

CAUSE NO. _____

IN THE MATTER OF
THE MARRIAGE OF

AND

AND IN THE INTEREST OF

MINOR CHILD(REN)

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IN THE DISTRICT COURT OF

FORT BEND COUNTY, TEXAS

387TH JUDICIAL DISTRICT

AGREED TEMPORARY MUTUAL INJUNCTIONS

THE PARTIES TO THE ABOVE PENDING LAWSUIT ARE ORDERED TO COMPLY WITH THE FOLLOWING ORDERS OF THE COURT WHILE THE LAWSUIT IS PENDING. THE TEMPORARY INJUNCTION APPLIES TO THE PETITIONER AND RESPONDENT AND IS EFFECTIVE IMMEDIATELY.

1. **NO DISRUPTION OF A CHILD WHO IS THE SUBJECT OF THIS CASE:** All parties are ORDERED to refrain from doing the following acts concerning any child who is the subject of a case without a written agreement of all parties or an order of the Court:
 - a. Removing a child from the State of Texas for the purpose of changing the residence of the child or evading the jurisdiction of the Court, acting directly or in concert with others.
 - b. Disrupting or withdrawing a child from the school or day-care facility where a child is presently enrolled.
 - c. Hiding or secreting a child from the other parent or changing the child's current place of abode.
 - d. Disturbing the peace of the child or the other party.
 - e. Making disparaging remarks regarding the other party or the other party's family in the presence or within the hearing of a child.
 - f. Consuming alcohol within the 12 hours before or during any period of possession or access to the child.
 - g. Consuming illegal drugs at any time or using prescription drugs other than as prescribed by a treating physician.

- h. To refrain from permitting an individual with whom either party has an intimate or dating relationship to remain in the presence of the child between the hours of 10:00 p.m. and 8:00 a.m.

2. **CONDUCT OF THE PARTIES DURING THE CASE.** All parties are ORDERED to refrain from doing the following acts:

- a. Communicating in person or in any other manner, including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging with another party by use of vulgar, profane, obscene or indecent language or in a coarse or offensive manner, to communicate with another party or a child, whether in person, by telephone, electronically or in writing.
- b. Threatening another party in person or in any other manner including by telephone or another electronic voice transmission, video chat, in writing, or electronic messaging, to take unlawful action against any person.
- c. Placing one or more telephone calls, at an unreasonable hour, in an offensive or repetitious manner, without a legitimate purpose of communication, or placing such calls anonymously to another party.
- d. Causing bodily injury to the other party or to a child of either party.
- e. Threatening the other party or a child with imminent bodily injury.
- f. Opening or diverting mail or e-mail or any other electronic communication addressed to the other party.
- g. Using any password or personal identification number to gain access to another party's e-mail account, bank account, social media account, or any other electronic account.

3. **PRESERVATION OF PROPERTY AND USE OF FUNDS DURING DIVORCE CASE.** All parties to the marriage are ORDERED to refrain from doing the following acts:

- a. Destroying, removing, concealing, encumbering, transferring or otherwise harming or reducing the value of the property of one or both of the parties.
- b. Misrepresenting or refusing to disclose, on proper request, or to the Court, the existence, amount or location of any tangible or intellectual property of any party, including electronically stored or recorded information.
- c. Tampering with, damaging or destroying the tangible or intellectual property of one or both of the parties, including electronically stored or recorded information or any document that represents or embodies anything of value.
- d. Selling, transferring, assigning, mortgaging, encumbering, or in any other manner alienating any of the property of either party, whether personal

property, real property, or intellectual property and whether separate or community, except as specifically authorized by this order.

- e. Incurring any indebtedness, other than legal expenses in connection with this suit, except as specifically authorized by this order.
- f. Making withdrawals from any checking or savings account in any financial institution for any purpose, except as specifically authorized by this order.
- g. 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.
- h. Withdrawing or borrowing money in any manner 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. .
- i. Entering any safe-deposit box in the name of or subject to the control of either party, whether individually or jointly with others, except as specifically authorized by this order.
- j. Signing or endorsing the other party's name on 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.
- k. Taking any action to terminate or limit credit or debit cards in the name of the other party.
- l. Entering, operating or exercising control over the motor vehicle in the possession of the other party.
- m. Discontinuing or reducing the withholding for federal income taxes on wages or salary of a party.
- n. 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.
- o. Excluding the other party from the use and enjoyment of the other party's current residence.

4. **PERSONAL AND BUSINESS RECORDS IN DIVORCE CASE.** "Records" means any tangible document or recording and includes e-mail or other digital or electronic data, whether stored on a computer hard drive, diskette or other electronic storage device. All parties are ORDERED to refrain from doing the following acts:

- a. Concealing, destroying, disposing or altering any family records, property records, financial records, business records or any records of income, debts or other obligations.
 - b. Falsifying any writing or record, including an electronic record, relating to the property or debt of another party.
 - c. 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.
 - d. Modifying, changing, or altering the native format of metadata or 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.
 - e. Deleting any data or content from any social network profile used or created by either party or a child of the parties.
5. **INSURANCE IN DIVORCE CASE.** All parties to the marriage are ORDERED to refrain from doing the following acts:
- a. 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, or a child of the parties, except as specifically authorized by this order.
 - b. Changing or in any manner altering the beneficiary designation on any life insurance on the life of either party or the parties' child.
 - c. Canceling, altering, failing to renew or pay premiums on, or in any manner affecting any casualty, automobile or health insurance policy, Medicaid or CHIPS benefits insuring the parties' property or persons, including the parties' children.
6. **SPECIFIC AUTHORIZATIONS IN DIVORCE CASE.** All parties to the marriage are specifically authorized to do the following:
- a. To engage in acts reasonable and necessary to conduct each party's usual business and occupation.
 - b. To make expenditures and incur indebtedness for reasonable and necessary attorney's fees and expenses in connection with this suit.
 - c. To make expenditures and incur indebtedness for reasonable and necessary living expenses including food, clothing, shelter, transportation and medical care.

- d. To make withdrawals from accounts in financial institutions for the purposes authorized by a Court Order.

Petitioner

Respondent

Attorney for Petitioner

Attorney for Respondent

SIGNED this _____ day of _____, 20____.

Janet M. Heppard
Presiding Judge

Richard T. Bell
Associate Judge