

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

NO. DF-15-09887-S

IN THE INTEREST OF	§	IN THE DISTRICT COURT
	§	
JA.D.Y. AND JU.D.Y.	§	255TH JUDICIAL DISTRICT
	§	
CHILDREN	§	DALLAS COUNTY, TEXAS

FIRST AMENDED PETITION TO MODIFY THE PARENT-CHILD RELATIONSHIP

1. Discovery Level

Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure.

2. Parties and Order to Be Modified

This suit to modify a prior order is brought by Anne Georgulas, Petitioner. The last three numbers of Anne Georgulas' driver's license number are 439. The last three numbers of Anne Georgulas' Social Security number are 570. Petitioner is the mother of the children and has standing to bring this suit. The requested modification will be in the best interest of the children.

Respondent is Jeffrey Damon Younger.

The order to be modified is entitled the "Order in Suit Affecting The Parent-Child Relationship," heard on final trial before this Court on October 18, 2016 and signed on November 9, 2016 (the "Order").

3. Jurisdiction

This Court has continuing, exclusive jurisdiction of this suit.

4. Children

The following children are the subject of this suit:

Name:	Ja.D.Y. ("James Damon Younger")
Sex:	Male
Birth date:	05.07.2012
County of residence:	Dallas

Name: **Ju.D.Y. ("Jude Daniel Younger")**
Sex: Male
Birth date: 05.07.2012
County of residence: Dallas

5. *Service*

Service may be had by serving counsel of record, Logan Odeneal, Odeneal & Odeneal Two Energy Square, 4849 Greenville Avenue, Suite 1111, Dallas, Texas 75206.

6. *Children's Property*

There has been no change of consequence in the status of the children's property since the prior order was rendered.

7. *Protective Order Statement*

No protective order under title 4 of the Texas Family Code, under Chapter 7A of the Texas Code of Criminal Procedure, or an order for emergency protection under Article 17.292 of the Texas Code of Criminal Procedure is in effect, and no application for a protective order is pending with regard to the parties to this suit or the children of the parties to this suit.

8. *Modification of Possession and Access*

The order to be modified is not based on a mediated or collaborative law settlement agreement. The circumstances of the children, a conservator, or other party affected by the order to be modified have materially and substantially changed since the date of rendition of the order to be modified.

Luna

Specifically, James is a gender expansive¹ or transgender child and, by choice, now goes by the name Luna and is only known by her classmates as a girl. In the Order, the Petitioner/Mother was given the exclusive right, after notifying the Father, to consent to psychiatric and psychological treatment of the children. The Mother sought proper psychological treatment for the child and kept the Father fully informed.

In response to Luna's choices, the Father has engaged in increasingly aggressive behavior, including physical force, toward the Mother. His actions are clearly intended to threaten and intimidate the Mother. Further, the Father has engaged in emotionally abusive behavior toward the child (as example only, haircutting and other non-affirming actions). Although unclear if this behavior rises to the level of family violence at this time, the Father's aggression is becoming more

¹ Gender expansive is a term, which is an adjective used to describe people that identify or express themselves in ways that broaden the culturally defined behavior or expression associated with one's natal gender.

common and more intense.

Due to the material and substantial changes of circumstances, Petitioner requests that the terms and conditions for access to or possession of the children be modified to provide as follows:

1. Child's Choices Expressed to the Court. Ordering an interview of the children, Luna (James) and Jude, with Family Court Services and a report to be provided to the Court and parties.
2. Amicus Attorney. Ordering the appointment of an Amicus Attorney to provide legal services necessary to assist the court in protecting the child's best interest.
3. Cutting Hair. Enjoining Father from cutting the hair of the children.
4. Possession, Psychological Treatment of Luna and Actions Outside the Home. Entering Orders requiring Father to affirm Luna and honor her choices, both inside and outside the home.
 - (1) Limiting Father's consecutive overnight possession of both children and/or supervising Father's possession if he fails to affirm Luna.
 - (2) Enjoining Non-Affirming Behavior. Enjoining Father from engaging in non-affirming behavior and/or taking Luna outside the home as James, or allowing others to do so.
 - (3) School Nights. Modifying Father's possession on school nights when there are school-related activities that may occur during Father's possession.
5. Educational Classes/Counseling. Ordering Father to attend counseling and/or educational classes associated with being the parent of a transgender child or a potentially transgender child. Specifically, a class that educates Father how his actions and non-affirming behavior could be harmful to the child's emotional and well-being.
6. Electronic Communication. Keeping the electronic communication language from the SAPCR Order but also enjoining Father from condemning Mother or the children or hanging up if they (Mother, Luna or Jude) use the name Luna, use female pronouns or refer to Luna as a girl, sister, etc.
7. Monthly Payment of Unreimbursed Medical. Ordering the Father to pay a set amount of unreimbursed medical expenses for counseling for the child on a monthly basis, to be withheld from his paycheck.

