Electronically Filed - ST LOUIS COUNTY - November 15, 2023 - 03:28 PM

IN THE FAMILY COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

In Re the Marriage of:	)	
	)	
SHAYNA HOLMES,	)	
	)	
Petitioner,	)	Cause No: 15SL-DR02693
	)	
v.	)	Division: 32
	)	
LONNIE HOLMES,	)	
	)	
Respondent.	)	

MOTION FOR PRELIMINARY INJUNCTION

COMES NOW, Petitioner, SHAYNA HOLMES, by and through her undersigned counsel, and states to the Court as follows:

1. On or about _____, this Court entered a Temporary Restraining Order prohibiting Respondent from exercising his custodial periods with Addyson Holmes until further order.

2. Immediate and irreparable harm, danger and injury will result to the minor child by reason of Respondent's actions, as more particularly appears in Petitioner's Petition for Temporary Restraining Order incorporated herein as if more fully set forth herein.

3. That Petitioner has no adequate remedy at law.

4. If this Preliminary Injunction is granted, the injury, if any, to Respondent if final judgment be in Respondent's favor, will be inconsiderable and will be adequately indemnified by bond.

WHEREFORE, Petitioner prays as follows:

1. For a Preliminary Injunction restraining Respondent from exercising his custodial

periods by preliminary injunction;

2. For a Permanent Injunction restraining Respondent from exercising his custodial periods by permanent injunction;

3. For such other further relief as in equity may be just.

Respectfully Submitted,

FAMILY LAW PARTNERS

/s/ Jamie Emahiser

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Attorneys for Petitioner

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STATE OF MISSOURI)
) ss:
COUNTY OF ST. LOUIS)

COMES NOW, SHAYNA HOLMES, being of lawful age and after being duly sworn, states that she has read the foregoing Motion for Preliminary Injunction and that the facts therein are true and correct according to the best of her knowledge, information and belief.

Shayna Holmes

SHAYNA HOLMES

Subscribed and sworn to before me, a Notary Public, this 15 day of November 2023.

Megan Price

Notary Public

My Commission Expires
5-13-25

MEGAN R. PRICE
Notary Public, Notary Seal
State of Missouri
Franklin County
Commission # 21996548
My Commission Expires 05-13-2025

Not an Official Court Document

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