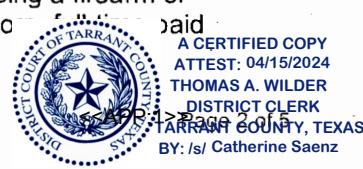
- e. Not go within 200 yards of the (Check all that apply):
 - Applicant Children Other Adults named on page 1 of this form.
- f. Not go within 200 yards of the residence, workplace, or school of the (Check all that apply):
 - Applicant Other Adults named on page 1 of this form.
- g. Not go within 200 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.

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



7 Property Orders

The Residence located at: [REDACTED], TX [REDACTED]

(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:

[REDACTED]

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] A 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: [REDACTED] TX [REDACTED] 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: [REDACTED], TX [REDACTED]

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: [REDACTED], TX [REDACTED]

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] M [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? _____

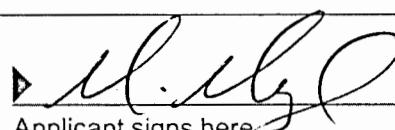
10. Were any children there? Yes No If yes, who? M [REDACTED] M [REDACTED] + C [REDACTED] M [REDACTED]

11. Have the police ever been called? Yes No

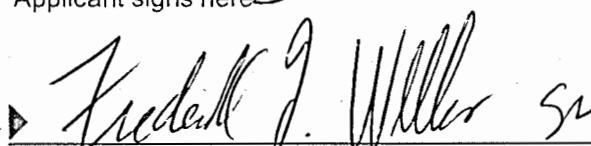
12. Did you ever have to get medical care? Yes No If yes, describe your injuries: _____

13. Has the Defendant ever been convicted of family violence? Yes No

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



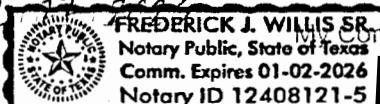
Applicant signs here



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: 1-2026

FREDERICK J. WILLIS SR.

Notary Public, State of Texas

Comm. Expires 01-02-2026

Notary ID 12408121-5



A CERTIFIED COPY

ATTEST: 04/15/2024

THOMAS A. WILDER

DISTRICT CLERK

TARRANT COUNTY, TEXAS

BY: /s/ Catherine Saenz

MR 3.5

County of TARRANT
State of Texas

DECLARATION

Use this form if you want your Date of Birth and Address to be public information (not confidential).

You will NOT need to have it signed by a notary.

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

My name is MORGAN MICHELLE MYERS (First Middle Last), my date of birth is [REDACTED],
and my address is [REDACTED] (Street),
(City), [REDACTED] (State), TX (Zip Code) [REDACTED] (Country) USA.

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

Executed in TARRANT County, State of TX 22ND day of DEC. 2023 (Year).

M. Myers

(Declarant Signature).

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] M [REDACTED] + CA [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:

8. 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 F**K" AND OTHER SEXUALLY AGGRESSIVE COMMENTS, LAYING IN BED NAKED WHEN I PREVIOUSLY SAID I DONT 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] E 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? NO

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

M. Myers
Applicant signs here



TAB 4
DEFENDANTS ORIGINAL
ANSWER
01.02.2024

MR 4

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA.

Cause Number

322-744538-23

(Complete the heading so that it looks exactly like the Petition)

MORGAN MICHELLE MYERS

Plaintiff (Print Full Name)

In the (check one):

322 - PRECINCT 1
Court Number

District Court
 County Court at Law
 Justice Court (JP)

v.

CHARLES DUSTIN MYERS

Defendant (Print Full Name)

TARRANT

County,
Texas

Defendant's Answer

WARNING: Talk to a lawyer before filling out this form. You may accidentally give up important legal rights if you file this form with the Court without first talking to a lawyer. For example, if you file an answer, you may be agreeing that the case can move forward in Texas. For help finding a lawyer, call your local lawyer referral service. If you do not have enough money to hire a lawyer to take your whole case, you can hire a lawyer just to give you advice and help you fill out this form. This is called Limited Scope Representation. You may also be able to talk to a lawyer for free at a legal advice clinic. For help finding a free legal advice clinic go to www.TexasLawHelp.org.

INSTRUCTIONS: If you decide to use this Defendant's Answer form:

- Fill it out completely and sign it.
- File (turn in) your completed answer form at the Courthouse where the Petition was filed.
- It does not cost anything to file an answer.
- If you have been served, you have a limited time to file an answer. Counting from the day you were served, you have 20 days plus the following Monday, at 10 a.m. to file an answer. If you do not file an answer by the deadline, the Plaintiff can ask the court to enter a default judgment against you.
- Keep a copy of your answer for your records.
- Send a copy to the Plaintiff's lawyer or to the Plaintiff if they are not represented by a lawyer.
- Filing an answer usually means you have 30 days to exchange **Required Initial Disclosures**. Read more at www.TexasLawHelp.org.

1. Defendant's Information

My name is **CHARLES DUSTIN MYERS**. I am the Defendant in this Case.
(PRINT your full name.)

The last three numbers of my driver's license number are 6 0 8. 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 9 6 3.

Or I do not have a social security number.

2. General DenialTexas Rules of Civil Procedure Rule 92

I enter a general denial.

I request notice of all hearings in this case.

MR 4.1



3. Specific Pleas Made Under Penalty of Perjury

Read Texas Rules of Civil Procedure Rule 93 for a list of specific pleas that must be verified or made under penalty of perjury. Ask a lawyer which specific pleas apply to your case.

I make the following specific pleas under penalty of perjury:

The Plaintiff, Morgan Michelle Myers, intentionally lied about allegations of family violence to the court, as evidenced by the complete absence of any police reports, medical records, or credible witnesses to corroborate such claims. I assert that my personal history is devoid of any such incidents and my record remains unblemished. Please see attached EXHIBIT B.

These unfounded allegations have caused significant undue stress and threaten the well-being of my children and myself. The claim that I have a history of family violence is categorically false and is maliciously designed to obstruct my parental rights and access to my children.

The timing and nature of these allegations suggest a strategic ploy to influence the outcome of concurrent legal proceedings — specifically, an eviction case and our ongoing divorce. It appears these claims were fabricated to leverage an advantage in these matters, rather than to protect any party from harm.

The Plaintiff also requested for joint conservatorship in the divorce and seeks co-parenting, which directly contradicts this order in and of itself.

In light of these considerations, I plead with the court to dismiss the protective order and to take appropriate measures to prevent further unwarranted interference with my family life and living situation, as my children's best interests remains my priority.

4. Affirmative Defenses

Read Texas Rules of Civil Procedure Rule 94 for a list of affirmative defenses. Ask a lawyer which affirmative defenses apply to your case.

Note: An affirmative defense is an independent reason that the Plaintiff should not win the lawsuit. If an affirmative defense is successful, you could win the lawsuit, even if what the Plaintiff says is true. If you file an answer and do not claim an affirmative defense, you may forever give up that defense.

I claim the affirmative defenses checked below:

- | | | |
|--|---|---|
| <input type="checkbox"/> accord and satisfaction | <input type="checkbox"/> estoppel | <input type="checkbox"/> license |
| <input type="checkbox"/> arbitration and award | <input type="checkbox"/> failure of consideration | <input type="checkbox"/> release |
| <input type="checkbox"/> assumption of risk | <input checked="" type="checkbox"/> fraud | <input type="checkbox"/> res judicata |
| <input type="checkbox"/> contributory negligence | <input checked="" type="checkbox"/> illegality | <input type="checkbox"/> statute of frauds |
| <input type="checkbox"/> discharge in bankruptcy | <input type="checkbox"/> injury to fellow servant | <input type="checkbox"/> statute of limitations |
| <input checked="" type="checkbox"/> duress | <input type="checkbox"/> laches | <input type="checkbox"/> waiver |

I already paid the debt sued for. I paid \$ _____ to _____
on _____ by _____.
(date) (check, cash, etc.)

Write any other details regarding payment of the debt here:

I also claim these additional affirmative defenses:

Abuse of Process: The petitioner has utilized the judicial proceedings as an instrument of malice and personal vendetta, with the primary intent of causing unwarranted harm to my reputation and rights, rather than seeking legitimate redress for a valid legal grievance.

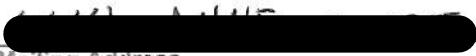
Lack of Evidence: The petitioner has failed to provide any credible evidence, such as police reports, medical documentation to substantiate the allegations of family violence. My record is clear of any such incidents, underscoring the baseless nature

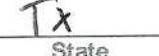
I reserve the right to file an Amended Defendant's Answer with the Court to plead additional verified pleas, affirmative defenses and claims, cross-claims, or third-party claims, as applicable, after further investigation and discovery.

5. Request for Judgment

I ask that Plaintiff take nothing from this lawsuit. I ask for costs of court. I ask for such other and further relief, at law or in equity, to which I may be justly entitled.

Respectfully submitted,


Defendant's Signature
CHARLES DUSTIN MYERS
Defendant's Printed Name

Mailing Address

Phone
 City  State  Zip
Email: CHUCKDUSTIN12@GMAIL.COM  Fax (if available)

I understand that I must let the Court, the Plaintiff's lawyer (or the Plaintiff if the Plaintiff does not have a lawyer), and any other party or lawyer in this case know in writing if my mailing address or email address changes during this case. If I don't, any notices about this case will be sent to me at the mailing address or email address on this form.

6. Unsworn Declaration Made Under Penalty of Perjury

I make this unsworn declaration under penalty of perjury in place of verification as allowed by Texas Civil Practices and Remedies Code Section 132.001.

"Perjury" means making a false statement under oath, which is a crime, so everything in this Answer must be true.

My name is: CHARLES DUSTIN MYERS.
First Middle Last

My date of birth is:  .
Month Day Year

My address is:     USA
Street Address City State Zip Code Country

I declare under penalty of perjury that: 1) I am the Defendant in this case, 2) I have read this Defendant's Answer, and 3) the statements in this Defendant's Answer are within my personal knowledge and are true and correct. I understand that it is a crime to lie on this form.

Formally signed under penalty of perjury in TARRANT County, TEXAS,
on this date: 01 102 2024.
Month Day Year


Defendant's Signature



A CERTIFIED COPY
ATTEST: 04/15/2024

THOMAS A. WILDER
DISTRICT CLERK

TARRANT COUNTY, TEXAS

BY: Is/ Catherine Saenz

Page 3 of 4

7. Certificate of Service

I certify that a copy of this document was delivered to the Plaintiff's lawyer or the Plaintiff (if the Plaintiff does not have a lawyer) on the same day this document was filed with (turned in to) the Court as follows: (Check one.)

- through the electronic file manager if this document is being filed electronically
 by certified mail, return receipt requested
 by fax, to: _____
 by personal delivery
 by email to this email address: MOR6AUMW02@gmail.com


Defendant's Signature

01/02/2024
Date

TAB 5
MOTION TO
CONSOLIDATE

01.03.2024

MR 5

****THIS IS NOT A SUBSTITUTE FOR THE ADVICE OF AN ATTORNEY****

FILED
TARRANT COUNTY
1/3/2024 6:59 PM
THOMAS A. WILDER
DISTRICT CLERK

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

Cause No. 322-744263-23

CHARLES DUSTIN MYERS

[REDACTED]
[REDACTED] TX [REDACTED]

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

AND

Cause No. 322-744538-23

CHARLES DUSTIN MYERS

[REDACTED]
[REDACTED], TX [REDACTED]

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

Motion to Consolidate

Print your answers

My name is:

CHARLES

First

DUSTIN

Middle

MYERS

Last

I am the Petitioner Respondent in this case

In support, the following is shown:

1. These lawsuits involve [a] common question[s] of law or fact.
2. It would serve the convenience of the Court and parties to have these lawsuits consolidated. Consolidation would assist in avoiding repetition, unnecessary expense, and unnecessary delay.

I pray that the Court grant the Motion to Consolidate and consolidate these lawsuits under the older and lower cause number.

Respectfully submitted,



Your Signature

01-03-2024

Date

CHARLES MYERS

Your Printed Name

817-507-6562

Phone

[REDACTED]

Mailing Address

City

Tx

Zip

CHUCKDUSTINV129GMAIL.COM

Email Address

Fax # (if any)

Notice of Hearing

The above motion is set for a hearing on the _____ day of _____, 20_____, at _____ a.m. / p.m.

The hearing will be held in the _____
(Court)
located at _____
(Court's Location)

Signed this _____ day of _____, 20_____.

Judge or Clerk

Certificate of Service

I certify that I delivered a copy of this document to each party in this case, or if a party is represented by a lawyer to the party's lawyer, by: (Check one or more)

Hand delivery to the other party _____

Hand delivery to the other party's lawyer _____

Email to this email address MORGANMWOZG@GMAIL.COM

Regular mail to this address: _____

Certified mail to this address: _____

Commercial delivery service (for example FedEx) to this address: _____

Fax to fax #: _____


Signature

01-03-2024
Date



EXHIBIT A

Background report for case consolidation

MR 5.4

Background Report for Case Consolidation

Case Details:

Divorce Case (Cause No. 322-744263-23) in the 322nd District Court of Tarrant County, filed on December 18, 2023.

Protective Order Case (Cause No. 322-744538-23) in the 322nd District Court of Tarrant County.