The requested modification is in the best interest of the children.

9. *Request for Temporary Orders*

Petitioner requests the Court, after notice and hearing, to make temporary orders for the safety and welfare of the children, including but not limited to the following:

1. Child's Choices Expressed to the Court. Ordering an interview of the children, Luna (James) and Jude, with Family Court Services and a report to be provided to the Court and parties.
2. Amicus Attorney. Ordering the appointment of an Amicus Attorney to provide legal services necessary to assist the court in protecting the child's best interest.
3. Cutting Hair. Enjoining Father from cutting the hair of the children.
4. Possession, Psychological Treatment of Luna and Actions Outside the Home. Entering Orders requiring Father to affirm Luna and honor her choices, both inside and outside the home.
 - (1) Limiting Father's consecutive overnight possession of both children and/or supervising Father's possession if he fails to affirm Luna.
 - (2) Enjoining Non-Affirming Behavior. Enjoining Father from engaging in non-affirming behavior and/or taking Luna outside the home as James, or allowing others to do so.
 - (3) School Nights. Modifying Father's possession on school nights when there are school-related activities that that may occur during Father's possession.
5. Educational Classes/Counseling. Ordering Father to attend counseling and/or educational classes associated with being the parent of a transgender child or a potentially transgender child. Specifically, a class that educates Father how his actions and non-affirming behavior could be harmful to the child's emotional and well-being.
6. Electronic Communication. Keeping the electronic communication language from the SAPCR Order but also enjoining Father from condemning Mother or the children or hanging up if they (Mother, Luna or Jude) use the name Luna, use female pronouns or refer to Luna as a girl, sister, etc.
7. Ordering Respondent to produce the following:
 - a. Respondent's 2016 and 2017 federal income tax returns with all attachments;
 - b. All year end pay information for 2017;
 - c. all payroll stubs, vouchers, commission checks, and records of commissions and all written records or evidence of income received by Respondent from any source, including but not limited to 1099s, K-1s, W-2s, extension requests, for the period

beginning January 1, 2017 through the date of production; and
d. A Financial Information Sheet, in the form attached hereto.

8. Ordering Respondent to pay reasonable interim attorney's fees and expenses.

10. *Request for Permanent Injunction*

Petitioner requests the Court, after trial on the merits, to grant an additional injunction as follows:

1. Cutting Hair. Enjoining the Respondent from cutting the hair of the children.
2. Enjoining Jeff from signing Luna up as James for any activities or taking her as James or calling her James or using male pronouns related to Luna at any activities outside the home, including but not limited to school and extracurricular or school activities.
3. Enjoining Jeff from allowing the children to remain in the presence of anyone who is not calling Luna by her chosen name, "Luna," not using female pronouns to refer to her and otherwise not affirming Luna.

11. *Dallas County Family District Courts General Orders*

The Court should order that the Dallas County Family District Courts General Orders – Dallas County Standing Order Regarding Children, Pets, Property and Conduct of the Parties, attached hereto, remain in full force and effect throughout the pendency of this action unless otherwise expressly Ordered.

12. *Request for Attorney's Fees, Expenses, Costs, and Interest*

It was necessary for Petitioner to secure the services of Kim M. Meaders, a licensed attorney, to preserve and protect the children's rights. Respondent should be ordered to pay reasonable attorney's fees, expenses, and costs through trial and appeal, and a judgment should be rendered in favor of this attorney and against Respondent and be ordered paid directly to Petitioner's attorney, who may enforce the judgment in the attorney's own name. Petitioner requests post judgment interest as allowed by law.

13. *Prayer*

Petitioner prays that citation and notice issue as required by law and that the Court enter its orders in accordance with the allegations contained in this petition.

Petitioner prays that, on final hearing, the Court enter a permanent injunction enjoining Respondent, in conformity with the allegations of this petition, from the acts set forth above.

Petitioner prays for attorney's fees, expenses, costs, and interest as requested above.

Petitioner prays for general relief.

Respectfully submitted,


Palmer & Manuel, PLLC
Campbell Centre I, Suite 1111
8350 North Central Expressway
Dallas, Texas 75206
Tel: (214) 242-6439
Fax: (214) 891-7071

By: 

Kim M. Meaders
State Bar No. 05352500
kmeaders@pamlaw.com
Attorney for Petitioner Anne Georgulas

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on July 2, 2018.



