

NO. 322-744263-23**IN THE MATTER OF
THE MARRIAGE OF****MORGAN MYERS
AND
CHARLES MYERS****AND IN THE INTEREST OF
MARA MYERS AND CAROLINE
MYERS, CHILDREN****§ IN THE DISTRICT COURT****§****§****§****§****§****§****322ND JUDICIAL DISTRICT****TARRANT COUNTY, TEXAS****SECOND AMENDED PETITION FOR DIVORCE****1. *Discovery***

Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure.

Preservation of Evidence: Respondent is put on notice to preserve and not destroy, conceal, or alter any evidence or potential evidence relevant to the issues in this case, including tangible documents or items in Respondent's possession or subject to Respondent's control and electronic documents, files, or other data generated by or stored on Respondent's home computer, work computer, storage media, portable systems, electronic devices, online repositories, or cell phone.

2. *Parties*

This suit is brought by MORGAN MYERS, Petitioner. The last three numbers of MORGAN MYERS's Social Security number are 893.

CHARLES MYERS is Respondent.

3. *Domicile*

Petitioner has been a domiciliary of Texas for the preceding six-month period and a

resident of this county for the preceding ninety-day period.

4. *Service*

No service on Respondent is necessary at this time.

5. *Protective Order Statement*

No protective order under title 4 of the Texas Family Code, protective order under subchapter A of chapter 7B of the Texas Code of Criminal Procedure, or order for emergency protection under Article 17.292 of the Texas Code of Criminal Procedure is in effect in regard to a party to this suit or a child of a party to this suit and no application for any such order is pending.

6. *Birth Certificates*

Certified copies of the children's birth certificates are not available to Petitioner.

7. *Dates of Marriage and Separation*

The parties were married on or about JUNE 20, 2015 and ceased to live together as spouses on or about JANUARY 16, 2024.

8. *Grounds for Divorce*

The marriage has become insupportable because of discord or conflict of personalities between Petitioner and Respondent that destroys the legitimate ends of the marriage relationship and prevents any reasonable expectation of reconciliation.

9. *Children of the Marriage*

Petitioner and Respondent are parents of the following children of this marriage who are not under the continuing jurisdiction of any other court:

Name: MARA MYERS

Sex: FEMALE

Birth date: 06/20/2016

Name: CAROLINE MYERS

Sex: FEMALE

Birth date: 04/12/2018

There are no court-ordered conservatorships, court-ordered guardianships, or other court-ordered relationships affecting the children the subject of this suit.

Information required by section 154.181(b) and section 154.1815 of the Texas Family Code will be provided at a later date.

No property of consequence is owned or possessed by the children the subject of this suit.

The appointment of Petitioner and Respondent as joint managing conservators would not be in the best interest of the children. Petitioner, on final hearing, should be appointed sole managing conservator, with all the rights and duties of a parent sole managing conservator, and Respondent should be ordered to provide support for the children, including the payment of child support and medical and dental support in the manner specified by the Court. Petitioner requests that the payments for the support of the children survive the death of Respondent and become the obligation of Respondent's estate. There should be no restriction on the geographic area within which Petitioner may designate the primary residence of the children. Alternatively, if the primary residence of the children is restricted to a geographic area, that area should include Tarrant County, Texas and counties contiguous to Tarrant County, Texas.

Preceding the filing of this suit, Respondent has engaged in a history or pattern of family violence, as defined by section 71.004 of the Texas Family Code.

Preceding the filing of this suit, Respondent has engaged in a history or pattern of child abuse and child neglect.

Petitioner requests that the Court consider this conduct in appointing Petitioner as sole managing conservator or the parties as joint managing conservators.

Petitioner requests the Court to order reasonable periods of electronic communication between the children and Petitioner to supplement Petitioner's periods of possession of and access to the children.