Reasons for Consolidation:

Interconnected Issues:

The divorce case and the protective order case involve overlapping issues concerning family violence allegations, which are central to the divorce proceedings and directly affect custody and visitation rights. The protective order case includes allegations of family violence, which are also a pivotal point in the divorce case in determining the waiver of the standard waiting period for the divorce.

Consistency in Rulings:

Consolidating the divorce and protective order cases would ensure consistency in the court's findings, particularly regarding any allegations of family violence and their impact on the dissolution of marriage, custody, and visitation rights.

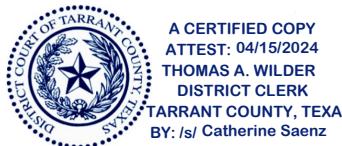
Judicial Economy:

Hearing both cases together would promote judicial economy by avoiding duplication of legal proceedings, as both cases are likely to involve similar witnesses, evidence, and legal arguments.

Claims of False Statements:

There have been claims of false statements and perjury related to the protective order, which could have significant implications for the divorce case. For instance, the claim that the plaintiff intentionally lied about being unable to pay court fees and made false allegations of family violence to gain an advantage in the divorce proceedings suggests that a single judge should hear both matters for a clear understanding of the facts.

MR 5.5



Evidence of Misrepresentation and False Statements:

Evidence provided suggests that there have been misrepresentations to the court, including the transfer of funds from the joint account and the plaintiff's interaction with third parties, which could affect both the protective order and the divorce outcome. The protective order – which was based on claims of family violence – are entirely baseless as I have no record of family violence, and no evidence from the Plaintiff has been provided to substantiate these claims.

Landlord-Tenant Relationship:

The eviction case, although not directly related to family law matters, stems from claims and actions that are deeply intertwined with the divorce and protective order cases, suggesting that the alleged family violence and the actions of the plaintiff have been used to justify an eviction that coincides with the timing of the divorce and protective order filings.

Conclusion:

Given the overlapping factual and legal issues in the divorce and protective order cases, consolidation would serve the interests of justice and efficiency. It would ensure that the court has a comprehensive understanding of the intertwined nature of the family's circumstances, which is vital for fair and equitable resolution of these matters. While the eviction case may not be directly consolidated due to jurisdictional differences, it should be considered in context with the other cases to provide a complete picture of the ongoing disputes and to keep the best interests of our children intact.

Respectfully submitted,

Charles Myers

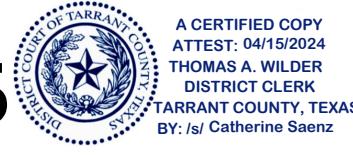
Chuckdustin12@gmail.com

817-507-6562

X 

On this day of 01-03-2024

MR 5.6



TAB 6
DISTRICT JUDGES
RENDITION
01.16.2024

MR 6

322ND FAMILY DISTRICT COURT

~~ASSOCIATE JUDGE'S REPORT~~CAUSE NUMBER: 322 - 744538-23

ITMOTMO/INRE

322 - 744263-23Morgan M. MyersvsCharles D. Myers§
§
§
§

IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

322ND JUDICIAL DISTRICT

RESET DATE AND TIME: January 22, 2024 at 9:00 am

1. Appearances:

- Petitioner/Movant appeared in person and by attorney Pro Se
- Respondent appeared in person and by attorney Pro Se
-

2. Issue(s): Custody Visitation Child Support Health Insurance CPS (Property and Conservatorship)3. Order(s) or Agreement(s): The Wife will remain in the house temporarily. Case is set next Monday, January 22, 2024 at 9:00 am. The husband shall vacate the house by 2:00 p.m. January 16, 2024. Mother to have possession of the children until the time of the hearing. Cause # 322-744538-23 is consolidated into cause # 322-744263-23.
Continuance granted.

AGREED AS TO FORM AND SUBSTANCE:

Attorney for Petitioner_____
Attorney for Respondent_____
Petitioner_____
Respondent

SO ORDERED:

Jenni B. Mutual

322nd Associate Judge

1-16-2024

Date

Rendition

FILED
TARRANT COUNTY
1/17/2024 2:28 PM
THOMAS A. WILDER
DISTRICT CLERK

MR 6.1


 A CERTIFIED COPY
 ATTEST: 04/13/2024
 THOMAS A. WILDER
 DISTRICT CLERK
 TARRANT COUNTY, TEXAS
 BY: /s/ Catherine Saenz

TAB 7
ASSOCIATE JUDGES
REPORT
01.22.24

MR 7

322ND FAMILY DISTRICT COURT

ASSOCIATE JUDGE'S REPORT

CAUSE NUMBER: 322 - 744538-23

FILED
TARRANT COUNTY
1/23/2024 8:14 AM
THOMAS A. WILDER
DISTRICT CLERK

ITMOTMO/INRE

322-744538-23

Morgan Myers
AND
Charles Myers

§
§
§
§

IN THE DISTRICT COURT
TARRANT COUNTY, TEXAS
322ND JUDICIAL DISTRICT

RESET DATE AND TIME: 2/1/2024 at 9:00 A.M.

1. Appearances:

- Petitioner/Movant appeared in person and by attorney Cooper Carter
 Respondent appeared in person and by attorney Dan Becker

2. Issue(s): Custody Visitation Child Support Health Insurance CPSDISPUTE TEMPL. ORDERS & APP. FOR P.O.3. Order(s) or Agreement(s): Motion for Continuance requested
by Petitioner. The court grants continuance
and res-ssets all issues for 2/1/2024
at 9:00 A.M.

RESPONDENT, CHARLES MYERS TO HAVE POSSESSION
OF THE CHILDREN FROM FRIDAY, JAN 26, 2024, 6:00 PM - SATURDAY 1/27/24
RESPONDENT TO PICK UP AND DROP OFF CHILDREN AT
AT 6641 ANNE CT, WATAUGA, TX 6:00 PM

AGREED AS TO FORM AND SUBSTANCE:

Attorney for Petitioner

Petitioner

Attorney for Respondent

Respondent

SO ORDERED:

322nd Associate Judge

1/22/24

Date

MR 7.1



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

Automated Certificate of eService

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Envelope ID: 83674346

Filing Code Description: No Fee Documents

Filing Description:

Status as of 1/24/2024 8:13 AM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------------|-----------|---------------------------|----------------------|--------|
| MORGAN MICHELLEMYERS | | MORGANMW02@GMAIL.COM | 1/23/2024 8:14:14 AM | SENT |
| Cooper Carter | | COOPERCARTER@MAJADMIN.COM | 1/23/2024 8:14:14 AM | SENT |

Associated Case Party: CHARLESDUSTINMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------|-----------|-------------------------|----------------------|--------|
| CHARLES MYERS | | chuckdustin12@gmail.com | 1/23/2024 8:14:14 AM | SENT |
| Daniel Bacalis | | DBACALIS@DBACALIS.COM | 1/23/2024 8:14:14 AM | SENT |

MR 7.2



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

TAB 8
ASSOCIATE JUDGES
REPORT
02.01.2024

MR 8

AGREED

ASSOCIATE JUDGE'S REPORT FOR TEMPORARY ORDERS
(Suit Affecting the Parent-Child Relationship, Property and Debts)

DIVORCE WITH CHILDREN

CAUSE NUMBER: 322-744263-23

| | | |
|----------------------|---|-------------------------------------|
| <u>Morgan Myers</u> | § | IN THE DISTRICT COURT |
| <u>AND</u> | § | TARRANT COUNTY, TEXAS |
| <u>Charles Myers</u> | § | 322 ND JUDICIAL DISTRICT |

RESET DATE: _____

1. Appearances:

Petitioner/Movant appeared in person and by attorney Cooper Carter
 Respondent appeared in person and by attorney Dan Bachis

2. Temporary Conservatorship:

A. Joint Managing Conservators: Primary Possession to Mother Father Other: _____

Mother and Father have the rights and duties under TEX. FAM. CODE ANN. §§ 153.073, 153.074

Other has the rights and duties under TEX. FAM. CODE ANN. §§ 153.073, 153.074

Mother Father Other have the rights, duties and privileges as set forth in TEX. FAM. CODE ANN. § 153.132 except as follows:

The Mother Father Other shall have the exclusive right to establish the residence of the child(ren) and residence of the child(ren) will be Tarrant County or counties contiguous to Tarrant County, TX and/or _____

The Mother Father Other are enjoined from removing the child(ren) from Tarrant County or counties contiguous to Tarrant County, TX for the purpose of establishing the residence of the child(ren) and/or _____

The right to make educational decisions shall be by the Mother Father Other.

The right to make invasive surgical decisions shall be by mutual consent of the parties and failing to agree by the Mother Father Other. The term "invasive" means elective surgical decisions.

The right to receive child support shall be by the Mother Father Other _____

B. Sole Managing Conservator: Mother Father Other: _____

Possessory Conservator: Mother Father Other: _____

Mother Father Other have the rights and duties under TEX. FAM. CODE ANN. §§ 153.073, 153.074

Mother Father and/or Other have the rights, duties and privileges as set forth in TEX. FAM. CODE ANN. § 153.132.

Residency Restriction to Tarrant County Tarrant & contiguous counties.

3. **Temporary Possession Schedule:**

Texas Standard Family Code TEX. FAM. CODE ANN. §§ 153.311 THROUGH 153.316. All possession times begin and end at 6:00 p.m. except for Thursdays which ends at 8:00 p.m.

Texas "Extended" Standard Family Code TEX. FAM. CODE ANN. §§ 153.311 THROUGH 153.316. All possession times begin and end at the time school recesses or begins. Thursdays overnight, during the regular school year.

Other: _____

Mother Father Other shall surrender the child to the other person at the residence of Mother Father Other at the beginning of each period of possession.

Mother Father Other shall surrender the child to the other person at the residence of Mother Father Other at the end of each period of possession.

4. **Temporary Child Support:**

Mother Father shall pay through the Texas State Disbursement Unit, P.O. Box 659791, San Antonio, TX 78265-9791 of \$ 973.19 per month beginning 4-1-2024



Medical Insurance on Child Provided by:

()Mother ()Father

Insurance Cost Paid by:

()Mother ()Father

Uncovered Medical, Dental & Vision Costs:

(Equally) _____

Mother to apply for
MEDICARE

5. Additional Orders: _____

App. for Protective ORDER is non-suited

6. Temporary Spousal Support: *N.A.*

()Wife ()Husband shall pay direct to Spouse \$ _____ per _____ beginning

7. Temporary Possession of Property:

Husband: *2021 MAZDA 3, his personal prop.
& clothing 2023 MAZDA CX-8 (LEASED)*

*REPOSSESS to wife home at 6641 Anne Court
WATAUGA by MARCH 1, 2024*

Wife: *2007 MAZDA, her personal property
& clothing, 6641 Anne Court, WATAUGA,*



8. Temporary Payment of Debts and Bills:

Husband: His living expenses: CAR PAYMENT, his auto ins
his telephone payment.

LEASE PAYMENT FOR HOMESTEAD FOR FEBRUARY
& MARCH 2024

Wife: Her living expenses: her auto INSURANCE, her
telephone payment. LEASE PAYMENT ON HOMESTEAD
AFTER March 30, 2024

9. Temporary Injunctions:

Mutual Temporary Injunctions as to Persons pursuant to the Texas Family Practice Manual.

Mutual Temporary Injunctions as to Property pursuant to the Texas Family Practice Manual.

the parties to communicate through App (Phone)

10. MISCELLANEOUS:

The parties are to attend "Children in the Middle" part 1 and/or 2 by 5/1/24 and to file a certificate with the Court. Each to pay for their own costs.

Neither party shall consume, 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.

Neither party shall consume alcohol at least 12 hours prior to their time for possession of the child(ren).

Neither party shall consume alcohol during their period of possession with the child(ren).

Neither party shall attend one of the child(ren)'s activities if they have consumed alcohol or they are under the influence of alcohol.

Neither party shall leave the child(ren) with a person who is consuming alcohol at least 12 hours prior to taking possession of the child(ren) or has in their possession an illegal drug(s), including prescription drugs, as a childcare provider. No disparaging remarks in the presence of the child(ren) and no discussion of litigation or issues of the case with the child(ren).



The parties are not to discuss the litigation or issues with the child(ren) 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.

The parties are not to discuss the litigation or issues with the child(ren). This paragraph presumes the child(ren) is old enough to communicate with a party. The aforementioned sentence means that neither party shall discuss what occurred in Court including the testimony of any witness or witnesses with the child(ren).

A party is allowed to reasonably offer an age-appropriate statement to discuss the effect of an Order with the child(ren) with a brief statement or sentence. For example, a party is not allowed to show a document to the child(ren) and attempt to comprehensively discuss the case in detail with the child(ren).

A typed written Order conforming to this Report will follow within 20 days from the date this Report is signed. The Temporary Order shall be prepared by Dan Baez.

Each attorney should approve the Order. The parties do not need to approve the Order. The attorney reviewing the proposed Order shall have five (5) days to do so. There are no ten (10) day letters. If an agreement is not reached, a Motion to Sign shall be filed and set within thirty (30) days from the signing of this Report.