Kim M. Meaders
Attorney for Petitioner

F2017/01

DALLAS COUNTY FAMILY DISTRICT COURT
GENERAL ORDERS
(Revised January 5, 2017)

**DALLAS COUNTY STANDING ORDER REGARDING CHILDREN, PETS,
PROPERTY AND CONDUCT OF THE PARTIES**

No party to this lawsuit has requested this order. Rather, this order is a standing order of the Dallas County District Courts that applies in every divorce suit and every suit affecting the parent-child relationship filed in Dallas County. The District Courts of Dallas County giving preference to family law matters have adopted this order because the parties, their children and the family pets should be protected and their property preserved while the lawsuit is pending before the court. Therefore, it is **ORDERED**:

1. **NO DISRUPTION OF CHILDREN.** All parties are **ORDERED** to refrain from doing the following acts concerning any children who are subjects of this case:

1.1 Removing the children from the State of Texas for the purpose of changing residence, acting directly or in concert with others, without the written agreement of both parties or an order of this Court.

1.2 Disrupting or withdrawing the children from the school or day-care facility where the children are presently enrolled, without the written agreement of both parents or an order of this Court.

1.3 Hiding or secreting the children from the other parent or changing the children's current place of abode, without the written agreement of both parents or an order of this Court.

1.4 Disturbing the peace of the children.

1.5 Making disparaging remarks regarding the other party in the presence or within the hearing of the children.

2. **PROTECTION OF FAMILY PETS OR COMPANION ANIMALS.** All parties are **ORDERED** to refrain from harming, threatening, interfering with the care, custody, or control of a pet or companion animal, possessed by a person protected by this order or by a member of the family or household of a person protected by this order.

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

3.1 Using vulgar, profane, obscene, or indecent language, or a coarse or offensive manner to communicate with the other party, whether in person or in any other manner, including by telephone or another electronic voice transmission, video chat, social media, or in writing, or electronic messaging, with intent to annoy or alarm the other party.

3.2 Threatening the other party in person or in any other manner, including, by telephone or another electronic voice transmission, video chat, social media, or in writing, or electronic messaging, to take unlawful action against any person, intending by this action to annoy or alarm the other party.

3.3 Placing one or more telephone calls or text messages, at an unreasonable hour, in an

offensive or repetitious manner, without a legitimate purpose of communication, or anonymously with the intent to alarm or annoy the other party.

3.4 Intentionally, knowing or recklessly causing bodily injury to the other party or to a child of either party.

3.5 Threatening the other party or a child of either party with imminent bodily injury.

4. **PRESERVATION OF PROPERTY AND USE OF FUNDS DURING DIVORCE CASE.**

If this is a divorce case, both parties to the marriage are ORDERED to refrain from intentionally and knowingly doing the following acts:

4.1 Destroying, removing, concealing, encumbering, transferring, or otherwise harming or reducing the value of the property of one or both of the parties.

4.2 Falsifying a writing or record including an electronic record, relating to the property of either party.

4.3 Misrepresenting or refusing to disclose to the other party or to the Court, on proper request, the existence, amount, or location of any tangible or intellectual property of one or both of the parties, including electronically stored or recorded information.

4.4 Damaging or destroying the tangible or intellectual property of one or both of the parties, including any document that represents or embodies anything of value, and causing pecuniary loss to the other party, including electronically stored or recorded information.

4.5 Tampering with the tangible or intellectual property of one or both of the parties, including any document, electronically stored or recorded information, that represents or embodies anything of value, and causing pecuniary loss to the other party.

4.6 Selling, transferring, assigning, mortgaging, encumbering, or in any other manner alienating any of the property of either party, whether personal property or real property or intellectual property, and whether separate or community, except as specifically authorized by this order.

4.7 Incurring any indebtedness, other than legal expenses in connection with this suit, except as specifically authorized by this order.

4.8 Making withdrawals from any checking or savings account in any financial institution for any purpose, except as specifically authorized by this order.

4.9 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.

4.10 Withdrawing or borrowing in any manner for any purpose 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.

4.11 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.

4.12 Destroying, disposing of, or altering, any financial records of the parties, including canceled checks, deposit slips, and other records from a financial institution, a record of credit purchases or cash advances, a tax return, and a financial statement.

4.13 Destroying, disposing of, or altering any email, text message, video message, or chat message or social media 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.

4.14 Modifying, changing, or altering the native format or metadata of 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.

4.15 Deleting any data or content from any social network profile used or created by either party or a child of the parties.

4.16 Using any password or personal identification number to gain access to the other party's email account, bank account, social media account, or any other electronic account.

