CITATION BY POSTING
THE STATE OF TEXAS)
COUNTY OF HUNT)
TO: CHANDRA J. TRAYLOR

"You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you."

The petition of ROBERT WAYNE TRAYLOR, Petitioner, was filed in the 354th District Court of Hunt County, Texas, on this the 13th day of February, 2020 against CHANDRA J. TRAYLOR respondent(s), and entitled

IN THE MATTER OF THE MARRIAGE OF:

ROBERT WAYNE TRAYLOR AND CHANDRA J. TRAYLOR

This suit Requests: DIVORCE

The Court has authority in this suit to enter any judgment or decree dissolving the marriage and providing for the division of property which will be binding on you.

The Court has authority in this suit to enter any judgment or decree in the child (ren)'s interest which will be binding upon you, including the termination of the parent-child relationship, the determination of Paternity and the appointment of a conservator with authority to consent to the child (ren)'s adoption."

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF SAID COURT at Greenville, Hunt County, Texas, on this the 17th day of April, 2020.

SUSAN SPRADLING, DISTRICT CLERK HUNT COUNTY, TEXAS

Address:

Hunt County Courthouse

2500 Lee Street

Greenville, Texas 75401

Issued at the request of:
ROBERT WAYNE TRAYLOR
8823 CR 3602
QUINLAN, TX. 75474

SHERIFF'S RETURN

Came to hand on the day of, 20 <u>at, 20 at</u>
FEES: Serving Citation\$ 75.00

CONSTABLE Hunt County, Texas OR RANDY MEEKS, SHERIFF

Hunt County, Texas

Deputy

FEB 13 2020 NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA. Cause Number: (The Clerk's office will fill in the Cause Number and Court Number when you file this form.) IN THE MATTER OF THE MARRIAGE OF Petitioner: District Court County Court at Law County, Texas **Original Petition for Divorce** My name is: I am the Petitioner, the person asking for a divorce. The last three numbers of my driver's license number are: My driver's license was issued in (State) or I do not have a driver's license number. The last three numbers of my social security number are: or do not have a social security number. My spouse is the Respondent. 1. Discovery Level The discovery level in this case, if needed, is: (Check one box.) Level 1. (Check here if you and your spouse have less than \$50,000 in property.) Level 2. (All other couples check here.) 2. Legal Notice (Check one box.) I think my spouse will sign a Waiver of Service (or Answer). Do not send a sheriff, constable, or process server to serve my spouse with a copy of this Petition for Divorce at this time. will have a sheriff, constable, process server or clerk serve my spouse with this Petition for Divorce If this is a work address, name of business: I ask the clerk to issue a Citation of Service (the form necessary to provide legal notice to my spouse by "Official Service of Process"). I understand that I will need to pay the fee (or file an Affidavit of Indigency form to show the Court that I am unable to pay the fee) and arrange for service. I cannot find my spouse. I ask that my spouse be served by posting or publication. I understand I must file an Affidavit for Citation by Posting or Affidavit for Citation by Publication depending on my case. If my spouse and I have property, I understand I must also hire a lawyer to serve as attorney ad litem for my spouse.

FILED

3. Jurisdiction

3A. County Residence Requirement	divorce in Texas until you or			
(Check all boxes that apply.)	your spouse has lived in the county where you are			
I have lived in this county for the last 90 days.	asking for a divorce for at			
My spouse has lived in this county for the last 90 days.	least the last 90 days and in Texas for at least the last six			
I am serving in the armed forces or other government service outside of Texas, but this county has been the home county of either my spouse or me for at least 90 days.	months. There are <u>special rules for</u> military families and others			
I have accompanied my spouse who is serving in the armed forces or other government service outside of Texas, but this county has been the home county of either my spouse or me for at least 90 days.	who are absent from the state due to government service. Read "How to File an Uncontested Divorce" at www.TexasLawHelp.org for more information.			
3B.Texas Residence Requirement				
(Check all boxes that apply.)				
I have lived in Texas for the last six months.				
My spouse has lived in Texas for the last six months.				
I am serving in the armed forces or other government service outside of Texas, but Texas is the home state of either my spouse or me and has been for at least 6 months.				
l have accompanied my spouse who is serving in the armed forces or of of Texas, but Texas is the home state of either my spouse or me and have				
3C.Personal Jurisdiction over Spouse				
(Check one box.)				
My spouse lives in Texas.				
☐ My spouse does not live in Texas.				
(If your spouse does not live in Texas, check any boxes that apply below.)				
 My spouse agrees that a Texas court can make orders in this divorce property and debts. My spouse will file a Waiver of Service (or Answer Texas is the last state where we lived together as a married couple. less than two years after we separated. 	ver).			
4. Dates of Marriage and Separation				
` .	2001			
My spouse and I got married on or about: Day Day	Year .			
We stopped living together as spouses on or about:	Day Year			