AGREED AS TO FORM AND SUBSTANCE

Cory

Attoey for Petitioner

Dan O Baez

Attorney for Respondent

Mrsy

Petitioner

Ch Jr

Respondent

SO, ORDERED:

J

322ND Associate Judge

Date: FEBRUARY 1, 2024



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Envelope ID: 84305097

Filing Code Description: No Fee Documents

Filing Description: AGD AJ REP

Status as of 2/8/2024 3:12 PM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|-----------------|-----------|---------------------------|---------------------|--------|
| Cooper L.Carter | | coopercarter@majadmin.com | 2/8/2024 2:29:20 PM | SENT |

Associated Case Party: CHARLESDUSTINMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|------------------|-----------|-------------------------|---------------------|--------|
| Daniel Bacalis | | service@dbacalis.com | 2/8/2024 2:29:20 PM | SENT |
| Tammy L.Johnson | | tjohnson@dbacalis.com | 2/8/2024 2:29:20 PM | SENT |
| Daniel R.Bacalis | | dbacalis@dbacalis.com | 2/8/2024 2:29:20 PM | SENT |
| CHARLES MYERS | | chuckdustin12@gmail.com | 2/8/2024 2:29:20 PM | SENT |

MR 8.6



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

TAB 9
AGREED ORDER TO
CONSOLIDATE
02.01.2024

MR 9

CAUSE NO. 322-744538-23

FILED
 TARRANT COUNTY
 2/8/2024 2:29 PM
 THOMAS A. WILDER
 DISTRICT CLERK

**IN THE MATTER OF THE
 MARRIAGE OF
 MORGAN MICHELLE MYERS
 AND
 CHARLES DUSTIN MYERS
 AND
 IN THE INTEREST OF
 M [REDACTED] E [REDACTED] M [REDACTED] AND
 C [REDACTED] R [REDACTED] M [REDACTED],
 CHILDREN**

IN THE DISTRICT COURT**322ND JUDICIAL DISTRICT****TARRANT COUNTY, TEXAS**

CAUSE NO. 322-744263-23

**IN THE MATTER OF THE
 MARRIAGE OF
 MORGAN MICHELLE MYERS
 AND
 CHARLES DUSTIN MYERS
 AND
 IN THE INTEREST OF
 M [REDACTED] E [REDACTED] M [REDACTED],
 C [REDACTED] R [REDACTED] M [REDACTED] AND
 M [REDACTED] E [REDACTED] M [REDACTED],
 CHILDREN**

IN THE DISTRICT COURT**322ND JUDICIAL DISTRICT****TARRANT COUNTY, TEXAS****AGREED ORDER FOR CONSOLIDATION**

On January 16, 2024, the Court finds that consolidation of the above causes of action would be in the interest of judicial economy and convenience and that the parties agree to the consolidation. **IT IS ORDERED** that the Motion is **GRANTED**.

IT IS ORDERED that the above causes of action are to be consolidated under cause number 322-744263-23 in the 322ND District Court, TARRANT County, Texas. This is a suit for dissolution of marriage between the parties.



SIGNED on FEBRUARY 1, 2024.

Associate *JUDGE PRESIDING*

APPROVED AS TO FORM ONLY:

Daniel R. Bacalis PC
669 Airport Freeway
Suite 307
Hurst, TX 76053
Office Phone: (817) 498-4105
Fax: (817) 282-0634

/s/ Daniel R. Bacalis

Daniel R. Bacalis
Attorney for CHARLES DUSTIN MYERS
State Bar No: 01487550
Email: dbacalis@dbacalis.com

Max Altman & Johnson
2905 Lackland Road
Fort Worth, Texas 76116
Tel: 817-926-6211

Judge C
Cooper L. Carter
State Bar No: 04121530
cooper.carter@moyadmin.com
Attorney for Morgan Myers

APPROVED AS TO FORM AND CONTENT:

M. Myers
MORGAN MICHELLE MYERS
Pro Se Petitioner

CHARLES DUSTIN MYERS
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: 84305097

Filing Code Description: No Fee Documents

Filing Description: AGD AJ REP

Status as of 2/8/2024 3:12 PM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|-----------------|-----------|---------------------------|---------------------|--------|
| Cooper L.Carter | | coopercarter@majadmin.com | 2/8/2024 2:29:20 PM | SENT |

Associated Case Party: CHARLESDUSTINMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|------------------|-----------|-------------------------|---------------------|--------|
| Daniel Bacalis | | service@dbacalis.com | 2/8/2024 2:29:20 PM | SENT |
| Tammy L.Johnson | | tjohnson@dbacalis.com | 2/8/2024 2:29:20 PM | SENT |
| Daniel R.Bacalis | | dbacalis@dbacalis.com | 2/8/2024 2:29:20 PM | SENT |
| CHARLES MYERS | | chuckdustin12@gmail.com | 2/8/2024 2:29:20 PM | SENT |

MR 9.3



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

TAB 10
AGREED MOTION OF
WITHDRAWAL OF
COUNSEL AND
TERMINATION LETTER
02.05.24

MR 10



FUDSTOP <chuckdustin12@gmail.com>

Termination of Services

1 message

Charlie Vids <chuckdustin12@gmail.com>
To: Daniel Bacalis <dbacalis@dbacalis.com>

Mon, Feb 5, 2024 at 3:09 PM

Dear Mr. Bacalis,

I am writing this letter to formally terminate your services as my legal counsel effective immediately.

This decision has not been easy, and I appreciate the efforts you have put forth in my case so far.

However, after careful consideration, I believe this is the necessary course of action for my family and myself moving forward.

Pursuant to the Texas Disciplinary Rules of Professional Conduct, I am not required to disclose the cause for this decision, however, I have chosen to provide such cause as the reasons listed below:

My primary concern is that recent decisions, including the temporary grant of full custody to Plaintiff while dismissing the protective order outright without pursuing any ramifications do not align with the best interests of my children, and continue to enable the Plaintiffs weaponization of the court system.

I feel strongly that the outcomes so far have not adequately reflected the facts of the case and have been more about appeasing the judicial norms of Family Law and settling with Plaintiff when she has no leverage other than false accusations and concerning behavior including eviction attempts and several knowingly false statements on multiple court documents under penalty of perjury.

Additionally, I am deeply troubled by the impact of these proceedings on my children, my business, and my personal well-being, and how the malicious actions by the Plaintiff have been overlooked by the courts in all aspects, despite timely answers being filed and evidence put forth prior to acquiring your services.

I entered this legal process as a result of the self-destructive nature of the Plaintiff, who has disregarded her children's well-being and has continued to show she is anything but a fit parent throughout these proceedings.

She possesses no means to provide or care for the children, as her intentions are to utilize her family to dismantle everything I've worked and built for my children up to this point.

The temporary orders have already become a huge problem, as Plaintiff showed up to the house two days in a row, without any communication or care for the children. She didn't inquire, call, or even attempt to check how her daughters were doing while in my care, yet claims to be concerned about violence and has sought protective measures for both herself and the children on false allegations.

Please understand, this is not a reflection of your personal character or capabilities. It is a decision I am making based on what I believe to be in the best interest of my children and my family moving forward.

I require representation that aligns more closely with my perspective on these matters and who is prepared to challenge the status quo in court by taking into account all of the facts of the case, and who will put my kids interests first before any assumption or presumption about what may or may not happen, as well as utilize the immense volume of documentation that I have that showcases all points brought up herein and uphold the law in all regards.

Please consider this letter as a formal request to transfer all documents, files, and any other relevant information pertaining to my case at your earliest convenience and notify all relevant parties.

Your prompt action in this matter would be greatly appreciated.

Thank you for your service up to this point. I wish you the best in your future endeavors.

Respectfully,

MR 10.1

IN THE 322ND DISTRICT COURT OF TARRANT COUNTY

MORGAN MICHELLE MYERS,

Plaintiff,

v.

CHARLES DUSTIN MYERS,

Respondent.

Cause Number: 322-744538-23

NOTICE OF TERMINATION OF LEGAL COUNSEL

TO THE CLERK OF THE COURT AND ALL PARTIES OF INTEREST:

Please take notice that I, Charles Dustin Myers, the Respondent in the above-captioned matter, have terminated the legal services of Mr. Daniel R. Bacalis as my counsel of record, as communicated with Mr. Bacalis on 02/05/2024 at 3:09 P.M. CST via e-mail communications.

This notice is filed pursuant to the applicable rules and regulations governing legal representation and is intended to ensure no delay in the proceedings due to this change.

I will represent myself pro se until further notice. If I retain new legal counsel, a notice of appearance will be filed accordingly.

Kindly update the court records to reflect this change and direct all future correspondence related to this case to my attention via the contact method of preference listed below.

This notification is provided directly to the court due to the time-sensitive nature of the ongoing matters in this case.

I will ensure all future correspondence and legal documents are filed in accordance with local court rules and within the set deadlines.

Should there be any required actions or additional information needed from my end, please do not hesitate to contact me directly.

Respectfully submitted,

/s/ CHARLES DUSTIN MYERS

CHARLES DUSTIN MYERS

6641 Anne Court

Watauga, Tx 76148

817-507-6562

chuckdustin12@gmail.com

MR 10.2



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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Termination of Legal Counsel has been furnished to all counsel of record on this 5th day of February, 2024 via e-mail.

/s/ CHARLES DUSTIN MYERS

CHARLES DUSTIN MYERS

[REDACTED]

[REDACTED], Tx [REDACTED]

817-507-6562

chuckdustin12@gmail.com

MR 10.3



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

CAUSE NO. 322-744263-23

FILED
 TARRANT COUNTY
 2/6/2024 4:28 PM
 THOMAS A. WILDER
 DISTRICT CLERK

**IN THE MATTER OF THE
MARRIAGE OF**

**MORGAN MICHELLE MYERS
AND
CHARLES DUSTIN MYERS**

AND IN THE INTEREST OF
 [REDACTED] AND
 [REDACTED]
CHILDREN

§ IN THE DISTRICT COURT
 §
 §
 §
 § **322ND JUDICIAL DISTRICT**
 §
 §
 §
 § **TARRANT COUNTY, TEXAS**

AGREED MOTION FOR WITHDRAWAL OF ATTORNEY

Pursuant to Rule 10 of the Texas Rules of Civil Procedure, Daniel R. Bacalis on behalf of CHARLES DUSTIN MYERS files this Agreed Motion for Withdrawal of Attorney as attorney in charge for CHARLES DUSTIN MYERS, Respondent, and states as follows:

1. This is a suit for dissolution of marriage between the parties and affecting the parent-child relationship.
2. Discovery is being conducted under Level 2.
3. The following are children subject to the suit, and their ages are as follows:

| <u>Name</u> | <u>Age</u> |
|--------------|------------|
| [REDACTED] M | 7 years |
| [REDACTED] R | 5 years |

4. Daniel R. Bacalis, attorney in charge for CHARLES DUSTIN MYERS, the Respondent, petitions this Court to withdraw as the attorney for CHARLES DUSTIN MYERS, and in support of this Motion, Daniel R. Bacalis shows the Court:

5. CHARLES DUSTIN MYERS has agreed and consented to this Motion.

AGREED MOTION FOR WITHDRAWAL OF ATTORNEY - Page 1 of 3
 L:\Documents\Clients\MYERS, CHARLES\Motion for Withdrawal of Attorney - 2-5-24.docx

MR 10.4



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

6. CHARLES DUSTIN MYERS has been delivered a copy of this Motion, and has been notified in writing of the right to object to this Motion. The last known address for CHARLES DUSTIN MYERS is [REDACTED], TX [REDACTED].

7. This request for withdrawal is not sought for delay only.
8. There are no pending settings or deadlines in this case.
9. Daniel R. Bacalis petitions this Court to grant this Motion for Withdrawal of Attorney and remove Daniel R. Bacalis as attorney of record and attorney in charge for CHARLES DUSTIN MYERS and for general relief.

Respectfully submitted,

Daniel R. Bacalis PC
669 Airport Freeway
Suite 307
Hurst, TX 76053
Office Phone: (817) 498-4105
Fax: (817) 282-0634

/s/ Daniel R. Bacalis

Daniel R. Bacalis
Attorney for CHARLES DUSTIN MYERS
State Bar No: 01487550
Email: dbacalis@dbacalis.com

AGREED MOTION FOR WITHDRAWAL OF ATTORNEY - Page 2 of 3

L:\Documents\Clients\MYERS, CHARLES\Motion for Withdrawal of Attorney - 2-5-24.docx

MR 10.5



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

Certificate of Service

I certify that a true copy of this document was served in accordance with Rule 21a of the Texas Rules of Civil Procedure on the following on February 6, 2024.

Cooper L. Carter by electronic filing manager at cooper.carter@majadmin.com.