4.17 Taking any action to terminate or limit credit or charge cards in the name of the other party.

4.18 Entering, operating, or exercising control over the motor vehicle in the possession of the other party.

4.19 Discontinuing or reducing the withholding for federal income taxes on wages or salary.

4.20 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.

4.21 Excluding the other party from the use and enjoyment of the other party's specifically identified residence.

4.22 Opening or redirecting mail, email or any other electronic communication addressed to the other party.

5. **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. If this is a divorce case, both parties to the marriage are ORDERED to refrain from doing the following acts: Concealing or destroying any family records, property records, financial records, business records or any records of income, debts, or other obligations; falsifying any writing or record relating to the property of either party.

INSURANCE IN DIVORCE CASE. If this is a divorce case, both parties to the marriage are ORDERED to refrain from doing the following acts: 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, except as specifically authorized by this order. Changing or in any manner altering the beneficiary designation on any life insurance on the life of either party or the parties' children. Canceling, altering, or in any manner affecting any casualty, automobile, or health insurance policies insuring the parties' property or persons including the parties' minor children.

SPECIFIC AUTHORIZATIONS IN DIVORCE CASE. If this is a divorce case, both parties to the marriage are specifically authorized to do the following: To engage in acts reasonable and necessary to the conduct of that party's usual business and occupation; To make expenditures and incur indebtedness for reasonable attorney's fees and expenses in connection with this suit; To make expenditures and incur indebtedness for reasonable and necessary living expenses for food, clothing, shelter, transportation and medical care; To make withdrawals from accounts in financial institutions only for the purposes authorized by this order.

SERVICE AND APPLICATION OF THIS ORDER. The Petitioner shall attach a copy of this order to the original petition and to each copy of the petition. At the time the petition is filed, if the

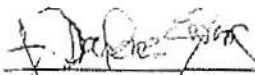
Petitioner has failed to attach a copy of this order to the petition and any copy of the petition, the Clerk shall ensure that a copy of this order is attached to the petition and every copy of the petition presented. This order is effective upon the filing of the original petition and shall remain in full force and effect as a temporary restraining order for fourteen days after the date of the filing of the original petition. If no party contests this order by presenting evidence at a hearing on or before fourteen days after the date of the filing of the original petition, this order shall continue in full force and effect as a temporary injunction until further order of the court. This entire order will terminate and will no longer be effective once the court signs a final order.


EFFECT OF OTHER COURT ORDERS. If any part of this order is different from any part of a protective order that has already been entered or is later entered, the protective order provisions prevail. Any part of this order not changed by some later order remains in full force and effect until the court signs a final decree.

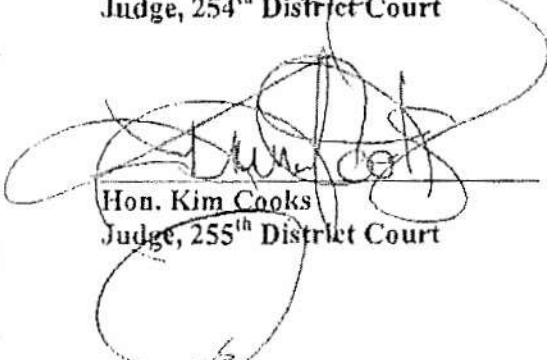
PARTIES ENCOURAGED TO MEDIATE. The parties are encouraged to settle their disputes amicably without court intervention. The parties are encouraged to use alternative dispute resolution methods, such as mediation or informal settlement conferences (if appropriate), to resolve the conflicts that may arise in this lawsuit.


BOND WAIVED. It is ORDERED that the requirement of a bond is waived.

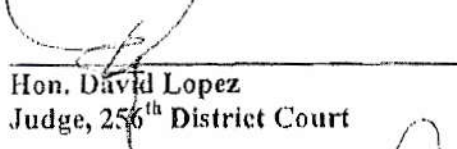
THIS DALLAS COUNTY STANDING ORDER REGARDING CHILDREN, PROPERTY AND CONDUCT OF PARTIES SHALL BECOME EFFECTIVE ON JANUARY 1, 2017.


Hon. J. Darlene Ewing
Judge, 254th District Court



Hon. Mary Brown
Judge, 301st District Court


Hon. Kim Cooks
Judge, 255th District Court


Hon. Tena Callahan
Judge, 302nd District Court


Hon. David Lopez
Judge, 256th District Court


Hon. Dennise Garcia
Judge, 303rd District Court


Hon. Andrea Plumlee
Judge, 330th District Court

CAUSE NO. DF 15-9887

IN THE MATTER OF:

Georgulas / Younger

IN THE 258th FAMILY DISTRICT

COURT OF DALLAS COUNTY, TEXAS.

