

IN THE CIRCUIT COURT FOR PINELLAS COUNTY, FLORIDA
CIRCUIT CIVIL NO. 07-013355-FD-014

IN RE: THE MARRIAGE OF

LINDA MARIE BOLLEA,

Petitioner/Wife,

and

TERRY GENE BOLLEA,

Respondent/Husband. /

KEN BURKE
CLERK OF CIRCUIT COURT



2008 FEB 22 PM 1:59

FILED
CML COURT REG DEPT

**NOTICE OF FILING WIFE'S MOTION FOR TEMPORARY
INJUNCTION PROHIBITING HUSBAND FROM INVOLVING
MINOR CHILD IN DISSOLUTION PROCEEDINGS**

Petitioner/Wife, LINDA MARIE BOLLEA, through her undersigned counsel, gives notice that the Wife has filed her Motion for Temporary Injunction Prohibiting Husband from Involving Minor Child in Dissolution Proceedings on February 22, 2008.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via fax and U.S. Mail to **Ann Loughridge Kerr, Esq.**, 425 South Garden Avenue, Clearwater, Florida 33756 this 22 day of February, 2008.



O. Stephen Thacker, Esq.
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Tel: 727-446-0525
SPN 00000143; Florida Bar No. 202908

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY FLORIDA
FAMILY LAW DIVISION

IN RE: THE MARRIAGE OF:
LINDA MARIE BOLLEA,

Case No. 07-DR-013355-FD-14

Petitioner,
and

TERRY GENE BOLLEA,

Respondent.



**WIFE'S MOTION FOR TEMPORARY INJUNCTION PROHIBITING HUSBAND
FROM INVOLVING MINOR CHILD IN DISSOLUTION PROCEEDINGS**

The Petitioner/Wife LINDA MARIE BOLLEA hereby files her Motion for Temporary Injunction Prohibiting Husband From Involving Minor Child in Dissolution Proceedings, and in support thereof would show:

1. The parties were married to each other on December 18, 1983 in Los Angeles, California.
2. An action for dissolution of marriage between the parties is currently pending before this court.
3. There have been two (2) children born of this marriage who are: Nicholas Allen Bollea, a son born July 27, 1990, who is seventeen (17) years of age, and Brooke Ellen Bollea, a daughter born May 4, 1988, who is an adult. No other children have been adopted and none are anticipated of this marriage.
4. Since late 2007, the parties have lived separately with the Wife being the primary residential parent of the minor child, Nicholas Allen Bollea.
5. During the pendency of this case, the Husband has utilized the minor child

as a means of delivering messages to the Wife concerning issues relevant to the dissolution proceedings. When the Wife does not answer the telephone calls of the Husband, the Husband has instructed the minor child to telephone the Wife for the purpose of getting her to answer the telephone so that minor child can then give his telephone back to the Husband. The Husband has also provided information to the minor child concerning the divorce proceedings with instructions not to tell the Wife, which has resulted in minor child becoming withdrawn and conflicted while in the presence of the Wife.

6. The Husband has also utilized the minor child as a tool to encourage the Wife to act in a manner consistent with the Husband's wishes in the divorce proceedings.

7. The Wife has previously taken the position that she is not interested in selling the jointly-titled marital home at this time. In conversations between the Husband and minor child, the Husband has engaged in long conversations on why it is so important that the Wife sell the marital home. The Husband has also told the minor child that the sale of the marital home will ensure the best result with regard to the minor child's pending criminal case, as well as the Husband's anticipated personal injury lawsuit.

8. Such actions on the part of the Husband can and will result in disparagement to the minor child if the Wife does not acquiesce to the Husband's wishes as conveyed through the minor child. There is no adequate remedy at law.

9. It is in the best interest of the minor child that the Husband be enjoined from communicating with the minor child about any matters pertinent or relevant to the parties' pending divorce proceedings.

10. The Wife has retained the undersigned counsel to represent her in this cause and has agreed to pay him reasonable attorney's fees, suit money and costs.

WHEREFORE, the Wife LINDA MARIE BOLLEA prays that his Honorable Court issue its Order as follows:

A. Enjoin the Husband from (i) discussing, mentioning, or conveying to the minor child any communication concerning the dissolution of marriage action between the parties; (ii) expressing his thoughts or feelings to the minor child with regard to any action or inaction on the part of the Wife; (iii) questioning the minor child about the actions or whereabouts of the Wife; (iv) utilizing the minor child as a messenger between the parties or as a means of encouraging the Wife to act or not act in a many manner whatsoever; (v) disparaging the Wife in any manner whatsoever in the presence of the minor child, until further Order of this Court.

B. Award the Wife reasonable attorney fees, suit money and costs associated with this action.

C. Grant such other relief as this Court deems just and proper.

CERTIFICATE OF SERVICE

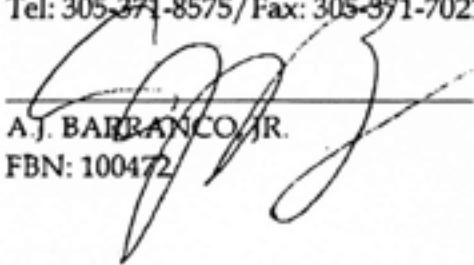
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by facsimile and U.S. Mail to: Ann Loughridge Kerr, Esq., 425 South Garden Avenue, Clearwater, Florida 33756 this 2nd day of February, 2008.

Counsel for Petitioner/Wife

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A.J. BARRANCO, JR.
FBN: 100472

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