/s/ Daniel R. Bacalis
Daniel R. Bacalis
Attorney for CHARLES DUSTIN MYERS

AGREED:

/s/ Charles Dustin Myers
CHARLES DUSTIN MYERS

AGREED MOTION FOR WITHDRAWAL OF ATTORNEY - Page 3 of 3
L:\Documents\Clients\MYERS, CHARLES\Motion for Withdrawal of Attorney - 2-5-24.docx

MR 10.6



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

Automated Certificate of eService

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Lindsey McNabb on behalf of Daniel Bacalis

Bar No. 1487550

lmcnabb@dbacalis.com

Envelope ID: 84215421

Filing Code Description: Motion (No Fee)

Filing Description: Agreed Motion for Withdrawal of Attorney

Status as of 2/7/2024 10:29 AM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|-----------------|-----------|---------------------------|---------------------|--------|
| Cooper L.Carter | | coopercarter@majadmin.com | 2/6/2024 4:28:16 PM | SENT |

MR 10.7



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

TAB 11
ORDER OF WITHDRAW OF
ATTORNEY
02.08.24

MR 11

IN THE MATTER OF THE
MARRIAGE OF

MORGAN MICHELLE MYERS
AND
CHARLES DUSTIN MYERS

AND IN THE INTEREST OF
M [REDACTED] E [REDACTED] M [REDACTED] AND
C [REDACTED] R [REDACTED] M [REDACTED],
CHILDREN

§ IN THE DISTRICT COURT

§
§
§ 322ND JUDICIAL DISTRICT
§
§

§ TARRANT COUNTY, TEXAS

ORDER FOR WITHDRAWAL OF ATTORNEY

After reviewing the Motion for Withdrawal of Attorney filed by Daniel R. Bacalis, P.C.
on February 6, 2024, the Court ORDERS that the Motion is GRANTED.

The Court finds that the Motion is not made for delay and that there is good cause to
allow Daniel R. Bacalis to withdraw as attorney for CHARLES DUSTIN MYERS.

The Court further finds that CHARLES DUSTIN MYERS agrees and consents to the
withdrawal by Daniel R. Bacalis, P.C.

The Court finds that there is no attorney substituting in as counsel for CHARLES
DUSTIN MYERS at this time. The Court further finds that a copy of the Motion for Withdrawal
of Attorney was delivered to CHARLES DUSTIN MYERS, [REDACTED], [REDACTED], TX
[REDACTED] by email at chuckdustin12@gmail.com.

The Court further finds that CHARLES DUSTIN MYERS was notified in writing of the
right to object to the Motion.

The Court further finds that there are no pending settings or deadlines in this case.

IT IS ORDERED that Daniel R. Bacalis is discharged from further representing CHARLES DUSTIN MYERS as the attorney in charge in this suit. **IT IS FURTHER ORDERED** that Daniel R. Bacalis shall immediately notify CHARLES DUSTIN MYERS in writing of any additional settings or deadlines of which Daniel R. Bacalis has knowledge and has not notified CHARLES DUSTIN MYERS.

SIGNED on February 8 2024.

Associate 

JUDGE PRESIDING

APPROVED AS TO FORM ONLY:

Daniel R. Bacalis PC
669 Airport Freeway
Suite 307
Hurst, TX 76053
Tel: 817-498-4105
Fax: 817-282-0634

/s/ Daniel R. Bacalis
Daniel R. Bacalis
Attorney for CHARLES DUSTIN MYERS
State Bar No: 01487550
Email: dbacalis@dbacalis.com

Automated Certificate of eService

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Envelope ID: 84423007

Filing Code Description: No Fee Documents

Filing Description: ORD FOR W/D

Status as of 2/13/2024 8:49 AM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|-----------------|-----------|---------------------------|----------------------|--------|
| Cooper L.Carter | | coopercarter@majadmin.com | 2/12/2024 4:31:39 PM | SENT |

Associated Case Party: CHARLESDUSTINMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|------------------|-----------|-------------------------|----------------------|--------|
| Daniel Bacalis | | service@dbacalis.com | 2/12/2024 4:31:39 PM | SENT |
| Tammy L.Johnson | | tjohnson@dbacalis.com | 2/12/2024 4:31:39 PM | SENT |
| Daniel R.Bacalis | | dbacalis@dbacalis.com | 2/12/2024 4:31:39 PM | SENT |
| CHARLES MYERS | | chuckdustin12@gmail.com | 2/12/2024 4:31:39 PM | SENT |

TAB 12
EMERGENCY MOTION TO
RECONSIDER EVIDENCE AND
VACATE TEMPORARY ORDERS
02.08.24

MR 12

****THIS IS NOT A SUBSTITUTE FOR THE ADVICE OF AN ATTORNEY******NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**FILED
TARRANT COUNTY
2/9/2024 3:17 PM
THOMAS A. WILDER
DISTRICT CLERKCause No. Cause No. 322-744263-23

MORGAN MICHELLE MYERS § In the (*check one*):
V § 322nd District Court
____ § County Court at Law No. ____
CHARLES DUSTIN MYERS § TARRANT County, Texas

Motion for Reconsideration and to Vacate Temporary Orders*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 Reconsideration and to Vacate Temporary Orders *(title of motion)*. In support, the following is shown:

SEE ATTACHED MOTION



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

MR 12.1

Respectfully submitted,

► /s/ Charles Dustin Myers _____ 2024-02-09
Your Signature _____ Date

Charles Dustin Myers _____ 817-507-6562
Your Printed Name _____ Phone

[REDACTED] _____ [REDACTED] _____ TX _____ [REDACTED]
Mailing Address _____ City _____ State _____ Zip _____

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

Notice of Hearing

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

_____ (designation and location of court).

SIGNED on _____.

Judge or Clerk

MR 12.2



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

Certificate of Service

I certify that I delivered a copy of this document to each party in this case, or if a party is represented by a lawyer to the party's lawyer, by: (Check one or more)

Hand delivery to the other party _____

Hand delivery to the other party's lawyer _____

Email to this email address COOPERCARTER@MAJADMIN.COM

Regular mail to this address: _____

Certified mail to this address: _____

Commercial delivery service (for example FedEx) to this address: _____

Fax to fax #: _____



/s/ Charles Dustin Myers

Signature

2024-02-09

Date

MR 12.3



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

****THIS IS NOT A SUBSTITUTE FOR THE ADVICE OF AN ATTORNEY****

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

Cause No. _____

- § In the (*check one*):

§ _____ District Court
§ County Court at Law No. _____
§ _____ County, Texas

Order on Motion for _____

On _____ the Court heard the Motion for
(date)

_____ of _____
(title of motion) (name of person who filed the motion)

IT IS ORDERED that the motion is GRANTED

SIGNED on _____.

JUDGE PRESIDING

MR 12.4



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

IN THE 322nd DISTRICT COURT OF TARRANT COUNTY
STATE OF TEXAS

Morgan Michelle Myers,

Petitioner,

v.

Charles Dustin Myers,

Respondent

Cause No. 322-744263-23

**Emergency Motion to Reconsider
Evidence and to Vacate Temporary
Orders**

This motion urgently calls for the Court's intervention to address critical procedural missteps in the matter of cause# 322-744263-23, aiming to reinstate the safety and stability that our children rightfully deserve until due process and all facts of the case can be considered by the Court. I am seeking immediate court intervention to correct procedural errors and address the misuse of the legal system by the Petitioner. This motion highlights the significant impact of the Petitioner's actions on our children's welfare and my unjust removal from our home based on frivolous claims.

In pursuit of justice and the well-being of the children at heart, I respectfully request that the Court reconsider all details, weighing the comprehensive scenario presented herein along with the supporting evidence. I am committed to the highest interests of my children and family, striving to resolve these matters efficiently and avoid unnecessary judicial expenditure. This document seeks to unveil the Petitioner's deliberate misrepresentation and misuse of the legal system, which has gravely disrupted our children's stability and emotional well-being by weaponizing the court system.

¹ On December 1st, 2023, the Petitioner announced her desire for a divorce with no plan in place to preserve our familial stability, with no desire for counseling or communication, and with no consideration of the timing around the holiday season, nor any sign of marital discord warranting such a decision leading up to this announcement.

² Between December 14th, 2023, and December 22nd, 2023, the Petitioner filed for an Emergency Protective Order, a Divorce Petition, a Protective Order, and instigated an Eviction suit.

MR 12.5



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

NATURE OF SUITS AND THIRD-PARTY INFLUENCE

1. **On December 1st, 2023**, Petitioner announced the divorce with no plan in place for the children, no sign of marital discord leading up to this point to warrant such a decision, and no desire for counseling, communication, and no consideration for the time of year.
2. **Between December 1st, 2023, and December 12th, 2023**, all efforts are exhausted in an attempt to communicate with the Petitioner which lead to the subsequent discovery of an alarming volume of text messages that were directed towards two individuals – Debbie Price and Damen Kazlauskas, showing a significant level of influence.³
3. **On December 12th, 2023**, After the discovery of the communications between these two individuals combined with the irrational behavior from the Petitioner during such a critical time of year, I reached out to the Petitioner's grandfather via text message.⁴
4. **On December 13th, 2023**, Petitioner states she will be going to talk to her Grandparents alone. This conversation lasts between 9:55 and 1:30 A.M.
5. **On December 14th, 2023**, Petitioner filed for an Emergency Protective Order. This order was denied by the court.
6. **On December 15th, 2023**, Petitioner involves her family into the situation. Particularly, Dan Branthoover became involved. He is the boyfriend of the Petitioner's Mother. Shortly thereafter, I received a notice from our joint bank account stating that \$1,576 had just been withdrawn. As our bank statement for December 2023 will demonstrate – the transaction record shows the funds being transferred directly to Mr. Branthoover's PayPal account.⁵

³ See attached EXHIBIT A.1 – A true and accurate copy of the AT&T text logs filtered by relevant parties. Parties include Meme, Papaw, Damen, Debbie, and Dan. Dates and times surrounding the case will corroborate with other evidence presented herein. See page 456 – 458.

⁴ See attached EXHIBIT A.2 – A true and accurate copy of the referenced text message in paragraph 3.

⁵ See attached EXHIBIT A.3 – The true and accurate bank statement reflecting the transaction referenced in paragraph 6.



7. **On December 16th, 2023**, Petitioner's transaction under the advice of Mr. Branthroover lead to our joint bank account becoming \$-800 overdrawn. I requested from Mr. Branthroover via text message that he needs to return the funds immediately, where he subsequently admits to this transaction having occurred.⁶
8. **On December 17th, 2023**, Petitioner's grandmother, Margie Wilson, initiates an Eviction Suit by serving me an eviction notice around 11:00 AM CST.
9. **On December 18th, 2023** – Petitioner writes “VOID” on the Eviction Notice, and physically tears it in half.⁷
10. **On December 19th, 2023**, Mr. Branthroover uses intimidation tactics by impersonating an attorney despite having no license to practice law in the State of Texas.⁸
11. **On December 27th, 2023**, I am served the Divorce Papers by the Constable.
12. **On December 28th, 2023**, I am served the Protective Order, followed by the Eviction shortly thereafter by the Constable.

The Protective Order (Show Cause) hearing was set for **January 16th, 2024**, and the Eviction hearing for **January 17th, 2024**.

The documented timeline of events, particularly during the holiday season, underscores a notable disregard for our children's welfare. This has enabled the Petitioner to inappropriately utilize the judicial system to disrupt the stable environment our children have known, influenced significantly by third-party actions as previously detailed. The forthcoming section of this motion will highlight the specific frivolous claims and false statements found within each filing initiated by the Petitioner.

⁶ See attached EXHIBIT A.4 – Overdrawn account notice from PNC bank on December 16th, 2023.

⁷ See attached EXHIBIT A.5 – The physically torn and voided Eviction notice served on December 17th, 2023.

⁸ See attached EXHIBIT A.6 – Mr. Branthroover refers to Petitioner as “his client” while having no license in law.



FRIVOLOUS CLAIMS AND FALSE STATEMENTS

A. EMERGENCY PROTECTIVE ORDER

1. As mentioned above, Petitioner filed for an Emergency Protective Order on December 14th, 2023. This protective order was denied by the courts.
2. Due to the fact this order was not granted by the court, one could conclude that there was not a clear and present danger of family violence.¹

B. THE DIVORCE PETITION

1. Petition was filed on 2024-12-18 under an Affidavit of Inability to pay.²
2. The Petitioner's action of filing for divorce under an Affidavit of Inability to pay three days after transferring \$1,576 to herself starkly contravenes the mandates set forth in *Chapter 10, Section 10.001 of the Civil Practice and Remedies Code*. This section asserts that each claim or legal contention must be warranted by existing law or a nonfrivolous argument for the modification of existing law or the establishment of new law, and that each factual contention has or is likely to have evidentiary support after further investigation or discovery³.
3. The Petitioner violated *Chapter 10, Section 10.001* a second time within the same document when she intentionally elected to waive the 60-day waiting period claiming to have an active protective order against me that found family violence had occurred during our marriage⁴ despite being denied such an order just five days prior on December 14th, 2023.
5. The final page of the Divorce Petition for service to the Office of the Attorney General was left unsigned by the Petitioner.

¹ TEXAS FAMILY CODE, TITLE 4, SUBTITLE B, CHAPTER 83, Sec. 83.001

² See attached EXHIBIT B.1 – A True and Accurate copy of the Divorce Petition for all references made in regard to this document.

³ CIVIL PRACTICE AND REMEDIES CODE, TITLE 2, SUBTITLE A, CHAPTER 10, Sec. 10.001.

⁴ TEXAS FAMILY CODE, Sec. 6.405 – The petitioner shall attach to the petition a copy of each order described by Subsection (a)(1). No such order, as required, was attached to the divorce petition, because no such order exists.

MR 12.8



C. EVICTION SUIT

1. The suit was unlawful by nature⁵, as the grounds for eviction were based on family status, referencing the divorce as well as a protective order that had been denied on December 14th, 2023. The suit was dismissed for lack of jurisdiction on January 17th, 2024.⁶

D. PROTECTIVE ORDER

1. This suit was the second attempt by the Petitioner to have me removed from the home, which ultimately succeeded.

2. The claims within this suit mentioned sexually aggressive comments and threatening behavior. These allegations are materially false, as the Petitioner possesses no evidence, and has presented no evidence in relation to these claims since the initiation of the suit. Despite this, as video and image evidence will show once a fair trial date is set, the Petitioner and I continued to maintain stability at our family home and preserved the sense of normalcy that our daughters have been accustomed to their entire lives up until January 16th, 2024.