5. Grounds for Divorce

I ask the Court to grant me a divorce. The marriage has become insupportable due to discord or conflict of personalities that destroys the legitimate ends of the marital relationship and prevents any reasonable expectation of reconciliation.

Note: You cannot file for

6. No Children Together

My spouse and I do not have any biological or adopted children together who are under 18 years old or still in high school.

	s the Wife Pregnant? k one box.)	Note: Talk to a lawyer if you have an adult disabled child who is not capable of supporting him or herself because of the disability. You or your spouse could be entitled to receive child support.
UT	he wife in this marriage is not pregnant.	
	he wife in this marriage is pregnant. I understand that I annot finish the divorce until after the child is born.	
(1	f the wife is pregnant, also check one box below.)	
	The husband is the father of this child. I ask the court to support and medical support for the child in the Final Dec	
	The husband is not the father of this child. I understand established before I can finish the divorce. (Read "Texas I www.TexasLawHelp.org for information about establishing pate	Paternity Law: Frequently Asked Questions" at
8. [old the Wife have a Child with Another Man whi	le Married to the Husband?
(Chec	k one box. Fill in the requested information, if applicable.)	
	he wife did not have a child with another man while married	I to the husband.
	he wife did have a child with another man while married to buring the marriage that are not the Husband's adopted or bi	
	Child's name Age	Date of Birth Sex
	1	
	2	
	3	
,	4	
	5	
	6	
(1	f the wife had a child or children with another man during the marri	age, check one box below,)
	Paternity of the child/ren named above has not been est child/ren <u>must</u> be established before I can finish my divor Asked Questions" at <u>www.TexasLawHelp.org</u> for information ab	ce. (Read "Texas Paternity Law: Frequently
	Paternity of the child/ren named above has been established	hed: (Check one box.)
	A court order has established that another man is the not the biological father of the child/ren listed above. copy of the court order to my Final Decree of Divorce	I understand I must attach a file-stamped
	An Acknowledgement of Paternity was signed by the was signed by the Husband for the child/ren listed at these documents to my Final Decree of Divorce.	biological father <u>and</u> a <i>Denial of Paternity</i> cove. I understand I must attach a copy of

9. Protective Order Statement (Check the appropriate boxes. Fill in the requested information, if applicable.) 9A. No Protective Order I do not have a Protective Order against my spouse and I have not asked for one. My spouse does not have a Protective Order against me and has not asked for one. 9B. Pending Protective Order I have filed paperwork at the courthouse asking for a Protective Order against my spouse, but a judge has not decided if I should get it. I asked for a Protective Order on _ County, _____. The cause number is _ County Cause Number If I get a Protective Order, I will file a copy of it before any hearings in this divorce. My spouse has filed paperwork asking for a Protective Order against me, but a judge has not decided if my spouse will get it. My spouse asked for a Protective Order on ____ County, ____. The cause number is ___ Cause Number If my spouse gets a Protective Order, I will file a copy of it before any hearings in this divorce. 9C. Protective Order in Place I got the Protective Order against my spouse. I got the Protective Order in County, ____ County The cause number for the Protective Order is _ Cause Number Either I have attached a copy of the Protective Order to this Petition or I will file a copy of it with the court before any hearings in this divorce. My spouse does have a Protective Order against me. The Protective Order was made in County, County Date Ordered The cause number for the Protective Order is Cause Number Either I have attached a copy of the Protective Order to this Petition or I will file a copy of it with the court before any hearings in this divorce. 10. Waiver of Waiting Period Based on Family Violence (Check only if applicable.) ☐ I ask the Court to waive the 60-day waiting period for divorce because: (Check one box.) Mv spouse has been convicted of or received deferred adjudication for a crime involving family violence against me or a member of my household. I have an active protective order or an active magistrate's order for emergency protection against

my spouse because of family violence during our marriage. The order includes a finding that my

spouse committed family violence.