ASSOCIATE JUDGE'S REPORT (Divorce/SAPCR)

Temporary _____ Final _____

Pursuant to an Order of Referral, a hearing in this matter has been held by a duly appointed Associate Judge as authorized by Chapter 201, Texas Family Code. The parties are hereby given notice of the findings and orders contained herein and of their right to be heard by a District Judge upon compliance with the terms of Chapter 201, Texas Family Code. A copy of this Report has been given to each party or the party's attorney who appeared at the hearing.

☐ AGREEMENT ☐ DEFAULT ☐ CONTESTED HEARING ☐ Reporter/Translator Present

(214) 890-7628

APPEARANCES: Husband/Father: _____

and Attorney: _____

Logan Odeneal

Wife/Mother: _____

and Attorney: _____

Kim Meaders (214) 891-7071

Other: _____

Amicus

and Attorney: _____

Stacy Dunlop (214) 272-3300

The Court rules per Exhibit A attached.

DF-15-08887

AJREP

ASSOCIATE JUDGE'S REPORT

1899284



Attorney for ☐ Husband/Father ☐ Wife/Mother ☐ _____ will reduce this Report to a written Order and submit to the other side and Court within fourteen (14) days.
☐ Orders require proof of submission to other side OR signature of all ☐ attorneys or ☐ parties for entry.

8-3-18

Date

Associate Judge

Agreed

Agreed

Agreed

Agreed

PAGE 1 OF 1

| SUBJECT TO PROOF OF SERVICE

(Rev. 06/10)

No. 15-9887
In the Interest of the Younger Children
Rulings
Exhibit A

An evaluation/assessment is to be performed by Dr. Alexandria Doyle regarding the following issues:

- Circumstances regarding gender identity of James/Luna.
- Any other circumstances that relate to the gender identity of James/Luna in Dr. Doyle's professional opinion.
- Recommendations from Dr. Doyle regarding the parenting of the children given the findings made by Dr. Doyle.

Parents are to contact Dr. Doyle by August 8, 2018 to schedule first appointment. (214) 361-5900.

Parents are to participate in the evaluation/assessment of James/Luna and take James/Luna to Dr. Doyle's office as requested by Dr. Doyle. Each parent is to pay 50% of the cost of the evaluation/assessment as billed by Dr. Doyle.

Pending the completion of the evaluation/assessment, the Court makes the following interim orders:

The parties are mutually enjoined from:

- Enrolling James/Luna in any activities which the child was not enrolled during the last school year.
- Taking any action that results in embarrassment or humiliation of the children.
- Addressing the children in any manner that embarrasses or humiliates the children.
- Discussing gender identification with the children in an effort to persuade James/Luna to accept a gender designation.
- Taking any action to notify any third party that the gender of James/Luna is different than the child's appearance before that third party.
- Dressing James/Luna inconsistently with the manner of dress for school/activities for the last school year. James/Luna is to continue being dressed for school and each particular activity as the child was dressed for school and that particular activity in the last school year.
- Discussing the litigation or disparaging the other party in the presence or hearing of the children.

The Court will consider orders permitting enrollment of James/Luna in new activities after completion of the assessment/evaluation.

The hair of James/Luna is to be worn in a manner that is normal for both a six year old boy and girl. Parties must obtain permission of the Amicus Attorney and follow the instructions of the Amicus Attorney regarding haircuts for the child.

If a school activity for the children is scheduled on a Thursday night, Father's possession on that Thursday night is abated. In lieu of the Thursday night possession, Father is to have possession of the children from 6 PM to 8 PM on the Wednesday that is the day before the Thursday on which the school activity is scheduled. Mother must give Father 14 days' notice of every instance where a school activity will occur on a Thursday night. This order does not affect the right of Father to attend the school activity on the Thursday night.

James/Luna is to continue in individual therapy with Rebekka Ouer. Each party is to pay 50% of all costs. Parents are to participate in individual therapy of James/Luna and take James/Luna to Ms. Ouer's office as requested by Ms. Ouer.

Mother's request for interim attorney's fees is denied.