The Court's decision to remove me from my home and my children's lives on January 16th, 2024, albeit preliminary and unjustified, bypassed the safeguarding of the children's emotional, psychological, and physical well-being. This oversight is compounded by the Petitioner's actions. The juxtaposition of the Court's decision against the backdrop of the Petitioner's inattention to the children's needs illuminates a disconcerting disregard for the paramount principle that custody determinations should primarily serve the children's best interests. The final section of this motion will highlight the procedural aspects of the events unfolding between the dates of January 16th, 2024, and February 1st, 2024, and pray the court will rectify this situation by restoring the stability to our family by vacating the current temporary orders that are in place until a proper investigation can be completed by the courts.

⁵ TEXAS RULES OF CIVIL PROCEDURE – RULE 6 – Suits initiated on a Sunday are invalid.

⁶ See attached EXHIBIT B.2 – A true and accurate copy of the Eviction Dismissal.



THE PROTECTIVE ORDER HEARINGS

1. In preparation for the Protective Order hearing on January 16th, 2024, I filed with the Court an answer to the Protective Order on January 2nd, 2024 as well as two motions – a motion to consolidate the divorce with the protective order, filed on January 4th, 2024, as well as a motion of continuance, filed on January 8th, 2024 for the purpose to acquire counsel due to the complex nature of the case.¹ All three filings were accepted by the court.
2. On January 16th, 2024, both parties sought additional time to secure legal representation. Despite not reviewing any evidence, witness testimonies, or documents related to the motions, and acknowledging the denial of a previous Emergency Protective Order, the court mandated my departure from our home within four hours. This decision, unexpectedly made, awarded custody to the Petitioner, overlooking my concerns about the adverse effects on our children and my work from home. This ruling, which both parties did not sign, set the case to resume on January 22nd, 2024, to allow time for obtaining counsel.²
3. Following the court's directive, I relocated to my father's residence in Flower Mound until the subsequent hearing. During this interval, the Petitioner did not take the initiative to have the children call once and did not provide any information as to how they were doing, showcasing her lack of empathy and concern for our children's well-being and stability. After incurring substantial expenses to secure representation, I detailed my case and concerns to my attorney, preparing for the next court appearance.
4. On January 22nd, 2024, the Petitioner chose to seek legal representation just minutes before the hearing was due to start, indicating a disregard for the process. My lawyer recommended agreeing to a continuance, thereby extending the period I couldn't work and impacting our established family dynamics. This resulted in a third hearing being set for February 1st, coinciding with my birthday, and a second rendition being ordered.³

¹ See attached EXHIBIT C.1 – A true and accurate copies of all referenced filings in paragraph 1.

² See attached EXHIBIT C.2 – A true and accurate copy of the unsigned rendition ordered on January 16th, 2024.

³ See attached EXHIBIT C.3 – A true and accurate copy of the second rendition ordered on January 22nd, 2024.



5. On February 1st, 2024, during the third hearing, the substantive issues I had raised were not addressed, nor was there any exchange of evidence between our legal representatives. Despite the focus of the hearing supposed to be on the protective order, the discussions veered into custody and child support matters. My lawyer presented the sole option of a temporary return to the family home for 30 days with expanded visitation rights, coupled with a child support obligation starting in April. This outcome, which diverged significantly from the case's core issues, compelled me to reconsider my legal representation. Consequently, I decided to terminate my attorney's services and embarked on drafting this motion myself, aiming to bring the court's attention back to the pivotal elements of the case that had thus far been neglected while able to legally reside in my home.

CONCLUSION AND PRAYER

In conclusion, this motion has laid bare the stark realities and procedural aberrations that have marred the essence of justice and due process in the matter of Cause No. 322-744263-23. Through the course of these proceedings, it has become abundantly clear that the actions taken by the Petitioner, Morgan Michelle Myers, have not only disregarded the welfare and best interests of our children but have also illuminated her unfitness as a parent. Her actions speak to a pattern of deceit, manipulation, and an unsettling willingness to leverage the judicial system for personal vendettas, all at the expense of the emotional and psychological well-being of our children.

The court, in its decisions, inadvertently facilitated this troubling trajectory by removing me, Charles Dustin Myers, from the lives of our children based on unsubstantiated claims and without due consideration of my role as a devoted and stable parent. This oversight has not only disrupted the lives of our children but has also significantly impaired my ability to provide for them, casting a long shadow over their future stability and welfare.

Moreover, the conduct of my Counsel involved has further compounded these issues, demonstrating a distressing disregard for the intricate dynamics and facts of this case. This has culminated in a situation where the paramount importance of the children's best interests and the fundamental principles of fairness and justice have been overshadowed by procedural missteps and a lack of thorough investigation into the Petitioner's fitness as a parent.



Therefore, it is with a heavy hearted yet unwavering resolve that I implore the Court to take immediate and decisive action to rectify these wrongs. Specifically, I respectfully request the Court to:

1. Vacate the existing temporary orders that unjustly removed me from my home and separated me from my children, restoring the status quo ante until a thorough and unbiased evaluation of the facts can be conducted, as the Texas Constitution requires. If left as it stands, these orders will further compound the issues at hand, and will exacerbate the chaos introduced into the children's lives.
2. Set a fair hearing date to delve into the substantive issues at hand, ensuring that all parties are given an equitable opportunity to present their case and that the best interests of our children are placed at the forefront of all considerations.
3. Scrutinize any response or new claims from the Petitioner or her counsel with the utmost diligence, given the established pattern of deceitful and manipulative behavior exhibited by the Petitioner throughout these proceedings.
4. Consider awarding me full custody of our children, ensuring their continued access to a stable, nurturing environment, and the consistent provision of their needs, which I am fully committed to upholding. Furthermore, in alignment with my enduring belief in the importance of both parents in the lives of our children, I pledge to facilitate and encourage a healthy, constructive relationship between the children and their mother, provided she demonstrates a genuine commitment to their well-being and stability.
5. In seeking these remedies, I do so not out of vindictiveness but from a place of deep concern for the welfare of our children and a steadfast belief in the principles of justice and fairness. Despite the pain and turmoil of these proceedings, my ultimate desire is for peace and the best possible outcome for all parties involved, most importantly, our children. It is my sincere hope that the Court will recognize the gravity of the situation and act in a manner that prioritizes the well-being of our children, ensuring their return to a life marked by stability and love.

I affirm under penalty of perjury that all claims herein are true and accurate to the best of my knowledge.

Respectfully submitted on this 9th day of February 2024,

/s/ Charles Dustin Myers

Charles Dustin Myers

Chuckdustin12@gmail.com



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: 84359156

Filing Code Description: Motion (No Fee)

Filing Description: EMERGENCY MOTION TO RECONSIDER EVIDENCE
AND VACATE TEMPORARY ORDERS

Status as of 2/9/2024 4:27 PM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------------|-----------|---------------------------|---------------------|--------|
| MORGAN MICHELLEMYERS | | morganmw02@gmail.com | 2/9/2024 3:17:19 PM | SENT |
| Cooper L.Carter | | coopercarter@majadmin.com | 2/9/2024 3:17:19 PM | SENT |

Associated Case Party: CHARLESDUSTINMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|------------------|-----------|-------------------------|---------------------|--------|
| Daniel Bacalis | | service@dbacalis.com | 2/9/2024 3:17:19 PM | SENT |
| Tammy L.Johnson | | tjohnson@dbacalis.com | 2/9/2024 3:17:19 PM | SENT |
| Daniel R.Bacalis | | dbacalis@dbacalis.com | 2/9/2024 3:17:19 PM | SENT |
| CHARLES MYERS | | chuckdustin12@gmail.com | 2/9/2024 3:17:19 PM | SENT |

MR 12.13



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

TAB 13

FIRST
CORRESPONDENCE
WITH OPPOSING
COUNSEL

MR 13

3/13/24, 2:02 PM

Gmail - RE: Myers 322-744263-23 CL-12105

The Court received a Motion for Reconsideration and to Vacate Temporary Orders from Respondent. Below are dates the Court is available to set the hearing:

Feb 27, 28, 29.

March 1, 12, 13, 14, 15, 19, 20.

At 9:00 a.m., 9:30 a.m. or 10:00 a.m.

Mr. Myers you will need to conference with Ms. Carter or her office to discuss availability. Once you both have agreed to a date and time, please email me and I will set the hearing.

Thank you.

Lindsey Baker

322nd Court Coordinator

Tarrant County Family Law Center

200 E. Weatherford, 4th floor

Fort Worth, Texas 76196

Phone: (817) 884-1597

Charlie Vids <chuckdustin12@gmail.com>
To: victoriaweaver@majadmin.com

Wed, Feb 14, 2024 at 1:29 PM

Ms. Weaver,

I appreciate your prompt response indicating the availability on March 14th. Due to the emergency nature of the circumstances, and as outlined in my previous correspondence, a date on or before March 1st would be more appropriate.

Please clarify if March 14th is the earliest live date available for this matter. If so, given the urgency, I propose an alternative approach to expedite our discussions via video conference. This would allow us to address the urgent issues at hand without further delay accommodating any scheduling conflicts.

If March 14th is indeed the earliest live date available for your office, please advise a date and time that works best on or before March 1st, 2024 that we can schedule for a video conference hearing.

Upon your correspondence, I will draft the appropriate agreed motion and send it to your office for Ms. Carter's signature, and notify the Court in accordance with Texas Rules of Civil Procedure 21 d and Tarrant County Family Law Local Rules.

Your understanding and cooperation in finding a timely solution are greatly valued.

Best regards,



Charlie Vids <chuckdustin12@gmail.com>

RE: Myers 322-744263-23 CL-12105

3 messages

Victoria Weaver <victoriaweaver@majadmin.com>
To: chuckdustin12@gmail.com

Tue, Feb 13, 2024 at 7:35 AM

Our office is available March 14.

Sincerely,**Victoria P. Weaver,**

Attorney at Law

Co-Counsel

Marx, Altman & Johnson

2905 Lackland Road

Fort Worth, Texas 76116

Tel: (817) 926-6211

Fax: (817) 926-6188

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From: Lindsey K. Baker [mailto:LKBaker@tarrantcountytx.gov]
Sent: Monday, February 12, 2024 1:35 PM
To: chuckdustin12@gmail.com; Cooper Carter
Subject: Myers 322-744263-23 CL-12105

MR 13.2

3/13/24, 2:02 PM

Charles Dustin Myers
chuckdustin12@gmail.com
817-507-6562
[Quoted text hidden]

Gmail - RE: Myers 322-744263-23 CL-12105

Cooper Carter <coopercarter@majadmin.com>
To: Charlie Vids <chuckdustin12@gmail.com>

Wed, Feb 14, 2024 at 3:55 PM

Mr. Myers,

Regarding a hearing, I only have availability for March 14th. I will be filing a counter motion.

Sincerely,

Cooper L. Carter
Attorney at Law

[Quoted text hidden]

MR 13.3

TAB 14
NOTICE OF HEARING
01.16.2024

MR 14

****THIS IS NOT A SUBSTITUTE FOR THE ADVICE OF AN ATTORNEY****

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

FILED
TARRANT COUNTY
2/9/2024 3:17 PM
THOMAS A. WILDER
DISTRICT CLERK
FILED
TARRANT COUNTY
2/27/2024 12:33 PM
THOMAS A. WILDER
DISTRICT CLERK

Cause No. _____ Cause No. 322-744263-23 _____

MORGAN MICHELLE MYERS § In the (*check one*):

V _____ § 322nd District Court

CHARLES DUSTIN MYERS § County Court at Law No. _____
§ TARRANT County, Texas

Motion for Reconsideration and to Vacate Temporary Orders

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 Reconsideration and to Vacate Temporary Orders. In support, the following is shown:

SEE ATTACHED MOTION



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

MR 14.5

Respectfully submitted,

► /s/ Charles Dustin Myers 2024-02-09
Your Signature Date

Charles Dustin Myers 817-507-6562
Your Printed Name Phone

[REDACTED] [REDACTED] TX [REDACTED]
Mailing Address City State Zip

CHUCKDUSTIN12@GMAIL.COM [REDACTED]
Email Address Fax # (if any)

Notice of Hearing

The above motion is set for hearing on March 14, 2024 at 9:00 a.m. in
322nd Associate Court, 4th Floor,
200 E.Wetherford, Ft.Worth TX 76196 (specify date, time, court, and location).