11. Property and Debt

Note: It is very important to talk with lawyer if you or your spouse has a house, land, business, retirement funds, other valuable property or debt. Getting advice from a lawyer now can save you time and money in the long run.

About community property: Texas is a community property state. This means that any new property that either spouse gets from the minute they are married until the minute the judge grants the divorce is probably community property, even if the property is only in one spouse's name. About separate property: Property owned by a spouse before the marriage is that spouse's separate property. In addition, if either spouse receives a gift, an inheritance, or a recovery for personal injuries that occurred during the marriage (not including a recovery for lost wages or medical expenses); it is that spouse's separate property. There are exceptions to these general rules. If you have questions talk to a lawyer.

About retirement: Retirement funds (such as 401k, pension, profit sharing, stock option plans and IRAs) earned by either spouse during the marriage are usually considered to be community properly that can be divided by the court. This is true even if you or your spouse has not yet retired. If you want the Court to divide retirement funds (other than an IRA), you will need to have the Court sign an additional form, usually called a "Qualified Domestic Relations Order" (QDRO), to make the division effective. You should have the QDRO prepared before you go to court, so the judge can sign it when you finish your divorce. A QDRO form is not included with this divorce set. You may be able to get a sample QDRO form from the employer or retirement fund administrator. If not, you should hire a lawyer to draft the QDRO form. If you use the employer or retirement fund administrator's QDRO form, you should still have a lawyer review it to make sure you are not giving up important benefits. Note: If you and your spouse plan to keep your own retirement funds or do not have retirement funds, you do not need a QDRO.

About debt: A creditor's right to collect a debt is not affected by a divorce decree. So, if the Court orders your spouse to pay a debt (such as a mortgage) that is in both of your names but your spouse doesn't pay it, the creditor can still seek payment from you. Ask a lawyer how to protect yourself in this situation.

11A. Community Property and Debt

If my spouse and I can agree about how to divide the property and debts we got during our marriage, I ask the Court to approve our agreement. If we cannot agree, I ask the Court to divide our community property and debts according to Texas law.

11B. Separate Property

I own the following separate property. I owned this property before I was married or I received this property as a gift or inheritance during my marriage or I received this property as recovery for personal injuries that occurred during the marriage (not including any recovery for lost wages or medical expenses). I ask the Court to confirm this property as my separate property.

(Fill in all lines. If you have no property to list in a particular category, write "none.")

House or land I	ocated NA Street Addres	ŝs	City	State Zip
Cars, trucks, m	otorcycles or other v	rehicles		
Year	Make	Model	Vehicle Identific	ation No. [VIN]-
			narried, received as a n separate property fu	gift or inheritance during my
		ersonal injuries that or		

12. Name Change (Check one box.)	Note: You cannot use this form to change your name to anything other than a name you used before you got married. to change my name.		
I am NOT asking the Cour			
		used before my marriage. I am not asking the nor creditors. I ask that my name be changed	
First	Middle	Last	
13. Request for Judgn	nent		
I ask the Court to grant my div Petition and any other orders		make the other orders I have asked for in this	
Robert W. Tr	raylor	2-13-20	
Petitioner's Name > Pobont W.	Traylor	903-340-0402	
Petitioner's Signature	202	Phone Punlan Te 25474	
Mailing Address Emall Address:		City State Zip Fax # (if any)	
-)			
Warning: Your spouse will get a the Hope Line at 1-800-374-4673		oncerned about your spouse learning your address filing this form with the court.	
does not have an attorney) i	in writing if my mailing add on't, any notices about this	se's attorney (or my spouse if my spouse dress or email address changes during the case including the dates and times of email address above.	
		w to file an answer, go to <u>www.TexasLawHelp.o</u>	
Fore	referred to a leverer pall very le	local low or mercal consise	

For a referral to a lawyer call your local lawyer referral service or the State Bar of Texas Lawyer Referral Information Service at 1-800-252-9690.

