

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VERSUS

CIVIL ACTION NO.

DEFENDANT

MOTION TO CITE PLAINTIFF FOR CONTEMPT OF TEMPORARY JUDGMENT

COMES NOW the Defendant , by and through counsel, who files this his/her Motion to Cite the Plaintiff for Contempt of the Amended Temporary Judgment heretofore entered in this cause and for such would show unto the Court the following, to-wit:

1. That on the day of , 20 , the Honorable , sitting as Special Master in the Chancery Court of County, Mississippi, entered a Report of Special Master after conducting a hearing on the Motion to Modify the Temporary Judgment that had previous to that date been entered in this cause. A true and correct copy of said Report of Special Master is attached hereto as Exhibit " " and is hereby incorporated by reference.

2. That part and parcel of the Special Master's Report, which amended the Temporary Judgment already entered in the cause required the Plaintiff, commencing , 20 , to be responsible for of the monthly house note due and owing against the residence owned by the parties; and to allow the Defendant phone visitation. Also, the Defendant has not had phone visitation for weeks.

4. That the Defendant has exhausted all means of getting the Plaintiff to pay of the house payment and therefore has had to cite the Plaintiff to be in willful contempt of this court.

5. That the actions of the Plaintiff are willful and wanton and shows a disregard for the prior Judgments entered in this cause and this Court should cite his/her to be in willful contempt of court and require him/her to pay of the , 20 house payment directly to the Defendant, as well as all cost of court incurred herein and a reasonable attorney's fee.

6. That the Plaintiff should be required to pay a reasonable attorney's fee unto the Defendant.

WHEREFORE, PREMISES CONSIDERED, the Defendant prays that after a full and complete hearing, this Court would enter its Judgment citing the Plaintiff to be in willful contempt of this Court, and requiring the Plaintiff to pay to the Defendant one/half of the , 20 mortgage payment on the home of the parties, as well as all cost of court incurred to date in this case, as well as reasonable attorney's fee, and further, pray that this Court enforce the phone visitation.

Defendant prays for general relief,

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I, \_\_\_\_\_, do hereby certify that I have this date, hand delivered, a true and correct copy of the above and foregoing to \_\_\_\_\_ at his/her usual office address.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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