SIGNED on 2-15-24

James B. Myers, Jr.
Judge or Clerk

MR 14.6



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

Certificate of Service

I certify that I delivered a copy of this document to each party in this case, or if a party is represented by a lawyer to the party's lawyer, by: (Check one or more)

Hand delivery to the other party _____

Hand delivery to the other party's lawyer _____

Email to this email address COOPERCARTER@MAJADMIN.COM

Regular mail to this address: _____

Certified mail to this address: _____

Commercial delivery service (for example FedEx) to this address: _____

Fax to fax #: _____

 /s/ Charles Dustin Myers
Signature

2024-02-09

Date

MR 14.7



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

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Filing Description:

Status as of 2/27/2024 3:17 PM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|-----------------|-----------|---------------------------|-----------------------|--------|
| Cooper L.Carter | | coopercarter@majadmin.com | 2/27/2024 12:33:14 PM | SENT |

Associated Case Party: CHARLESDUSTINMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|---------------|-----------|-------------------------|-----------------------|--------|
| CHARLES MYERS | | chuckdustin12@gmail.com | 2/27/2024 12:33:14 PM | SENT |

MR 14.8



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

TAB 15

NOTICE AND
UNSWORN
DECLARATION

03.03.24

MR 15

IN THE 322nd DISTRICT COURT OF TARRANT COUNTY
 STATE OF TEXAS

Morgan Michelle Myers,

Petitioner,

v.

Charles Dustin Myers,

Respondent

Cause No. 322-744263-23

NOTICE AND UNSWORN DECLARATION

March 3, 2024

Dear Clerk of the Court,

This letter is submitted on behalf of the Respondent in the above-referenced case to provide the court with an update on the Respondent's efforts to uphold the well-being of the children under the current agreed arrangements pending review and to navigate the complexities of this case. The following reasons why it is impossible for the Respondent to vacate the family home under the current agreement pending review are as follows:

1. Since the inception of the case, the Respondent's primary focus has been to reset the status quo ante for the benefit of the children, ensuring their lives remain as normal and uninterrupted as possible during this transitory period after it was significantly disrupted beginning on January 16th, 2024. Despite the challenges posed by the non-suited protective order and the dropped allegations of family violence which were the foundations of all decisions made within this case, the Respondent has respected the orders pending review, and has strived to provide a stable and supportive environment for his children during his designated time, all while planning a transition that best suits his children.
2. During the short amount of time the Respondent has been re-instated to his home, the Petitioner has, on multiple occasions, entered the residence unannounced and without prior consent, actions which stand in stark contrast to her prior requests for protection which have governed this case.



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

MR 15.1

3. The Petitioner has changed employers since the signing of the agreement.
4. Petitioner has relinquished custody of the children to the Respondent on multiple days during her scheduled time, showcasing the Respondent's ability to care for his children at any time given his at-home work schedule specifically crafted to ensure participation in every aspect of his children's lives remains possible.
5. The Respondent must dedicate substantial time to researching and understanding legal procedures to ensure compliance with court rules and to advocate effectively for the best interests of his children. He is prepared to present all relevant facts and evidence at the upcoming hearing on March 14th, should his partial summary judgment not be accepted.
6. The Respondent has made efforts over the past 30 days to maintain normalcy for his children, showcasing his dedication to their well-being. The Respondent has maintained an amicable relationship with the Grandparents residing next-door, allowing frequent access during his time with the children to visit and attend church, maintaining normalcy and peace.
7. The choice to remain outside the home is a deliberate decision by the Petitioner during the transition period. Self-hosting and advertising is an essential requirement for my at-home operations, which is essential to maintain the quality of life our children are accustomed to. Multiple alternative housing options are available to the Petitioner, including the house next door.

The Respondent remains committed to following the court's directives and ensuring the best possible outcomes for his children. He appreciates the court's attention to these matters and is ready to provide further information or clarification as needed.

My name is Charles Dustin Myers my date of birth is ~~02-01-1991~~, and my address is ~~6641 Anne Court, Watauga TX, 76148~~, United States. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Tarrant County, TX on this 3rd day of March 2024.

/s/ Charles Dustin Myers
Charles Dustin Myers, Declarant

MR 15.2



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

Certificate of Service

I certify that a true copy of the Notice and Unsworn Declaration was served in accordance with Rule 21a of the Texas Rules of Civil Procedure on 2024-03-03 to:

Morgan Michelle Myers, Petitioner

By electronic filing manager/email at MORGANMW02@GMAIL.COM

Cooper Carter, Attorney

By electronic filing manager/email at COOPERCARTER@MAJADMIN.COM

/s/ Charles Dustin Myers

Charles Dustin Myers

Respondent

~~8041 Main Court~~

~~Watauga, Tx 76148~~

817-507-6562

MR 15.3



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

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Envelope ID: 85135431

Filing Code Description: Notice

Filing Description: Notice / Unsworn Declaration

Status as of 3/4/2024 9:02 AM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------------|-----------|---------------------------|----------------------|--------|
| MORGAN MICHELLEMYERS | | morganmw02@gmail.com | 3/3/2024 11:56:06 PM | SENT |
| Cooper L.Carter | | coopercarter@majadmin.com | 3/3/2024 11:56:06 PM | SENT |

Associated Case Party: CHARLESDUSTINMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|---------------|-----------|-------------------------|----------------------|--------|
| CHARLES MYERS | | chuckdustin12@gmail.com | 3/3/2024 11:56:06 PM | SENT |

MR 15.4



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ATTEST: 04/15/2024
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TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

**TAB 16 ASSOCIATE
JUDGES REPORT**

03.14.26

MR 16

322ND FAMILY DISTRICT COURT
ASSOCIATE JUDGE'S REPORT
FOR TEMPORARY ORDERS

CAUSE NUMBER: 322 - 744263-23

ITMOTMO/INRE/ITIO

Myers

§
§
§
§
§

IN THE DISTRICT COURT
TARRANT COUNTY, TEXAS
322ND JUDICIAL DISTRICT

1. IT is ordered that Movant's motion for to Vacate is denied.
2. It is ordered that Movant shall provide Mrs. ^{myers'} attorney with a list of the technology he needs from the marital home, for his business.
3. It is ordered that the parties shall present a the ^{signed} temporary orders by regarding the ACR ~~filed~~ on 2/11/2024 by 1:30pm today.

Approved as to form

Cory

Attorney for Petitioner

Attorney for Respondent

Court Notes that Respondent would not sign this report as to form. He did agree that paragraphs 1 & 3 correctly reflect the Court's ruling after a hearing.
Petitioner reflected the Court's ruling after a hearing.
SO ORDERED: He did not agree to Paragraph 2 accurately reflect the Court's ruling, but provided no alternative language, therefore the Court signed this report.

3/14/22

Date

Associate Judge

Page ____ of ____

200 East Weatherford Street
Fort Worth, Texas 76196

MR 16.1



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

TAB 17
TEMPORARY
ORDERS
SIGNED 03.14.26

MR 17

CAUSE NO. 322-744263-23**IN THE MATTER OF
THE MARRIAGE OF****MORGAN MYERS
AND
CHARLES MYERS****AND IN THE INTEREST OF****M [REDACTED] M [REDACTED] AND C [REDACTED]
M [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, MORGAN MYERS, 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, CHARLES MYERS, 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



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ATTEST: 04/16/2024
THOMAS A. WILDER
DISTRICT CLERK
TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

MR 17.1

following children:

Name: M [REDACTED] M [REDACTED]

Sex: Female

Birth date: 7 years

Home state: Texas

Name: C [REDACTED] M [REDACTED]

Sex: Female

Birth date: 5 years

Home state: Texas

Conservatorship

IT IS ORDERED that MORGAN MYERS and CHARLES MYERS are appointed Temporary Joint Managing Conservators of the following children: M [REDACTED] M [REDACTED] and C [REDACTED] M [REDACTED]

IT IS ORDERED that, at all times, MORGAN MYERS, 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



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TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

MR 17.2

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, CHARLES MYERS, 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, MORGAN MYERS and CHARLES MYERS, 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



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TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

MR 17.3

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, MORGAN MYERS, 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;

MR 17.4



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TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

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, CHARLES MYERS, 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 MORGAN MYERS, 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



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TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

MR 17.5

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 CHARLES MYERS, 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.



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TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

MR 17.6

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 MORGAN MYERS 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:

MORGAN MYERS

morganm202@gmail.com



A CERTIFIED COPY
ATTEST: 04/16/2024
THOMAS A. WILDER
DISTRICT CLERK
TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

MR 17.7

CHARLES MYERS

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



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THOMAS A. WILDER
DISTRICT CLERK
TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

MR 17.8

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 CHARLES MYERS resides 50 miles or less from the primary residence of the child, CHARLES MYERS 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 CHARLES MYERS 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 CHARLES MYERS 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



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ATTEST: 04/16/2024
THOMAS A. WILDER
DISTRICT CLERK
TARRANT COUNTY, TEXAS
BY: /s/ Catherine Saenz

MR 17.9

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 CHARLES MYERS –

With Written Notice by April 1 - If CHARLES MYERS gives MORGAN MYERS written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, CHARLES MYERS 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 CHARLES MYERS does not give MORGAN MYERS written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, CHARLES MYERS 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 CHARLES MYERS, it is expressly ORDERED that MORGAN MYERS 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 MORGAN MYERS - If MORGAN MYERS gives CHARLES MYERS written notice by April 15 of a year, MORGAN MYERS 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 CHARLES MYERS in that year, provided that MORGAN MYERS picks up the child from CHARLES MYERS 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, CHARLES MYERS must give MORGAN MYERS written notice of the location at which MORGAN MYERS is to pick up and return the child.

3. Extended Summer Possession by MORGAN MYERS - If MORGAN MYERS gives CHARLES MYERS 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



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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 CHARLES MYERS shall not take place in that year, provided that the weekend so designated does not interfere with CHARLES MYERS's period or periods of extended summer possession or with Father's Day possession.

Notwithstanding the weekend and Thursday periods of possession of CHARLES MYERS, MORGAN MYERS and CHARLES MYERS shall have the right to possession of the child as follows:

1. Christmas Holidays in Even-Numbered Years - In even-numbered years, CHARLES MYERS 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 MORGAN MYERS 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, MORGAN MYERS 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 CHARLES MYERS 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, CHARLES MYERS 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, MORGAN MYERS 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 - CHARLES MYERS shall have the right to possession of the child each year, beginning at 6:00 P.M. on the Friday preceding



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

7. Mother's Day - MORGAN MYERS 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 MORGAN MYERS is not otherwise entitled under this Standard Possession Order to present possession of the child, she shall pick up the child from CHARLES MYERS's 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 CHARLES MYERS resides more than 50 Miles but 100 miles or less from the primary residence of the child, CHARLES MYERS 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 CHARLES MYERS 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 CHARLES MYERS ends on or is immediately followed by a student holiday or a teacher in-service day that falls on



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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 CHARLES MYERS 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 CHARLES MYERS gives MORGAN MYERS written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, CHARLES MYERS 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 CHARLES MYERS does not give MORGAN MYERS written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, CHARLES MYERS 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 CHARLES MYERS, it is expressly ORDERED that MORGAN MYERS 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.



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2. Summer Weekend Possession by MORGAN MYERS - If MORGAN MYERS gives CHARLES MYERS written notice by April 15 of a year, MORGAN MYERS 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 CHARLES MYERS in that year, provided that MORGAN MYERS picks up the child from CHARLES MYERS 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, CHARLES MYERS must give MORGAN MYERS written notice of the location at which MORGAN MYERS is to pick up and return the child.

3. Extended Summer Possession by MORGAN MYERS - If MORGAN MYERS gives CHARLES MYERS 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 CHARLES MYERS shall not take place in that year, provided that the weekend so designated does not interfere with CHARLES MYERS's 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 CHARLES MYERS resides more than 100 miles from the residence of the child, CHARLES MYERS shall have the right to possession of the child as follows:

1. Weekends - Unless CHARLES MYERS elects the alternative period of weekend possession described in the next paragraph, CHARLES MYERS 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, CHARLES MYERS shall have the right to possession of the child not more than one weekend per month of CHARLES MYERS's 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. CHARLES MYERS may elect an option for this alternative period of weekend possession by giving written notice to MORGAN MYERS within ninety days after the parties begin to reside more than 100 miles apart. If CHARLES MYERS makes this election, CHARLES MYERS shall give MORGAN MYERS

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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 CHARLES MYERS 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 CHARLES MYERS 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 CHARLES MYERS 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 CHARLES MYERS –

With Written Notice by April 1 - If CHARLES MYERS gives MORGAN MYERS written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, CHARLES MYERS 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 CHARLES MYERS does not give



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MORGAN MYERS written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, CHARLES MYERS 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 CHARLES MYERS, it is expressly ORDERED that MORGAN MYERS shall have a superior right of possession of the child as follows:

1. Summer Weekend Possession by MORGAN MYERS - If MORGAN MYERS gives CHARLES MYERS written notice by April 15 of a year, MORGAN MYERS 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 CHARLES MYERS during CHARLES MYERS's extended summer possession in that year, provided that if a period of possession by CHARLES MYERS 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 MORGAN MYERS picks up the child from CHARLES MYERS 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 MORGAN MYERS - If MORGAN MYERS gives CHARLES MYERS written notice by April 15 of a year, MORGAN MYERS 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 CHARLES MYERS shall not have possession of the child, provided that the period or periods so designated do not interfere with CHARLES MYERS's 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 CHARLES MYERS, except when CHARLES MYERS resides fifty miles or less from the primary residence of the child, MORGAN MYERS and CHARLES MYERS shall have the right to possession of the child as follows:

1. Christmas Holidays in Even-Numbered Years - In even-numbered years, CHARLES MYERS 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 MORGAN MYERS shall have the right to possession of the child beginning at noon on December 28 and ending



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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, MORGAN MYERS 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 CHARLES MYERS 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, CHARLES MYERS 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, MORGAN MYERS 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 - CHARLES MYERS 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 CHARLES MYERS is not otherwise entitled under this Standard Possession Order to present possession of the child, he shall pick up the child from MORGAN MYERS's residence and return the child to that same place.

