

Rebecca Keaton

IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA Court Rule: www.cobb.superiorcourtclerk.com
Rebecca Keaton
Clerk of Superior Court Cobb County

RENATA WHITE JACKSON,)	
)	
PLAINTIFF,)	
)	
v.)	CIVIL ACTION
)	FILE NO. 13-1-6248-53
STEPHEN JACKSON,)	
)	
DEFENDANT.)	

MOTION FOR CONTEMPT OF STANDING ORDER

COMES NOW, RENATA WHITE JACKSON, Plaintiff in the above-styled matter, and files this her Motion for Contempt against Defendant, STEPHEN JACKSON, and shows this Honorable Court the following:

1.

Plaintiff herein filed a Complaint for Divorce and Other Relief on or about July 18, 2013.

2.

Defendant herein filed an Answer to Complaint for Divorce on or about August 15, 2013.

3.

In conjunction with Plaintiff's Complaint for Divorce, the Domestic Relations Standing Order issued.

4.

Paragraph 3 of said Domestic Relations Standing Order states as follows:

"You shall not sell, encumber, trade, contract to sell, or otherwise dispose of or remove from the jurisdiction of the court, without the permission of the court, any of the property belonging to the Parties except in the ordinary course of business or except in an emergency which has been created by the other Party to the action. You shall not disconnect or cause to be disconnected any utility-providing service to the home of the other Party. You shall not

change, cause to change, cancel, or cause the cancellation of any insurance presently in effect which protects the Parties or any of their children or property. You shall not interfere with the other Party's mail."

5.

Upon information and belief, Plaintiff shows that Defendant has willfully failed and refused to abide by the terms and conditions of the Domestic Relations Standing Order in that he liquidated and transferred marital assets on at least the following occasions:

(a) Defendant unilaterally, and without the knowledge or consent of Plaintiff, obtained the key to Plaintiff's Bentley from Plaintiff's kitchen drawer, and then sold that automobile on or about October 9, 2014. A true and correct copy of a text message from Defendant to Plaintiff confirming same is attached hereto as Exhibit "A" and incorporated herein by reference.

(b) Defendant's counsel notified the undersigned counsel on November 11, 2014 that Defendant no longer had any assets, as he had to liquidate same to pay his existing child support obligations; and

(c) Defendant, through text message correspondence in or around September, 2014, notified Plaintiff that he would "spend it all before I let u take it...." A true and correct copy of that text message is attached hereto as Exhibit "B" and incorporated herein by reference.

6.

Upon information and belief, Defendant is dissipating and transferring marital assets to the detriment of the Plaintiff.

7.

Plaintiff shows that the Defendant's failure to comply with the terms and conditions of the Domestic Relations Standing Order was willful and intentional, notwithstanding his ability to comply, and Defendant should be found to be in willful contempt of this Court.

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8.

Plaintiff shows that she should be awarded attorney's fees and expenses in this action due to Defendant's willful refusal to abide by the terms and conditions of said Domestic Relations Standing Order.


WHEREFORE, Plaintiff respectfully prays as follows:

- (a) That Defendant be served with a copy of this Motion for Contempt of Standing Order;
- (b) That a Rule Nisi issue requiring Defendant to appear and show cause as to why the prayers of Plaintiff's Motion for Contempt of Standing Order should not be granted;
- (c) That Defendant be ordered to immediately pay back to Plaintiff all proceeds received by Defendant from his unilateral sale of Plaintiff's automobile;
- (d) That Defendant be required to pay to Plaintiff reasonable attorney's fees and expenses of litigation incurred in connection with this Motion;
- (e) That Defendant be required to maintain the status quo during the litigation;
- (f) That Defendant be incarcerated in the common jail of Cobb County until such time as he has purged himself of his contempt; and
- (g) That this Court award Plaintiff any and all other relief that is just and proper under the circumstances.

(Signature continued on next page)

This 12th day of November, 2014.

ELOVITZ/O'NAN, LLC


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