For information about free and low-cost legal help in your county go to www.TexasLawHelp.org
or call the Legal Aid office serving your area:

Legal Aid of Northwest Texas 1-888-529-5277 (serves Dallas / Ft. Worth area & Northwest Texas)

Lone Star Legal Aid 1-800-733-8394 (serves Houston area & East Texas)

Texas Rio Grande Legal Aid 1-888-988-9996 (serves Austin / San Antonio area, El Paso area & South Texas)

If you have been the victim of family violence, or if at any time you feel unsafe, get help by calling the:

National Domestic Violence Hotline at 1-800-799-SAFE (7233) or Texas Family Violence Hope Line at 1-800-374-HOPE (4673) or Advocates for Victims of Crime (AVOICE): at 1-888-343-4414.

OCT 1 9 2017 SAS

HUNT COUNTY STANDING ORDER REGARDING CHILDREN, PROMAND CONDUCT OF THE PARTIES

No party to this lawsuit has requested this order. Rather, this order is a standing order of the Hunt County District Courts that applies in every divorce suit and every suit affecting the parent-child relationship filed in Hunt County, except cases initiated by the Attorney General of Texas or the Department of Family Protective and Regulatory Services. The District Courts of Hunt County have adopted this order because the parties and their children should be protected and their property preserved while the lawsuit is pending before the court. Therefore it is ORDERED:

- 1. <u>NO DISRUPTION OF CHILDREN</u>. Both parties are ORDERED to refrain from doing the following acts concerning any children who are subjects of this case:
 - 1.1 Removing the children from the State of Texas, acting directly or in concert with others, without the written agreement of both parties or an order of this Court.
 - 1.2 Disrupting or withdrawing the children from the school or day-care facility where the children are presently enrolled, without the written agreement of both parties signed and filed with this Court, or an order of this Court.
 - 1.3 Hiding or secreting the children from the other parent or changing the children's current place of abode, without the written agreement of both parents signed and filed with this Court, or an order of this Court. If an order is in place "current place of abode" means the primary residence of the child as reflected in the order. Further, this standing order does not affect access and possession unless extraordinary relief is requested.
 - 1.4 Disturbing the peace of the children.
 - 1.5 Making disparaging remarks about the other parent or the other parent's family members, to include but not be limited to the child's grandparents, aunts, uncles, or stepparents.
 - 1.6 Discussing with the children, or with any other person in the presence of the children, any litigation related to the children or the other party.
 - 1.7 If this is an original divorce action, allowing anyone with whom the party is romantically involved, to remain overnight in the home while in possession of the child. Overnight is defined from 10:00 p.m. until 7:00 a.m.
 - 1.8 Using or possessing any dangerous drug or controlled substance not prescribed by a physician during any period of possession of a child, or within the 12 hours preceding any period of possession.

- 2. <u>CONDUCT OF THE PARTIES DURING THE CASE</u>. Both parties are ORDERED to refrain from doing the following acts:
 - 2.1 Using vulgar, profane, obscene, or indecent language, or a course or offensive manner to communicate with the other party, whether in person, by telephone, or in writing.
 - 2.2 Threatening the other party in person, by telephone, or in writing to take unlawful action against any person.
 - 2.3 Placing one or more telephone calls, at any unreasonable hour, in an offensive or repetitious manner without a legitimate purpose of communication, or anonymously.
 - 2.4 Intentionally, knowingly or recklessly causing bodily injury to the other party or the child of either party.
 - 2.5 Opening or diverting mail addressed to the other party.
- 3. PRESERVATION OF PROPERTY AND USE OF FUNDS DURING DIVORCE CASE. If this is a divorce case, both parties to the marriage are ORDERED to refrain from doing the following acts:
 - 3.1 Destroying, removing, concealing, encumbering, transferring, or otherwise harming or reducing the value of the property of one or both parties.
 - 3.2 Misrepresenting or refusing to disclose to the other party or to the Court, proper request, the existence, amount, or location of any tangible or intellectual property of the parties or either party, including electronically stored or recorded information.
 - 3.3 Damaging or destroying the tangible property of one or both of the parties, including any document that represents or embodies anything of value.
 - 3.4 Tampering with the tangible property of one or both of the parties, including any documents that represents or embodies anything of value, and causing pecuniary loss to the other party.
 - 3.5 Selling, transferring, assigning, mortgaging, encumbering, or in any other manner alienating any of the property of either party, whether personal property or real estate property, and whether separate or community, except as specifically authorized by this order.
 - 3.6 Incurring any indebtedness, other than legal expense in connection with this suit, except as specifically authorized by this order.