7. Mother's Day - MORGAN MYERS 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 MORGAN MYERS is not otherwise entitled under this Standard Possession Order to present possession of the child, she shall pick up the child from CHARLES MYERS's residence and return the child to that same place.

(g) Undesignated Periods of Possession

MORGAN MYERS shall have the right of possession of the child at all



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other times not specifically designated in this Standard Possession Order for CHARLES MYERS.

(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 MORGAN MYERS - MORGAN MYERS is ORDERED to surrender the child to CHARLES MYERS at the beginning of each period of CHARLES MYERS's possession at the residence of MORGAN MYERS.

If a period of possession by CHARLES MYERS begins at the time the child's school is regularly dismissed, MORGAN MYERS is ORDERED to surrender the child to CHARLES MYERS 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, CHARLES MYERS shall pick up the child at the residence of MORGAN MYERS at 6:00 P.M., and MORGAN MYERS is ORDERED to surrender the child to CHARLES MYERS at the residence of MORGAN MYERS at 6:00 P.M. under these circumstances.

2. Surrender of Child by CHARLES MYERS - CHARLES MYERS is ORDERED to surrender the child to MORGAN MYERS at the residence of CHARLES MYERS at the end of each period of possession.

If a period of possession by CHARLES MYERS ends at the time the child's school resumes, CHARLES MYERS is ORDERED to surrender the child to MORGAN MYERS 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 MORGAN MYERS at 6:00 P.M.

3. Surrender of Child by CHARLES MYERS - CHARLES MYERS is ORDERED to surrender the child to MORGAN MYERS, if the child is in CHARLES MYERS's possession or subject to CHARLES MYERS's 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 MORGAN MYERS - MORGAN MYERS is ORDERED to return the child to CHARLES MYERS, if CHARLES MYERS is entitled to possession of the child, at the end of each of MORGAN MYERS's exclusive periods of possession, at the place designated in this Standard Possession Order.

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



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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 MORGAN MYERS - If CHARLES 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, CHARLES MYERS shall immediately notify the school and MORGAN MYERS 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 CHARLES MYERS pay to MORGAN MYERS for the support of MARA MYERS and CAROLINE MYERS 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.



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Withholding from Earnings

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

IT IS FURTHER ORDERED that all amounts withheld from the disposable earnings of CHARLES MYERS 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 CHARLES MYERS, and it is hereby ORDERED that CHARLES MYERS 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 MORGAN MYERS 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, CHARLES MYERS's name as the name of the noncustodial parent (NCP), and MORGAN MYERS's 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.



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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 CHARLES MYERS shall notify this Court and MORGAN MYERS 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 CHARLES MYERS 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, MORGAN MYERS, CHARLES MYERS, or an attorney representing MORGAN MYERS or CHARLES MYERS, 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 MORGAN MYERS and CHARLES MYERS shall each provide additional child support for each child as set out in this order for as long as the Court may order MORGAN MYERS and CHARLES MYERS to provide support for the child under sections 154.001 and 154.002 of the Texas Family Code. Beginning on the day MORGAN MYERS and CHARLES MYERS's actual or potential obligation to support a child under sections 154.001 and 154.002 of the Family Code terminates, IT IS ORDERED that MORGAN MYERS and CHARLES MYERS 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.



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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 MORGAN MYERS is responsible under a medical support order that does not exceed 9 percent of MORGAN MYERS's 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.



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4. Provision of Health-Care Coverage –

As Petitioner's child support, MORGAN MYERS 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. MORGAN MYERS 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. MORGAN MYERS' 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 MORGAN MYERS receives or is provided with the renewal, change, or additional information;
 - e. To notify each conservator of the children of any termination or



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- 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 MORGAN MYERS 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 MORGAN MYERS 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 MORGAN MYERS 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 CHARLES MYERS 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



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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 health-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.



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No Termination of Orders on Death of Obligee

An obligation to pay child support under this order does not terminate on the death of MORGAN MYERS but continues as an obligation to M [REDACTED] M [REDACTED] and C [REDACTED] M [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



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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 MORGAN MYERS shall be responsible for the timely payment of the following:

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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 CHARLES MYERS 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



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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 MORGAN MYERS and CHARLES MYERS 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 MORGAN MYERS and CHARLES MYERS 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 MORGAN MYERS and CHARLES MYERS 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 MORGAN MYERS and CHARLES MYERS 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 MORGAN MYERS and CHARLES MYERS shall each timely post on the AppClose website a copy of any email received by the party from the



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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



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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



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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



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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



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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



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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



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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;



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- 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.

Associate 
JUDGE PRESIDING

APPROVED AS TO FORM ONLY:

MARX ALTMAN & JOHNSON

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2905 Lackland Rd.
FT. WORTH, Texas 76116
Tel: (817) 926-6211
Fax: (817) 926-6188

By:  

Cooper L. Carter
Attorney for Petitioner
State Bar No. 24121530
cooper.carter@majadmin.com

Daniel R. Bacalis PC
669 Airport Freeway
Suite 307
Hurst, TX 76053
Office Phone: (817)498-4105
Fax: (817)282-0634

By: 

Daniel Bacalis
Attorney for Respondent
State Bar No. 01487550
dbacalis@dbacalis.com

APPROVED AND CONSENTED TO AS TO BOTH FORM AND SUBSTANCE:

MORGAN MYERS
PETITIONER

CHARLES MYERS
RESPONDENT



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Filing Description:

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

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------------|-----------|---------------------------|----------------------|--------|
| MORGAN MICHELLEMYERS | | morganmw02@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: CHARLESDUSTINMYERS

| 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 |
| CHARLES MYERS | | chuckdustin12@gmail.com | 3/26/2024 3:19:25 PM | SENT |

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TAB 18
REQUEST FOR FINDINGS
OF FACT AND
CONCLUSIONS OF LAW

03.26.24

MR 18

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

IN THE 322nd DISTRICT COURT
OF TARRANT COUNTY
FORT WORTH, TEXAS

No. 322-744263-23 (consolidated)¹

Morgan Michelle Myers,

Petitioner,

v.

**Request for Findings of Fact and
Conclusions of Law**

Charles Dustin Myers,

Respondent

March 26, 2024

Respondent, Charles Dustin Myers, requests the Court to state in writing the findings of fact and conclusions of law as provided by rules 296 and 297 of the Texas Rules of Civil Procedure and section 6.711 of the Texas Family Code with respect to the Temporary Orders signed on March 14th, 2024.

Without limitation, Respondent requests that the Court's findings and conclusions include the characterization and value of all assets, liabilities, claims, and offsets on which disputed evidence has been presented.

Respondent further requests that the clerk of the Court immediately call this request to the attention of the Court pursuant to rule 296 of the Texas Rules of Civil Procedure.

¹ 322-744538-23 - Protective Order filed December 22nd, 2023 | Consolidated with cause# 322-744263-23 on January 16th, 2024.

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Respondent further requests that the Court cause copies of its findings and conclusions to be transmitted to each party in the suit as required by rule 297 of the Texas Rules of Civil Procedure.

Respectfully submitted,

/s/ Charles Dustin Myers

Charles Dustin Myers, Respondent

Charles Dustin Myers

Chuckdustin12@gmail.com

[REDACTED], [REDACTED], TX [REDACTED]

817-507-6562

MR 18.2



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Certificate of Service

I certify that a true copy of this Request for Findings of Fact and Conclusions of Law was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on **2024-03-26**:

Cooper L. Carter by email at **COOPERCARTER@MAJADMIN.COM**

Charles Dustin Myers
Respondent, Pro Se

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Filing Code Description: Request

Filing Description: Request for Findings of Fact and Conclusions of Law

Status as of 3/27/2024 7:23 AM CST

Associated Case Party: MORGANMICHELLEMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------------|-----------|---------------------------|----------------------|--------|
| MORGAN MICHELLEMYERS | | morganmw02@gmail.com | 3/26/2024 5:15:46 PM | SENT |
| Cooper L.Carter | | coopercarter@majadmin.com | 3/26/2024 5:15:46 PM | SENT |

Associated Case Party: CHARLESDUSTINMYERS

| Name | BarNumber | Email | TimestampSubmitted | Status |
|---------------|-----------|-------------------------|----------------------|--------|
| CHARLES MYERS | | chuckdustin12@gmail.com | 3/26/2024 5:15:46 PM | SENT |

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TAB 19
MOTION TO COMPEL
DISCOVERY

11.15.24

MR 19

NO. 322-744263-23 & NO. 322-744538-23

In the Matter of the Marriage of
Morgan Michelle Myers & Charles Dustin Myers
and in the Interest of
M.E.M & C.R.M,
Minor Children.

MOTION TO COMPEL DISCOVERY

In the 322nd District Court.

Tarrant County, Texas

Respectfully submitted,

Charles Dustin Myers

MR 19.1

RESPONDENT'S FIRST REQUEST FOR PRODUCTION & ADMISSIONS

1. Respondent, CHARLES DUSTIN MYERS, asks the Court to compel Petitioner, MORGAN MICHELLE MYERS, through her attorney of record, to produce the documents requested in Respondent's First Request for Production, Documents, and Admissions filed on 9/19/24.

2. Petitioner, MORGAN MICHELLE MYERS, has failed to timely object or respond to the requested admissions. Thus, they are deemed admitted under Texas Law. Tex.R.Civ.P. 198.2(c); see *Nguyen v. Nguyen*, No. 02-20-00070-CV, 23 (Tex. App. Aug. 26, 2021).

I. INTRODUCTION

3. On September 19, 2024, Respondent served Petitioner with his First Request for Disclosure, Production, and Admissions pursuant to Rule 190.3 of the Texas Rules of Civil Procedure. This request was made under the Level 2 Discovery Control Plan, with the discovery period ending thirty days prior to the final trial date.

4. The Respondent's First Request for Disclosure, Production, and Admissions requested essential information and documents, which Petitioner is legally obligated to

provide. A true and correct copy of this request is attached to this Motion as Exhibit A.

5. Despite the statutory requirement under 198.2(a) of the Texas Rules of Civil Procedure, Petitioner has failed to respond or object to these requests in a timely manner. As such, Respondent now seeks an Order from this Court to compel Petitioner to comply with discovery obligations under the Texas Rules of Civil Procedure.

II. FACTUAL BACKGROUND

6. On December 15, 2023, Petitioner defrauded the marital estate by transferring \$1,576 to a third party without Respondent's consent the week of Christmas, which resulted in the marital account being overdrawn by \$800. Respondent specifically requested Petitioner to admit or deny this fact in **Request for Admission No. 3**, which states:

"Admit or deny that Petitioner transferred \$1,576 to Daniel Branthoover's PayPal account on December 15, 2023, which resulted in the marital bank account being overdrawn by \$-800."

Petitioner's failure to respond to this admission request within the statutory time period should result in it being

deemed admitted under **Tex. R. Civ. P. 198.2(c)**. This admission is critical to Respondent's claim that Petitioner mishandled marital funds and defrauded the marital estate.

7. On December 15, 2023, Petitioner allegedly influenced her grandparents to serve an eviction notice on Respondent, citing a protective order and divorce petition that had not yet been filed. This is addressed in **Request for Admission No. 5**, which states:

"Admit or deny that over the weekend of December 15, 2023, Petitioner influenced her grandparents to serve an eviction notice to Respondent, citing a protective order and divorce petition that had not yet been filed."

Petitioner's lack of response to this admission request should result in it being deemed admitted, supporting Respondent's claim that the eviction notice was based on misleading or premature grounds.

8. On March 14, 2024, Petitioner, through her attorney, served Respondent with temporary orders. These orders included Respondent's alleged consent, as evidenced by his signature. However, Respondent disputes this alleged consent and the validity of these orders, as noted in **Request for Admission No. 13**, which states:

"Admit or deny that the Respondent has abided by the current temporary orders in place to the best of his ability, and that the child support calculations, the child custody arrangements, and the current injunctions in place have no legal or factual foundation."

By failing to respond to this admission request, Petitioner has effectively admitted that the temporary orders and related arrangements lack a legal or factual basis. This deemed admission supports Respondent's challenge to the validity of these orders.

9. Petitioner's Original Petition for Divorce, filed on December 18, 2023, allegedly contains false and misleading statements regarding family violence and the existence of an active protective order. Respondent addressed this allegation in **Request for Admission No. 6**, which states:

"Admit or deny that on December 18, 2023, the Original Petition for Divorce filed by Petitioner contains false and misleading statements regarding family violence and an active order of protection."

Petitioner's failure to respond to this admission request should lead to this fact being deemed admitted, supporting Respondent's assertion that the Original Petition for Divorce was filed with false claims.

10. Similarly, Petitioner's Protective Order filed on December 22, 2023, allegedly included additional claims of family violence without any active protective order in place during the marriage. This is addressed in **Request for Admission No. 7**, which states:

"Admit or deny that on December 22, 2023, the Original Protective Order filed by Petitioner contained additional claims of family violence, and at the time of filing, no active order of protection existed, and no such order has existed throughout the marriage."