Respondent has a history or pattern of committing family violence during the two-year period preceding the date of filing of this suit. Petitioner requests the Court to deny Respondent access to the children. Alternatively, if the Court finds that awarding Respondent access to the children would not endanger the children's physical health or emotional welfare and would be in the best interest of the children, Petitioner requests that the Court render a possession order that is designed to protect the safety and well-being of the children and any other person who has been a victim of family violence committed by Respondent, including but not limited to ordering that the periods of access be continuously supervised by an entity or person chosen by the Court, ordering that the exchange of possession of or access to the children occur in a protective setting, ordering Respondent to refrain from the consumption of alcohol or a controlled substance within the twelve hours before or during each of Respondent's periods of possession of or access to the children, and ordering Respondent to attend and complete a battering intervention and prevention program or, if such a program is not available, to complete a course of treatment with a mental health professional in accordance with section 153.010 of the Texas Family Code.

There is a history or pattern of child abuse, child neglect, and family violence committed by Respondent. Petitioner requests the Court to deny Respondent access to the children. Alternatively, Petitioner requests that the Court render a possession order that provides that Respondent's periods of visitation be continuously supervised by an entity or person chosen by

the Court.

Petitioner also requests that the child support owed by Respondent be confirmed at final trial.

10. Division of Community Property

Petitioner believes Petitioner and Respondent will enter into an agreement for the division of their estate. If such an agreement is made, Petitioner requests the Court to approve the agreement and divide their estate in a manner consistent with the agreement. If such an agreement is not made, Petitioner requests the Court to divide their estate in a manner that the Court deems just and right, as provided by law.

Petitioner should be awarded a disproportionate share of the parties' estate for the following reasons, including but not limited to:

- a. fault in the breakup of the marriage;
- b. benefits the innocent spouse may have derived from the continuation of the marriage;
- c. disparity of earning power of the spouses and their ability to support themselves;
- d. health of the spouses;
- e. the spouse to whom conservatorship of the children is granted;
- f. needs of the children of the marriage;
- g. education and future employability of the spouses;
- h. community indebtedness and liabilities;
- i. ages of the spouses;
- j. earning power, business opportunities, capacities, and abilities of the spouses;
- k. need for future support;
- l. nature of the property involved in the division; and

m. attorney's fees to be paid.

11. Separate Property

Petitioner owns certain separate property that is not part of the community estate of the parties, and Petitioner requests the Court to confirm that separate property as Petitioner's separate property and estate.

12. Request for Permanent Injunction

Petitioner requests the Court, after trial on the merits, to grant the following permanent injunction:

a. Petitioner requests that her contact information and residence information remain confidential.

13. Request for Change of Name

Petitioner requests a change of name to MORGAN MICHELLE WILSON.

14. Attorney's Fees, Court Costs, Expenses, and Interest

It was necessary for Petitioner to secure the services of Cooper L. Carter, a licensed attorney, to prepare and prosecute this suit. To effect an equitable division of the estate of the parties and as a part of the division, and for services rendered in connection with conservatorship and support of the children, judgment for reasonable and necessary attorney's fees, court costs, and expenses through trial and appeal should be granted against Respondent and in favor of Petitioner for the use and benefit of Petitioner's attorney and be ordered paid directly to Petitioner's attorney, who may enforce the judgment in the attorney's own name. Petitioner requests postjudgment interest as allowed by law.

Petitioner also requests that the previous attorney's fees awarded to her during this case be confirmed at final trial.

15. Prayer

Petitioner prays that citation and notice issue as required by law and that the Court grant a divorce and all other relief requested in this petition.

Petitioner prays that, on final hearing, the Court enter a permanent injunction enjoining Respondent, in conformity with the allegations of this petition, from the acts set forth above.

Petitioner prays that Petitioner's name be changed as requested above.

Petitioner prays for attorney's fees, court costs, and expenses as requested above.

Petitioner prays for general relief.

Respectfully submitted,

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By: /s/ Cooper L. Carter

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Roderick Marx on behalf of Cooper Carter

Bar No. 24121530

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Filing Description: SECOND AMENDED PETITION FOR DIVORCE

Status as of 11/25/2025 10:30 AM CST

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