- 3.7 Making withdrawals from any checking or savings account in any financial institution for any purpose, except as specifically authorized by this order.
- 3.8 Spending any sum of cash in either party's possession or subject to either party's control for any purpose, except as specifically authorized by this order.
- 3.9 Withdrawing or borrowing in any manner for any purpose from any retirement, profit-sharing, pension, death, or other employee benefit plan or employee savings plan or from any individual retirement account or Keogh account, except as specifically authorized by this order.
- 3.10 Signing or endorsing the other party's name or any negotiable instrument, check, or draft, such as tax refunds, insurance payments, and dividends, or attempting to negotiate any negotiable instrument payable to the other party without the personal signature of the other party.
- 3.11 Taking any action to terminate or limit credit or charge cards in the name of the other party.
- 3.12 Entering, operating, or exercising control over the motor vehicle in the possession of the other party.
- 3.13 Discontinuing or altering the withholding for federal income taxes on wages or salary while this suit is pending.
- 3.14 Terminating or in any manner affecting the service of water, electricity, gas, telephone, cable television, or other contractual services such as security, pest control, landscaping, or yard maintenance at the other party's residence or in any manner attempting to withdraw any deposits for service in connection with such services.
- 3.15 Intercepting or recording the other party's electronic communications.
- 3.16 Entering any safe deposit box in the name of or subject to the control of the parties or either party, whether individually or jointly with others
- 3.17 For the purposes of this Order, "personal property" and "tangible property" includes, but is not limited to, the following:
 - a. cash, checks, traveler's checks, and money orders;
 - b. funds on deposit in financial accounts with commercial banks, savings banks, and credit unions;
 - c. funds and assets held in brokerage, mutual fund, and other investment accounts;

- d. publicly traded stocks, bonds and other securities;
- e. stock options and restricted stock units;
- f. bonuses:
- g. closely held business interests;
- h. retirement benefits and accounts;
- i. deferred compensation benefits;
- j. insurance policies, annuities, and health savings accounts;
- k. motor vehicles, boats, airplanes, cycles, mobile homes, trailers, and recreational vehicles;
- 1. money owed to one or both parties, including notes and expected income tax refunds;
- m. household furniture, furnishings and fixtures;
- n. electronics and computers;
- o. antiques, artworks, and collections;
- p. sporting goods and firearms;
- q. jewelry and other personal items;
- r. pets and livestock;
- s. club memberships;
- t. travel award benefits and other award accounts;
- u. crops, farm equipment, construction equipment, tools, leases, cemetery lots, gold or silver coins not part of a collection, tax overpayments, loss carry-forward deductions, lottery tickets/winnings, stadium bonds, stadium seat licenses, seat options, season tickets, ranch brands, and business names;