JUDGE KIM COOKS

ASSOCIATE JUDGE SCOTT BEAUCHAMP

THE 255TH JUDICIAL FAMILY DISTRICT COURT

F A X D A T E : 8-3-18

From: Deborah Nelson, Coordinator
Phone: 214-653-6154
Fax: 214-653-6305
Subject:

To: Logan Odamea /
Kim Meade-S
Stacy Dunlop
Fax: (214) 890-7628
(214) 891-7071
Pages: 4 (214) 242-3300

Ruling ☒

Court Appointment []

Other []

Comments:

Georgulas / Younger 15-9887

TRANSMISSION VERIFICATION REPORT

TIME : 08/03/2018 11:55
 NAME :
 FAX :
 TEL :
 SER. # : BROL6J567659

DATE, TIME
 FAX NO./NAME
 DURATION
 PAGE(S)
 RESULT
 MODE

08/03 11:53
 #2148907628
 00:01:21
 04
 OK
 STANDARD
 ECM



JUDGE KIM COOKS

ASSOCIATE JUDGE SCOTT BEAUCHAMP

THE 255TH JUDICIAL FAMILY DISTRICT COURT

F A X D A T E : 8-3-18

From: Deborah Nelson, Coordinator
 Phone: 214-653-6154
 Fax: 214-653-6305
 Subject:

To: Logan Odessa /
 Kim Meadows
 Stacy Dailor
 Fax: (214) 890-7628
 (214) 891-7071
 Pages: 4 (214) 242-3300

Ruling ☒

Court Appointment []

Other []

Comments

Georgulas / Younger 15-9887

TRANSMISSION VERIFICATION REPORT

TIME : 08/03/2018 11:58
NAME :
FAX :
TEL :
SER.# : BR0L6J567659

DATE, TIME
FAX NO./NAME
DURATION
PAGE(S)
RESULT
MODE

08/03 11:56
#2148917071
00:01:36
04
OK
STANDARD
ECM



JUDGE KIM COOKS

ASSOCIATE JUDGE SCOTT BEAUCHAMP

THE 255TH JUDICIAL FAMILY DISTRICT COURT

F A X D A T E : 8-3-18

From: Deborah Nelson, Coordinator Phone: 214-653-6154 Fax: 214-653-6305 Subject:	To: Logan Odenra Kim Mendes Stacy Dnlop Fax: (214) 890-7628 (214) 891-7071 Pages: 4 (214) 242-3300
---	---

Ruling ☒

Court Appointment []

Other []

Comments:

Georgulas / Younger 15-9887

TRANSMISSION VERIFICATION REPORT

TIME : 08/03/2018 12:00
NAME :
FAX :
TEL :
SER.# : BROL6J567659

DATE, TIME
FAX NO./NAME
DURATION
PAGE(S)
RESULT
MODE

08/03 11:59
#2142423300
00:01:11
04
OK
STANDARD



JUDGE KIM COOKS

ASSOCIATE JUDGE SCOTT BEAUCHAMP

THE 255TH JUDICIAL FAMILY DISTRICT COURT

F A X D A T E : 8-3-18		
From: Deborah Nelson, Coordinator Phone: 214-653-6154 Fax: 214-653-6305 Subject:	To: Logan Odenra Kim Meadows Stacy Dailor Fax: (214) 890-7628 (214) 891-7071 Pages: 4 (214) 242-3300	
Ruling <input checked="" type="checkbox"/>	Court Appointment <input type="checkbox"/>	Other <input type="checkbox"/>

~~Comments~~

Georgulas/Younger 15-9887

Jeffery White

NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA

NO. DF-15-09887-S

IN THE INTEREST OF	§	IN THE DISTRICT COURT
	§	
JA.D.Y. AND JU.D.Y.	§	255 TH JUDICIAL DISTRICT
	§	
CHILDREN	§	DALLAS COUNTY, TEXAS

MOTION FOR EX PARTE TEMPORARY RESTRAINING ORDER

This Motion for Ex Parte Temporary Restraining Order is brought by Anne Georgulas (hereinafter "Petitioner" or "Mother"), who is the mother of the children Ja.D.Y. and Ju.D.Y. (hereinafter "the Children") and is a party affected by the Order sought to be modified as more specifically set forth in the *Order in Suit Affecting the Parent-Child Relationship* entered with this Court on November 9, 2016 (hereinafter "the Final Order") and subsequent Orders of the Court, including but not limited to the Associate Judge's Report dated August 3, 2018 (the "August 3, 2018 AJ Report"). The last three numbers of Petitioner's driver's license number are 439. The last three numbers of Petitioner's Social Security number are 570.

Respondent is the children's father, Jeffrey Damon Younger (hereinafter either "Respondent" or "Father"). The requested modification will be in the best interest of the Child.