By not responding to this request, Petitioner has effectively admitted that no active protective order existed during the marriage, thus supporting Respondent's position that the protective order contains unfounded claims.

11. During the marriage, Petitioner directly benefited from and was aware of Respondent's work-from-home business until his removal from the residence on January 16, 2024. This is addressed in **Request for Admission No. 10**, which states:

"Admit or deny that during the marriage, Petitioner directly benefitted from and was aware of Respondent's work-from-home business up until his removal on January 16, 2024."

Petitioner's failure to respond should result in this fact being deemed admitted, supporting Respondent's claim that Petitioner had full knowledge of and benefited from his business operations during the marriage.

III. CONCLUSION

Each of these facts corresponds directly to a specific **Request for Admission** that Petitioner failed to respond to within the statutory time period. As such, Respondent requests that these facts be deemed admitted by the Court under **Tex. R. Civ. P. 198.2(c)**, as they establish a basis for Respondent's claims regarding misuse of marital assets, false statements in legal filings, and improper issuance of temporary orders.

IV. PRAYER

Respondent prays that the court:

1. Order the Petitioner, MORGAN MICHELLE MYERS, to produce the requested documents outlined in the first request for discovery, production, and admissions to Respondent, CHARLES DUSTIN MYERS and deem all admissions as admitted.

2. Order any further relief the court deems
equitable and proper.

Respectfully submitted,

/s/ Charles Dustin Myers

CHARLES DUSTIN MYERS

Chuckdustin12@gmail.com

817-507-6562

6641 Anne Court

Watauga, TX 76148

CERTIFICATE OF SERVICE

I, CHARLES DUSTIN MYERS, certify that a true copy of this MOTION TO COMPEL DISCOVERY and all exhibits were served in accordance with Rule 21a of the Texas Rules of Civil Procedure on the following on
11/15/24:

Cooper L. Carter (Counsel for real party in interest)
by EMAIL/ESERVE at COOPERCARTER@MAJADMIN.COM

Morgan Michelle Myers (real party in interest)
by EMAIL/ESERVE at MORGANMW02@GMAIL.COM

Holly L. Hayes, Texas Office of the Attorney General
By EMAIL/ESERVE at 914-filer@texas.oag.gov

/s/ Charles Dustin Myers
Charles Dustin Myers
Chuckdustin12@gmail.com
6641 Anne Court
Watauga, TX 76148
Tel: 1-817-507-6562
Pro-se

EXHIBIT A

MR 19.10

NO. 322-744263-23
IN THE 322ND DISTRICT COURT OF TARRANT COUNTY,
TEXAS

Morgan Michelle Myers,

Petitioner,

v.

RESPONDENT'S FIRST REQUEST
FOR DISCLOSURE, PRODUCTION,
AND ADMISSIONS

Charles Dustin Myers,

Respondent

2024-09-19

Respondent formally requests the forthcoming discovery materials pursuant to the level 2 discovery control plan. Given that this is the first request for discovery in this suit, the discovery period ends thirty days prior to the date of the final trial pursuant to Rule 190.3 of the Texas Rules of Civil Procedure.

I. Respondent's Request for Disclosure

A. Under Subchapter B, Chapter 301, Family Code, Section Pursuant to Sec. 301.051 and Sec. 301.052 of the Texas Family Code, Respondent formally requests that Petitioner disclose, not later than 30 days after the date of service of this request, the following information and material described pursuant to Section 301.052 of the Texas Family Code:

1. The correct names of the parties to the action.
(Sec. 301.052(a)(1))

2. The name, address, and telephone number of any potential parties.
(Sec. 301.052(a)(2))
3. The legal theories and, in general, the factual bases of the Petitioner's claims or defenses.
(Sec. 301.052(a)(3))
4. The name, address, and telephone number of any person having knowledge of relevant facts and a brief statement of each identified person's connection with the action.
(Sec. 301.052(a)(5))
5. Any discoverable settlement agreement described by Rule 192.3(g), Texas Rules of Civil Procedure.
(Sec. 301.052(a)(7))
6. The name, address, and telephone number of any person who may be designated as a responsible third party. *(Sec. 301.052(a)(11))*

II. Respondent's Request for Production

B. Pursuant to Rule 196 of the Texas Rules of Civil Procedure,

Respondent formally requests that Petitioner produce the following documents within 30 days of service of this request. The documents should be made available and filed with the E-filing system prior to 5:00 P.M. on **10/19/2024**:

1. All bank statements from December 2023 through September 2024 regarding the bank account solely in Petitioner's name.
2. A certificate of completion regarding the "Children in the Middle" parenting course, which was due on May 5th, 2024, or in the alternative – a written statement explaining the reasons for not having the certificate of completion.
3. Receipt of rent payment for the last six months made by the Petitioner in regard to 6641 Anne Court, Watauga TX, 76148.
4. All documents related to the children's healthcare, dental care, or any attempts to acquire healthcare and dental care for the children.
5. Current employer and address, date of employment, and average hours per week worked.

6. A list of all any exhibits that are to be presented at the final trial that have not been served to the Respondent under Rule 21a of the Texas rule of Civil Procedure.

7. The names, addresses, and telephone numbers of all witnesses expected to testify at trial.

8. The names, addresses, and telephone numbers of all persons who care for the minor children on a regular basis, the times of day the children are in their care, and for what purpose, and the cost of care, if any.

III. Respondent's Request for Admissions

C. Pursuant to Rule 198.1 of the Texas Rules of Civil Procedure,

Respondent **Charles Dustin Myers** requests that Petitioner **Morgan Michelle Myers** admit or deny the following statements within the scope of discovery.

Each admission or denial must be provided within **30 days** of service of this request. Failure to respond in a timely manner may result in the admissions being deemed admitted by the Court and a motion to compel to follow. For each denial, if any, Petitioner must provide a full explanation of the basis for the denial, along with any supporting facts, evidence, or documentation substantiating the denial:

1. Admit or deny that between July 2015 and January 16, 2024, Respondent resided at the residence located at 6641 Anne Court, Watauga, TX 76148, with Petitioner. _____.

If denied, provide the factual basis for the denial and any supporting documentation or proof of other residences during that time period.

Response:

2. Admit or deny that on **January 26, 2021**, Respondent made an employment switch to work from home, which contributed to the **financial stability** of the family leading up to **January 16, 2024**. _____.

If denied, provide an explanation and any financial records or employment information to support the denial.

Response:

3. Admit or deny that Petitioner transferred **\$1,576** to **Daniel Branthroover's PayPal account** on **December 15, 2023**, which resulted in the marital bank account being overdrawn by **\$-800**. _____.

If denied, provide all facts, bank records, and other evidence supporting the denial.

Response:

4. Admit or deny that over the weekend of **December 15, 2023**, Petitioner took the children to Oklahoma where she received assistance **from Daniel Branthroover** in filing the divorce paperwork. _____.

If denied, explain the purpose of the trip, the role of Daniel Branthroover, and provide relevant documents or correspondence regarding the trip.

Response:

5. Admit or deny that over the weekend of **December 15, 2023**, Petitioner influenced her grandparents to serve an **eviction notice** to Respondent, citing a protective order and divorce petition that had not yet been filed. _____.

If denied, provide all facts and any documents relating to the eviction notice and its justification, including communications with Petitioner's grandparents.

Response:

6. Admit or deny that on **December 18, 2023**, the **Original Petition for Divorce** filed by Petitioner contains **false and misleading statements** regarding family violence and an active order of protection. _____.

If denied, provide the factual basis for the accuracy of the statements made in the Original Petition for Divorce.

Response:

7. Admit or deny that on **December 22, 2023**, the **Original Protective Order** filed by Petitioner contained additional claims of family violence, and at the time of filing, **no active order of protection** existed, and no such order has existed throughout the marriage. _____.

If denied, provide the factual basis for any claims that an active protective order was in place during the marriage and during the filing of the protective order.

Response:

8. Admit or deny that on **March 6, 2024**, during Petitioner's visitation with the children, while Respondent was walking the children to school, Petitioner ran inside the family residence and locked the Respondent out.

_____.

If denied, provide an explanation and any evidence contradicting this event, including witness statements or other documentation.

Response:

9. Admit or deny that during the course of these proceedings following March 14th, 2024, Petitioner has made **no claims of abuse, drug use, or any concerns of violence or threat of violence** made by Respondent aimed at the Petitioner and has not served any documents related to the above to the Respondent during the pendency of the case through her attorney of record.

_____.

If denied, provide all documents, pleadings, or correspondence where such claims have been raised, filed, or served.

Response:

10. Admit or deny that during the marriage, Petitioner directly benefitted from and was aware of Respondent's **work-from-home business** up until his removal on January 16th, 2024. _____.

If denied, provide a full explanation and any financial documents or records to support the denial.

Response:

11. **Admit or deny** that during the pendency of the case, Petitioner is aware that Respondent has lived in **several different locations**, seeking relief from ongoing damages caused by the removal of his home. _____.

If denied, provide an explanation and all relevant documents supporting the denial.

Response:

12. **Admit or deny** that the Petitioner has made no meaningful effort to ensure that the Children's status quo is preserved during the pendency of the case. _____.

If denied, provide an explanation and all relevant documents supporting the denial.

Response:

13. **Admit or deny** that the Respondent has abided by the current temporary orders in place to the best of his ability, and that the child support calculations, the child custody arrangements, and the current injunctions in place have no legal or factual foundation.

If denied, provide an explanation and all relevant documents that can be found on the clerk's record supporting the denial and supporting the current arrangements.

Response:

IV. Time for Compliance and Filing Instructions

D. Petitioner is hereby reminded that all responses to this Request for Disclosure, Discovery, and Admissions, along with any requested documents, must be provided no later than 30 days after the date of service of this request. All documents and materials must be filed using the Electronic Filing Manager under the "**service only**" option and served on the Respondent. Failure to respond in a timely manner may result in the filing of a **Motion to Compel**, and any objections to the requests for admissions being deemed waived and the matters admitted by the Court.

- Please note that as of the time of this request, there are no formal pending settings that have been properly served on the Respondent pursuant to Texas Rules of Civil Procedure Rule 21a.

Respectfully submitted,

/s/ Charles Dustin Myers
Charles Dustin Myers
6641 Anne Court
Watauga, TX 76148
chuckdustin12@gmail.com
817-507-6562

CERTIFICATE OF SERVICE

Respondent hereby certifies that on **09/19/2024**, a true and correct copy of the **Respondent's First Request for Disclosure, Discovery, and Admissions** was served on the following parties via **electronic service through the Electronic Filing Manager (EFM)** and via **email** to the email address on record, pursuant to **Texas Rules of Civil Procedure 21a and 191.4**.

Served to:

- **Morgan Michelle Myers**, Petitioner via electronic filing system.
- **Cooper Carter**, Counsel for Petitioner via electronic filing system.
- **Email Addresses for Service:**
coopercarter@majadmin.com & morganmw02@gmail.com

Service was made using the "service only" option via the **Electronic Filing Manager** and was also served via email to Respondent's email address:
chuckdustin12@gmail.com.

/s/ Charles Dustin Myers
Charles Dustin Myers
6641 Anne Court
Watauga, TX 76148
chuckdustin12@gmail.com
817-507-6562

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: 94352460

Filing Code Description: Motion (No Fee)

Filing Description: Motion to Compel Discovery

Status as of 11/15/2024 3:25 PM CST

Case Contacts

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------------|-----------|--|-----------------------|--------|
| CHARLES MYERS | | chuckdustin12@gmail.com | 11/15/2024 1:55:22 PM | SENT |
| MORGAN MICHELLEMYERS | | morganmw02@gmail.com | 11/15/2024 1:55:22 PM | SENT |
| Cooper L.Carter | | coopercarter@majadmin.com | 11/15/2024 1:55:22 PM | SENT |
| HOLLY HAYES | | csd-filer-914@texasattorneygeneral.gov | 11/15/2024 1:55:22 PM | SENT |

CERTIFICATE OF SERVICE

Relator certifies that on April 14, 2025, a true and correct copy of the foregoing Petition for Writ of Mandamus was served on all parties and counsel of record as follows:

Respondent

Hon. Jeff Kaitcer
Associate Judge, 322nd District
Court Tarrant County Family Law
Center 200 E. Weatherford St. 4th
Floor Fort Worth, TX 76196
817-884-1888

Via electronic submission to the court coordinator

Via email: LKBaker@tarrantcountytexas.gov

COUNSEL FOR REAL PARTY IN INTEREST

Cooper L. Carter
Marx, Altman & Johnson
2905 Lackland Road
Fort Worth, TX 76116
cooper.carter@majadmin.com

Real Party In Interest

Morgan Michelle Myers
Real Party in Interest
MORGANMW02@GMAIL.COM

INTERVENOR

Holly Hayes
2001 Beach St
Fort Worth, TX 76103-2308
817-459-6878
CSD-Legal-914@oag.texas.gov
TEXAS O.A.G.

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:

Envelope ID: 100310746

Filing Code Description: Petition

Filing Description: Petition for Writ of Mandamus

Status as of 5/1/2025 8:49 AM CST

Case Contacts

| Name | BarNumber | Email | TimestampSubmitted | Status |
|----------------|-----------|-------------------------|---------------------|--------|
| CHARLES DMYERS | | CHUCKDUSTIN12@GMAIL.COM | 5/1/2025 8:36:20 AM | SENT |