

IN THE CHANCERY COURT OF _____, MISSISSIPPI

PLAINTIFF/MOVANT

VS.

CIVIL ACTION NO.

DEFENDANT/RESPONDANT

MOTION FOR CONTEMPT

COMES NOW, _____, through and by his/her attorney, and files with the Court, this his/her Motion for Contempt against _____, and in support thereof would show unto the Court the following, to-wit:

1. That the Final Decree of this Court dated _____, 20____, in this cause granted unto the movant, _____, requiring the respondant, _____; to pay the mortgage payments on the marital domicile until the movant shall become employed full-time which includes escrows and insurance and taxes and late fees in the amount of _____ (\$____) plus late fees.

2. That the respondant was required to reimburse the movant for medical expenses and drug expenses incurred from _____ of 20____ until _____, 20____, in the amount of _____ (\$____).

3. That the respondant is required to reimburse the movant in the

4. That the respondant is required to produce from his/her income tax filings IRS form _____ which was necessary by guidelines set up from the Internal Revenue Service.

5. That the respondant is required to return personal property belonging to the movant, more specifically, his/her _____ diaries from the children of this marriage which have been kept from before the date of their birth.

6. That the respondant is required to pay alimony in the amount of _____ (\$____) to be paid in monthly installments of _____ (\$____) each beginning the _____ day of _____, 20____, with a like payment due' on the _____ of each month thereafter until the same is paid in full.

7. That the said respondant, _____, is willful, obstinate, deliberate and malicious contempt of and for this Court and its said Final Orders and Decrees. That he/she is failed and refuses to pay the mortgage payment on said marital domicile until the movant becomes employed, and the movant has been notified by the mortgage company of their intentions to proceed with foreclosure proceedings against the marital domicile if said mortgage payment have not been brought up-to-date by _____, 20____. That said respondant has refused to reimburse the movant for medical and drug expenses in the amount of _____ (\$____) for repairs made to said _____ automobile, that said respondant has refused to produce IRS Form

from his/her income tax filings for the year 20 , that said respondent has refused to produce certain personal property of the movant, specifically, his/her diaries on the children of the marriage, and that said respondent has refused to make monthly alimony payments in the amount of (\$) per month beginning , 20 . That the movant has made repeated demands on the said defendant, , to pay all of said sums, but these demands have been totally ignored by the said : thereby necessitating movant, , to hire an attorney to bring his/her cause before this Court: therefore, respondent, , should be ordered to pay in addition to the arrearage of monthly mortgage payments, alimony payments, and all other relief requested, a reasonable sum in which to pay his/her attorney for having to acquire his/her services in this regard, particularly since the hiring of said attorney was solely caused by willful, deliberate and malicious disregard for this Court and Its Orders.

8. That the said should be found in contempt of this Court and immediately incarcerated in the County Jail at , Mississippi or otherwise dealt with accordingly. That the movant, , should be awarded a Judgment against the said for the sum in the amount of (\$) in mortgage payments, plus late fees of approximately (\$) a month for the past () months, plus (\$) for medical pay (\$) for repairs made to movant's automobile, plus (\$) in past due alimony payments, for the sum of (\$), together with any additional sum for attorney's fees, court costs, and interest on the above referenced amount. Further, movant, is without funds to pay his/her attorney in the absence of an award from the Court.

9. WHEREFORE, PREMISES CONSIDERED, movant prays that this his/her Motion be filed, that a hearing be held hereupon at the earliest convenient date: that this Court will find in contempt for his/her willful, malicious, obstinate, and deliberate failure to abide by the Final Orders of this Court. That the defendant, , be immediately incarcerated in the County Jail at , Mississippi, or otherwise dealt with accordingly for contempt: that the movant, be granted a Judgment against the defendant, for the sum of (\$), plus attorney's fees, court costs and interest on the above referenced amount. Movant, , prays for other such relief either special or general as he/she may be entitled.

Respectfully submitted,

ATTORNEY FOR PLAINTIFF

STATE OF MISSISSIPPI
COUNTY OF

This day before me the undersigned authority in and for the jurisdiction aforesaid, personally appeared, _____, who after having been by me first duly sworn, states on oath that the matters and facts contained in the above and foregoing Motion for Contempt are true and correct as therein stated, and that all matters and things stated on information and belief, he/she verily believes to be true and correct as therein stated.

SWORN TO AND SUBSCRIBED BEFORE ME, this the _____ day of _____ A.D.,
20____ .

NOTARY PUBLIC

My Commission Expires:

CERTIFICATE OF SERVICE

I, _____, attorney for plaintiff, _____, do hereby certify that I have this day, served a true and correct copy of the above and foregoing Motion for Contempt by United States Mail, postage prepaid, to

WITNESS MY SIGNATURE, this the _____ day of _____ A.D., 20____ .