I. Request for Temporary Restraining Order/Extraordinary Relief

As the basis for the extraordinary relief requested below, Petitioner would show that before the filing of this motion Respondent has engaged in the conduct stated in the affidavit of Anne Georgulas attached as Exhibit "A." The Affidavit and all exhibits attached thereto are incorporated herein fully. Based on that affidavit, Petitioner requests the Court to grant the following relief:

Petitioner requests the Court to dispense with the issuance of a bond, and Petitioner requests that Respondent be temporarily restrained immediately, without hearing, and after notice and hearing be temporarily enjoined, pending the further order of this Court, from:

1. Coming within 500 feet of the child's school, Pinkerton Elementary until further Order of this Court.
2. From talking to or having any contact with any third party related to the school (parents, students, teachers, administrators, etc.) until further Order of this Court.
3. Taking any action to notify any third party related to the school (parents, students, teachers, administrators, etc.) that the gender of Luna is different than a girl, named Luna.

2. *Prayer*


Petitioner prays that the Court grant the Temporary Restraining Order and that the Court, after notice and hearing, enjoin Respondent as contained herein.

Petitioner prays that the Court make all other and further orders that are pleaded for or that are deemed necessary for the safety and welfare of the children.

Petitioner prays for general relief.

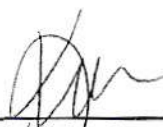
Respectfully submitted,

Palmer & Manuel, PLLC
Campbell Centre I, Suite 1111
8350 North Central Expressway
Dallas, Texas 75206
Tel: (214) 242-6439
Fax: (214) 891-7071

By: 
Kim M. Meaders
State Bar No. 05352500
kmeaders@pamlaw.com
Attorney for Petitioner Anne Georgulas

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on August 27, 2018.


Kim M. Meaders
Attorney for Petitioner

NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA

NO. DF-15-09887-S

IN THE INTEREST OF
JA.D.Y. AND JU.D.Y.
CHILDREN

§ IN THE DISTRICT COURT
§
§ 255TH JUDICIAL DISTRICT
§
§ DALLAS COUNTY, TEXAS

Affidavit of Anne Georgulas

Anne Georgulas appeared before me in person today and stated under oath as follows:

"My name is Anne Georgulas. I am above the age of eighteen years, and I am fully competent to make this affidavit. I have personal knowledge of the facts stated herein and they are all true and correct.

"I am the Petitioner in this case.

"I am requesting that the Court enter an Emergency Ex Parte Temporary Restraining Order against Respondent, Jeffrey Damon Younger ("Jeff"), based on the following facts:

1. After several hearings in this matter, Judge Beauchamp issued temporary orders on 8.3.18.
2. Specifically, the Judge ordered:

The hair of James/Luna is to be worn in a manner that is normal for both a six year old boy and girl. Parties must obtain permission of the Amicus Attorney and follow the instructions of the Amicus Attorney regarding haircuts of the child. See Exhibit 1.
3. The first possession that Jeff had after entry of that order, the weekend of August 17-19, 2018, Jeff cut Luna's hair. Luna's hair was already a fairly short boy cut, but was cut even shorter.
4. Jeff did not get permission from the Amicus Attorney to cut Luna's hair. See Exhibit 2.
5. Jeff knowingly directly violated a Court Order by cutting Luna's hair without the permission of the Amicus Attorney. The pictures attached show Luna's hair was just over her ears before the August 17th weekend (Exhibits 3, 4, and 5) and cut and partially shaved approximately ¼ inch above her ear after the weekend (see Exhibits 6 and 7).

6. Furthermore the Judge ordered:

The parties are mutually enjoined from:


- a. Taking any action that results in embarrassment or humiliation of the children.
 - b. Addressing the children in any manner that embarrasses or humiliates the children.
 - c. Taking any action to notify any third party that the gender of James/Luna is different than the child's appearance before that third party.
7. In addition to cutting Luna's hair, Jeff has directly violated the order as stated in 6.a. and 6.b. above.
8. During a Face Time call on 8.20.18, Jeff was bullying Luna and making her feel worse about her hair. I asked him to stop bullying Luna and Jeff replied, "no." See Exhibit 8.
9. Jeff knowingly is continuing to violate the Court Order by embarrassing and humiliating and bullying Luna about her hair. He continues to shame her and intimidate her.
10. Luna has been hurt by his actions and words and has expressed this.
11. Jeff continues to directly and indirectly engage in behavior that is shaming and embarrassing, or at least uncomfortable, to Luna. On the evening of August 21, 2017, Jeff told Jude in front of Luna [on Face Time], "Soccer is a great game to prepare you for Rugby. Rugby is a real man's sport." Then Jeff repeatedly asked Luna, in several different ways, why she no longer wanted to play soccer. Luna was noticeably uncomfortable.