- v. digital assets such as e-mail addresses, social networking accounts, web sites, domain names, digital media such as pictures, music, e-books, movies and videos, blogs, reward points, digital storefronts, artwork, and data storage accounts;
- w. safe deposit boxes and their contents;
- x. storage facilities and their contents; and
- y. contingent assets.
- 4. <u>PERSONAL AND BUSINESS RECORDS IN DIVORCE CASE</u>. If this is a divorce case, both parties to the marriage are ORDERED to refrain from doing the following acts:
 - 4.1 Concealing or destroying any family records, property records financial records business records or any records of income, debt or other obligations.
 - 4.2 Falsifying any writing or record relating to the property of either party.
 - 4.3 Destroying, disposing of, or altering any e-mail, text message, video message, or chat message or other electronic data or electronically stored information relevant to the subject matter of the suit for dissolution of marriage, regardless of whether the information is stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium.
 - 4.4 Modifying, changing, or alternating the native format or metadata of any electronic data or electronically stored information relevant to the subject matter of the suit for dissolution of marriage, regardless of whether the information is stored on a hard drive, in a removable storage device, in cloud storage, or in another electronic storage medium.
 - 4.5 Deleting any data or content from any social network profile used or created by either party or a child of the parties.
 - 4.6 Using any password or personal identification number to gain access to the other party's e-mail account, bank account, social media account, or any other electronic account.
 - 4.7 Excluding the other party from the use and enjoyment of a specifically identified residence of the other party.
 - 4.8 "Records" include e-mail or other digital or electronic data, whether stored on a computer hard drive, diskette or other electronic storage device.

- 5. <u>INSURANCE IN DIVORCE CASE</u>. If this is a divorce case, both parties to the marriage are ORDERED to refrain from doing the following acts:
 - 5.1 Withdrawing or borrowing in any manner all or any part of the cash surrender value of life insurance policies on the life of either party, except as specifically authorized by this order.
 - 5.2 Changing or in any manner altering the beneficiary designation on any life insurance on the life of either party or the parties' children.
 - 5.3 Canceling, altering, or in any manner affecting any casualty, automobile, or health insurance policies insuring the parties' property of persons including the parties' minor children.
- 6. <u>SPECIFIC AUTHORIZATIONS IN DIVORCE CASE</u>. If this is a divorce case, both parties to the marriage are specifically authorized to do the following:
 - 6.1 To engage in acts reasonable and necessary to the conduct of that party's usual business and occupation.
 - 6.2 To make expenditures and incur indebtedness for reasonable attorney's fees and expenses in connection with this suit.
 - 6.3 To make expenditures and incur indebtedness for reasonable and necessary living expenses for food, clothing, shelter, transportation and medical care.
 - 6.4 To make withdrawals from accounts in financial institutions only for the purposes authorized by this order.
 - 6.5 Nothing in this order:
 - (a) Excludes a spouse from occupancy of the residence where that spouse is living except as provided in a protective order made in accordance with Title 4;
 - (b) Prohibits a party from spending funds for reasonable and necessary living expenses; or
 - (c) Prohibits a party from engaging in acts reasonable and necessary to conduct that party's usual business and occupation.

7. SERVICE AND APPLICATION OF THIS ORDER.

7.1 The Petitioner shall attach a copy of this order to the original petition and to each copy of the petition. At the time the petition is filed, if the Petitioner has failed to attach a copy of this order to the petition and any copy of the petition, the Clerk shall ensure that a copy of this order is attached to the petition and every copy of the petition presented.

- 7.2 This order is effective upon the filing of the original petition and shall remain in full force and effect as a temporary restraining order for fourteen days after the date of the filing of the original petition. If no party contests this order by presenting evidence at a hearing on or before fourteen days after the date of the filing of the original petition, this order shall continue in full force and effect as a temporary injunction until further order of this court. This entire order will terminate and will no longer be effective when the court signs a final order or the case is dismissed.
- 8. <u>EFFECT OF OTHER COURT ORDERS</u>. If any part of this order is different from any part of a protective order that has already been entered or is later entered, the protective order provisions prevail. Any part of this order not changed by some later order remains in full force and effect until the court signs a final decree.
- 9. PARTIES ENCOURAGED TO MEDIATE. The parties are encouraged to settle their disputes amicably without court intervention. The parties are encouraged to use alternative dispute resolution methods, such as mediation, to resolve the conflicts that may arise in this lawsuit.
- 10. <u>BOND WAIVED</u>. IT IS ORDERED that the requirement of a bond is waived.

THIS HUNT COUNTY STANDING ORDER REGARDING CHILDREN, PROPERTY AND CONDUCT OF THE PARTIES SHALL BECOME EFFECTIVE ON NOVEMBER 1, 2017.

Keli Aiken, District Judge 354th Judicial District Court

JJT Judicial District Court

J. Andrew Bench, District Judge 196th Judicial District Court