

DR20382383

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FILED

2021 MAR -3 P 1:38

CLERK OF COURTS
CUYAHOGA COUNTY

IN THE COURT OF COMMON PLEAS
DOMESTIC RELATIONS DIVISION
CUYAHOGA COUNTY, OHIO

ORIGINAL
COURT DOCKET
MAR -3 2021
CUYAHOGA COUNTY
CLERK OF COURTS

ALLISON HORNER

:

CASE NO. DR 20 382383

:

Plaintiff

:

JUDGE TONYA R. JONES

:

-VS-

:

WILLIAM HORNER

:

DEFENDANT'S MOTION TO

:

HOLD PLAINTIFF IN CONTEMPT OF COURT

:

Defendant

:

Now comes Defendant, **WILLIAM HORNER**, by Pro se representation, and respectfully requests this Honorable Court hold Plaintiff in contempt for violations of this Court's mutual restraining order issued August 24th, 2020.

Plaintiff has attempted to change the agent of record on the daughter's cash value life insurance policy in direct violation of point five (5) of Your Honor's order (exhibit A.) Plaintiff has failed to show cause why she is incapable of producing her own proof of insurance certificates after 1) being motioned in this Court to do so, 2) being requested to do so through evidence discovery procedures made as part of her motion to revisit temporary child support matters, and 3) being requested to show cause as to why she cannot produce the letters of insurance coverage. These facts taken together provide strong evidence that the Plaintiff has allowed her policies to lapse and is now trying to obfuscate this fact from the Court.

If the Plaintiff has let her life insurance policies lapse, there is nearly \$1million in financial protections no longer available for the children. Now the Plaintiff is attempting to alter [REDACTED]

~\$1million in protection without seeking buy in from Defendant who is an equal co-owner in the policy.

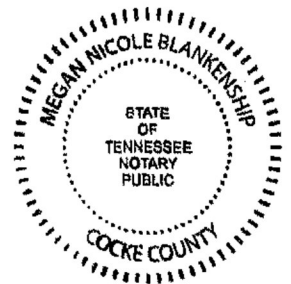
Taken together, the Plaintiff is in violation of point five (5) of this Court's order to a confirmed total of \$1million and a suspected total of nearly \$2million dollars with direct impact on the financial wellbeing of the children.

WHEREFORE, Defendant respectfully requests this Honorable Court hold Plaintiff in contempt for violation of Your Honor's orders and take appropriate actions to prevent further financial damage from being wrought against the children.

Respectfully Submitted,

William E. Horner - Date: 3/2/2021

William E. Horner
2551 Indian Trail
Morristown, TN 37814
(919) 446-5985
williamehorner@gmail.com
Pro se Representative



Notary Public

Megan Nicole Blankenship Date: 03-02-2021
Megan Nicole Blankenship (Name)
Comm: 04-21-2021

CERTIFICATE OF SERVICE

A copy of the foregoing **DATE OF COMPLETION ON ORDERED ITEMS** was served upon Robert A. Marcis, Attorney for Plaintiff, via email at rmarcis@marcislaw.com on this 2nd day of March 2021.

easton.horner@millennialbrokers.tech

From: Rich Burchill <rich@burchillcpa.com>
Sent: Monday, March 1, 2021 5:12 PM
To: easton.horner@millennialbrokers.tech
Subject: Notification of Agent Change

Importance: High

Easton,
Per your request, I am notifying you of a communication I received from MassMutual about a policy you co-own. Please see below:

General Information

Policy Number:	22650645 (VNTG1)	Insured Name:	ROBIN HORNER	Request:
Receive Date:	3/1/2021	Complete Date:	3/8/2021	Status:
Requestor:	Owner or Investor	Requestor Name:	Allison Horner	Requestor Phone Number:

Comments

3/1/2021 4:14 PM (Eastern Standard Time)

EMAIL: [REDACTED]

22650645

Please update servicing agent to Angelo Carcioppolo [REDACTED]

Thanks,

L. Mancarella

Extended
Comments:

Exhibit A.