



FD-13-3593

Hammond

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

SEP 18 2013

TIM RHODES
COURT CLERK

32

IN RE THE MARRIAGE OF:

JANA MICHELLE MARTIN COYNE)

Petitioner,)

vs.)

WAYNE MICHAEL COYNE,)

Respondent.)

FD-2013-3593

CASE NO.: FD-2013-

JUDGE: _____

PETITION FOR DISSOLUTION OF MARRIAGE

COMES NOW the Petitioner, Jana Michelle Martin Coyne, and for her cause of action against Respondent, Wayne Michael Coyne, alleges and states as follows:

1. Respondent is a resident of Oklahoma County, Oklahoma, and has resided here for more than six (6) months next preceding the filing of this Petition.
2. Petitioner and Respondent formed a common law marriage on February 4, 1989 and since that date have been husband and wife.
3. The Petitioner is entitled to a divorce from Respondent because they have reached a state of total irreconcilable incompatibility.
4. There are no minor children born of this marriage.
5. The Petitioner is not now pregnant.
6. Petitioner and Respondent have accumulated certain real property, intellectual property, and personal property during their marriage which should be identified, quantified and equitably divided.
7. Petitioner and Respondent have accumulated certain debts during their marriage which should be identified, quantified and equitably divided.

8. The parties should continue the payment of all existing debts and obligations of themselves incurred during the marriage, or make satisfactory arrangements with creditors as to such payments.

9. Petitioner should be awarded temporary and permanent support alimony in an amount to keep her living in the lifestyle to which she has become accustomed.

WHEREFORE, Petitioner prays that she be divorced from Respondent; that Petitioner receive a fair and reasonable property settlement; that the parties should continue the payment of all existing debts and obligations of themselves incurred during the marriage, or make satisfactory arrangements with creditors as to such payments; and grant Petitioner all further relief to which she is entitled.

Respectfully submitted,

ATTORNEYS LIEN CLAIMED



NICHOLLE JONES EDWARDS, OBA #17394

ROBERT K. CAMPBELL, OBA #21623

MULLINS, HIRSCH, EDWARDS,

HEATH, WHITE & MARTINEZ, P.C.

100 Park Avenue, Suite 400

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405/235-2335

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ATTORNEY FOR PETITIONER

VERIFICATION

STATE OF OKLAHOMA)
)
COUNTY OF OKLAHOMA) ss.

Jana Michelle Martin Coyne, of lawful age, being first duly sworn on oath, deposes and says:

That she has read the within and foregoing document and that the statements therein contained are true and correct as she verily believes under penalty of perjury.



Jana Michelle Martin Coyne

SWORN TO AND ACKNOWLEDGED BEFORE ME this the 13 day of
September, 2013.

(SEAL)



NOTARY PUBLIC



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