

IN THE MATTER OF THE MARRIAGE OF

Petitioner,
and

Respondent.

Cause No. _____
In the County Court of
EL PASO COUNTY, TEXAS

MOTION FOR TEMPORARY ORDERS

_____, Petitioner in the captioned cause, requests that the Court render a temporary order pending the final decree in this cause, and in support of such request shows the following:

I. Parties and Jurisdiction

_____ filed a petition in the captioned cause for dissolution of the marriage with _____. This Court has jurisdiction of the suit in all respects and the residence requirement has been met.

II. Request for Temporary Injunction

_____, Petitioner, requests that the Court dispense with the requirement of a bond pursuant to the Texas Family Code and the Texas Rules of Civil Procedure and order _____, upon notice and hearing, enjoined pending the further orders of the Court from:

1. Intentionally misrepresenting or refusing to disclose to _____ or to the Court, on proper request, the existence, amount, or location of any property of the parties, or either of them.
2. Intentionally or knowingly damaging, destroying, or tampering with the tangible property of the parties, or either of them, including any document that represents or embodies anything of value.
3. Incurring any indebtedness, other than legal expenses in connection with this suit, except as specifically authorized by order of this Court.
4. Making withdrawals from any checking or savings account in any financial institution for any purpose, except as specifically authorized by order of this Court.
5. Spending any sum of cash in _____, Respondent's possession or subject to _____, Respondent's control for any purpose, except as specifically authorized by order of this Court.
6. Withdrawing or borrowing in any manner all or any part of the cash surrender value of life insurance policies on the life of _____, Petitioner or _____, Respondent.
7. Changing or in any manner altering the beneficiary designation on any life insurance on the life of _____, Petitioner or _____, Respondent.
8. Canceling, altering, or in any manner affecting any casualty, automobile, or health insurance policies insuring the parties' property or persons.

9. Terminating or in any manner affecting the service of water, electricity, gas, telephone, cable television, or other contractual service, such as security, pest control, or yard maintenance, at _____ or in any manner attempting to withdraw any deposits for service in connection with such services.

10. Intentionally excluding _____ from the use and enjoyment of _____ residence.

11. Opening or diverting mail addressed to _____.

12. Signing or endorsing _____ name on any negotiable instrument, check, or draft, such as tax refunds, insurance payments, and dividends, or attempting to negotiate any negotiable instrument payable to _____ without the personal signature of _____.

13. Instituting any action in any other county, state, or nation attempting to obtain temporary or permanent orders concerning the marriage relationship of the parties, the dissolution of that relationship, spousal support, or any other order normally issued incident to a divorce proceeding or other proceeding involving the marital relationship.

_____ requests that _____, Respondent, be authorized only as follows:

1. To engage in acts reasonable and necessary to the conduct of _____, Respondent's usual business and occupation.

2. To make expenditures and incur indebtedness for reasonable expenses in connection with this lawsuit.

3. To make expenditures and incur indebtedness for reasonable and necessary living expenses for food, clothing, shelter, transportation, and medical care.

