

STATE OF WISCONSIN

CIRCUIT COURT  
FAMILY COURT BRANCH

MONROE COUNTY

In re the marriage of:

JENNIFER HOWE SAULS MCKINNEY,

Petitioner,

and

ISRAEL RYAN MCKINNEY,

Respondent.

**AFFIDAVIT FOR  
TEMPORARY ORDER**

Case No. 11-FA-12 FA 108

STATE OF WISCONSIN    )  
                                  ) ss.  
LA CROSSE COUNTY     )

Jennifer Howe Sauls McKinney swears as follows:

1. I am the petitioner in this action for legal separation and reside  
                                  in Wisconsin, 54656.
2. My spouse and I were married on October 16, 2003, at La Crosse, Wisconsin, and ever since  
have been husband and wife.
3. My spouse and I have the following minor children, now in my control, namely: K  
McKinney, born December 16, 2004 (age 7); C McKinney, born August 1, 2006 (age  
5); M McKinney, born October 19, 2007 (age 4); S McKinney, born October 29,  
2008 (age 3); and L McKinney, born August 2, 2010 (age 1).
4. My spouse and I have not agreed on an economic arrangement during the pendency of this  
action, and there is a need for such orders as requested in this affidavit.

**FILED**

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- 5. I fear my legal rights and the rights of our minor children to support will be jeopardized unless the respondent is restrained from encumbering, disposing of, or removing any of the marital property or other than marital property from this state during the pendency of this action.
- 6. In order to preserve the estate and all of my spouse's and my property pending the trial of this action and to protect the legal rights of our children, there is a need for such orders as requested.

Therefore, I request that a hearing be held and a temporary order be entered, pursuant to the provisions of Wis. Stat. § 767.225, as follows:

- A. Granting sole legal custody of the minor children to the petitioner;
- B. Granting periods of physical placement to the parties, with primary physical placement awarded to the petitioner;
- C. Prohibiting the removal of the minor children from the court's jurisdiction or interference with the parental rights of the petitioner in any other way;
- D. Requiring the respondent to pay child support for the minor children;
- E. Requiring both parties to maintain the named beneficiaries on any health or life insurance policy or plan;
- F. Requiring immediate automatic income assignment, pursuant to Wis. Stat. § 767.75;
- G. Requiring the respondent to pay the expenses and attorney fees incurred by the petitioner in bringing this action;
- H. Requiring both parties to pay toward debts or perform other actions in relation to the parties' persons or property;

**FILED**

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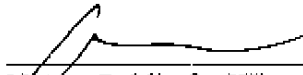
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- I. Prohibiting both parties from disposing of assets within the court's jurisdiction;
- J. Prohibiting both parties from imposing any restraints on the other spouse's personal liberty;
- K. Restraining both parties from coming upon the residence occupied by the other without permission; and,
- L. For such further relief as the court or family court commissioner may deem just and reasonable under the circumstances.



Jennifer Howe Saults McKinney

Subscribed and sworn to before me  
 this 27<sup>th</sup> day of March, 2012.

  
 \_\_\_\_\_  
 Notary Public for Wisconsin.  
 My commission: expires 2/18/13

FILED

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 MONROE COUNTY WISCONSIN