

IN THE COMMON PLEAS COURT OF MONTGOMERY COUNTY, OHIO

DOMESTIC RELATIONS DIVISION

JOANNA SULLIVAN
1315 Buck Run Rd.
Wilmington, Ohio 45177
DOB: 11/18/1985

*

CASE NO. 2024 DR 0547

*

JUDGE WOOD

*

Plaintiff,

*

vs.

*

BRENDAN SULLIVAN
1199 Durham Drive
Centerville, Ohio 45459
DOB: 02/23/1976

*

MOTION FOR TEMPORARY
RESTRAINING ORDERS

*

Defendant.

Now comes the Defendant, Brendan Sullivan, by and through counsel, and states that the Plaintiff, JoAnna Sullivan will interfere with and damage Defendant's rights and interests unless restrained from doing so, and hereby moves this Court for an Order that restrains the Plaintiff from doing any and all of the following:

1. **Abuse:** abusing, annoying, harassing, molesting, threatening or injury Defendant;
2. **Property:** damaging, moving, selling, giving away, transferring, disposing of, or encumbering any existing or later-acquired interest of either party in any real or personal property, except Plaintiff's clothing, tools of trade, and personal effects;

3. **Vehicle**: interfering with Defendant's use of the vehicle currently used primarily by him;
4. **Funds & Businesses**: selling, giving away, withdrawing, transferring, or encumbering any funds, account, share, stock, bond, or other existing or later-acquired interest of either party in any asset, business, corporation, partnership, employer, pension fund, bank trust, or financial institution, except normal living expenses;
5. **Credit**: incurring any debt or making any credit card purchase in Defendant's name or on any joint account; and
6. **Insurance**: terminating, modifying, or changing the beneficiaries of any life, health, automobile, or other insurance policy covering any party, or otherwise violating O.R.C. Section 3105.71.

Respectfully submitted,

MCNAMEE LAW GROUP, LLC

/s/ Matthew J. Barbato

Matthew J. Barbato (0076058)
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Tel: 937-427-1367
Counsel for Defendant

AFFIDAVIT

STATE OF OHIO

SS:

GREENE COUNTY

I, **Brendan Sullivan**, after first being duly cautioned and sworn, state and affirm that the facts contained in the foregoing document are true and accurate to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NAUGHT.

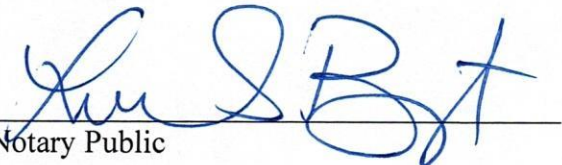


Brendan Sullivan

30th Sworn to before me and subscribed in my presence by Brendan Sullivan this
day of August, 2024.



LAURA S. PEZZOT
Notary Public
In and for the State of Ohio
My Comm. Expires Jan. 30, 2025



Notary Public

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing was electronically filed with the Montgomery County Clerk of Courts by using the ECF system which will send notice of electronic filing to the registered users, and it is hereby certified that the undersigned has sent a copy of the foregoing to all non-Electronic Filing participants via regular U.S. Mail, postage pre-paid, on this 4th day of September 2024.

/s/ Matthew J. Barbato

Matthew J. Barbato (0076058)