

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

PLAINTIFFS

AND

V. CAUSE NO.

DEFENDANT

PETITION FOR TEMPORARY RESTRAINING ORDER AND PERTINENT INJUNCTION

COME NOW, Plaintiffs, and , and file this their Petition for a Temporary Restraining Order and Permanent Injunction and in support Thereof, would show the following:

- 1. a. is an adult resident citizen of County, Mississippi, whose address is , , Mississippi .
b. is an adult resident citizen of County, Mississippi, whose address is , , Mississippi .
c. is an adult resident citizen of County, Mississippi, whose address is , , Mississippi .
2. During , , ended a relationship with . Subsequent to that time, became engaged to be married to .
3. Since the time that and have become engaged to be married, has knowingly and willfully engaged in a pattern of conduct of threatening and harassing and . Specifically, has had conversations with and made telephone calls to , and employer, during which he/she used abusive and profane language and made threats regarding the safety of . Likewise, has made remarks to individuals who know and indicating that he/she intended to cause bodily harm to . has further made threatening statements to in person.
4. As the proximate and foreseeable result of irrational, hostile, abusive and threatening conduct, and his/her intent and apparent ability to carry out the threats made by him/her to and , and are in fear for their safety.

WHEREFORE, Plaintiffs and request that this Court enter a Temporary Restraining Order against prohibiting him/her from contacting both , , , and employer, , or any employee thereof, by telephone, letter, or by any other means or method of communication and prohibiting him/her from coming to and home and place of business or otherwise coming within five hundred (500)feet of ,

, , , employer, , or any employee thereof.

MOTION FOR PERMANENT INJUNCTION

5. and incorporate herein by reference the allegations contained in Paragraphs 1 through 4 above.

6. and request that the Temporary Restraining Order remain in effect until such time as a hearing can be had on the merits of this cause, at which time and request that a Permanent Injunction be issued prohibiting any contact between the parties on a permanent basis.

WHEREFORE, PREMISES CONSIDERED, and pray for the following relief:

A. A Temporary Restraining Order prohibiting from contacting and and either of their employers; and

B. A Permanent Injunction prohibiting any contact between the parties on a permanent basis; and

C. Other such relief as the Court deems just and equitable.

DATED this the day of , .

Respectfully submitted,

Attorney for

Of counsel:

Telephone:
MSB #
Attorney for

STATE OF MISSISSIPPI
COUNTY OF

Personally appeared before me, the undersigned authority in and for the said county and state, on this day of , , within my jurisdiction, the within named , duly identified before me, who acknowledged that he/she executed the above and foregoing instrument.

NOTARY PUBLIC

My Commission Expires:

STATE OF MISSISSIPPI
COUNTY OF

Personally appeared before me, the undersigned authority in and for the said county and state, on this day of , , within my jurisdiction, the within named , duly identified before me, who acknowledged that he/she executed the above and foregoing instrument.

NOTARY PUBLIC

My Commission Expires:

Of counsel:

Telephone:
MSB #
Attorney for

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day caused to be mailed, via United States Mail postage prepaid, a true and correct copy of the foregoing document to:

_____, Mississippi

DATED this the _____ day of _____, _____.

_____ -