



### **CONSERVATORSHIP**

7. Because the parents of the child are separated, the Court should appoint appropriate conservators pursuant to Texas Family Code § 153.005.

### **NAME CHANGE**

8. The Court should consider whether good cause exists to change the surname of the minor child to reflect parentage, if established, and enter an order concerning the name of the child pursuant to Texas Family Code Chapter 160.

### **SUPPORT**

9. The Court should order appropriate current and retroactive child and medical support for the child, including temporary support pursuant to Texas Family Code §§ 160.624 and 105.001. In determining the amount of retroactive support the Court should consider the duty of parents to support their minor child, and all applicable provisions of the Texas Family Code. In addition, the Court should order medical support, including any employment-related or other group health insurance that is available to the parent.

### **WITHHOLDING FROM EARNINGS FOR SUPPORT**

10. The Court should order all support withheld from disposable earnings pursuant to Texas Family Code § 158.006. The Court should order all payments of support processed pursuant to Texas Family Code Chapter 231 for distribution according to law. If appropriate, the Court should order *MATTHEW DEWAYNE PORTER* to post a bond or security.

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

11. *MATTHEW DEWAYNE PORTER* has in his possession documents that will show the nature and extent of his ability to pay child support. The OFFICE OF THE ATTORNEY GENERAL, pursuant to Rule 196, Texas Rules of Civil Procedure, requests him to produce and permit the OFFICE OF THE ATTORNEY GENERAL to inspect and copy the originals, or true copies, of the following documents in his possession, custody or control: (a) his IRS federal tax returns for the past two years with all schedules included with the returns and all W-2s and 1099s attached to such returns, (b) any and all W-2 statements, all 1099s, and all documents showing income received by Respondent from any source for the two tax years preceding the date of filing of this action, (c) all payroll stubs, vouchers, records of commissions and all other written records or evidence of income received by him within the last six months, (d) the most recent Social Security Administration Form SSA-7005, showing his income history, sent to him three months before his last birthday, (e) statements of accounts for all checking or saving accounts in which he has held an interest within the last six months, (f) all evidence (policies, premium schedules, records of premiums paid, etc.) of health insurance available at his place of employment that may provide coverage for dependent children, (g) copies of loan applications made within the last six months, (h) current statement of benefits and account balances for all retirement, pension, or profit-sharing plans in which the respondent has accrued or may accrue benefits, regardless if such benefits have vested, including but not limited to employer- or union-sponsored defined benefit or defined contribution plans and individual retirement accounts (IRAs), and (i) summary plan description of all retirement, pension, or profit-sharing plans in which the respondent has accrued or may accrue benefits, regardless if such benefits have vested. The OFFICE OF THE ATTORNEY GENERAL requests production of the specified documents at:

The Office of the Attorney General  
CHILD SUPPORT OFFICE  
2001 BEACH ST STE 800  
FT WORTH, TX 76103-2300

on or before 3:00 p.m. on the 50th day following the date of service of this request.

## **COSTS**

12. The Court should order *MATTHEW DEWAYNE PORTER* to pay costs of this proceeding.

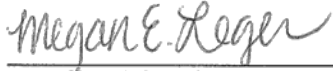
## **PRAYER**

The OFFICE OF THE ATTORNEY GENERAL prays that the Court grant all relief requested herein. The OFFICE OF THE ATTORNEY GENERAL prays for general relief.

Respectfully submitted,

Ken Paxton  
Attorney General of Texas

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