Concern About an Upcoming Event


12. On August 30, 2018, there is an event at the child's school, Pinkerton Elementary. It is "Curriculum Night" which is attended only by parents, not the students. Although Jeff has rarely ever attended any events at the child's school, he has voiced his intention of attending this event. I am genuinely concerned that Jeff will intentionally embarrass Luna and talk to other parents and try to inform them that Luna is "his son," that he has "two twin boys, James and Jude," etc.
13. Luna has only attended Pinkerton as a girl, named "Luna," who wears girl's clothing and lines up in the girl's line. Therefore, if Jeff engaged in that type of behavior it would violate 6.a. and 6.c. as set forth above. It would be notifying these third parties that Luna's gender is different than the only way she has ever appeared to them.

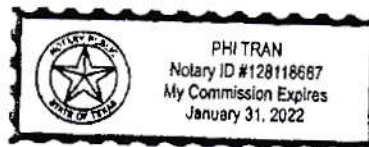
14. In an effort to seek assurances that Jeff would not engage in this behavior, a letter was sent to his lawyer on August 17, 2018 to seek confirmation that Jeff would only refer to Luna at this or any school event as "Luna" and only call her a girl or using girl pronouns. See Exhibit 9. The letter has been ignored.
15. After getting that letter, Jeff violated the order and cut Luna's hair. Jeff has shown that he will ignore the orders and do as he wants.
16. Jeff has never previously shown any interest in attending these events and is doing so only to make sure they know this is his son.
17. I am very concerned that Jeff will continue to violate the orders and try to "out" Luna at the school event on 8.30.18. This would cause immediate and irreparable harm to her and damage. It might force her to even want to change schools. This would not only hurt Luna, it would hurt Jude as well. They have the same classmates, mutual friends and Jude would likely have to change schools too. Jeff should not be allowed to continue this treatment, manipulation and control.
18. Therefore, I am asking this court to grant an ex parte Temporary Restraining Order to prohibit Jeff from attending this event or any school event until further Court order.
19. I will be willing to provide all information I gather from this event to Jeff.

Further Affiant sayeth naught.


Anne Georgulas

SIGNED under oath before me on August 24, 2018.


Notary Public, State of Texas



PETITIONER'S/
MOTHER'S

EXHIBIT



JUDGE KIM COOKS

ASSOCIATE JUDGE SCOTT BEAUCHAMP

THE 255TH JUDICIAL FAMILY DISTRICT COURT

F A X D A T E :

8-3-18

From: Deborah Nelson, Coordinator
Phone: 214-653-6154
Fax: 214-653-6305
Subject:

To: Logan Odenra /
Kim Meadows
Stacy D. 108
Fax: (214) 890-7028
(214) 891-7071
Pages: 4 (214) 242-3300

Ruling ☒

Court Appointment []

Other []

Comments:

Georgulas / Younger 15-9887

CAUSE NO. DF 15-9887

IN THE MATTER OF:

Georgulas / Younger

IN THE 255TH FAMILY DISTRICT
COURT OF DALLAS COUNTY, TEXAS.

ASSOCIATE JUDGE'S REPORT (Divorce/SAPCR)

Pursuant to an Order of Referral, a hearing in this matter has been held by a duly appointed Associate Judge as authorized by Chapter 201, Texas Family Code. The parties are hereby given notice of the findings and orders contained herein and of their right to be heard by a District Judge upon compliance with the terms of Chapter 201, Texas Family Code. A copy of this Report has been given to each party or the party's attorney who appeared at the hearing.

[] AGREEMENT [] DEFAULT [] CONTESTED HEARING [] Reporter/Translator Present

APPEARANCES: Husband/Father: —

and Attorney: Logan Odencal

Wife/Mother: —

and Attorney: Kim Meade-S

Others: Amicus

and Attorney: Stacy Dunlop

The Court rules per Exhibit A attached.

Attorney for [] Husband/Father [] Wife/Mother [] will reduce this Report to a written Order and submit to the other side and Court within fourteen (14) days.
[] Orders require proof of submission to other side OR signature of all [] attorneys or [] parties for entry.

Date 8-3-18

[Signature]
Associate Judge

Agreed 1

Agreed 1

Agreed 1

Agreed 1

PAGE 1 OF 1

[] SUBJECT TO PROOF OF SERVICE

(Rev. 06/10)

No. 15-9887
In the Interest of the Younger Children
Rulings
Exhibit A

An evaluation/assessment is to be performed by Dr. Alexandria Doyle regarding the following issues:

- Circumstances regarding gender identity of James/Luna.
- Any other circumstances that relate to the gender identity of James/Luna in Dr. Doyle's professional opinion.
- Recommendations from Dr. Doyle regarding the parenting of the children given the findings made by Dr. Doyle.

Parents are to contact Dr. Doyle by August 8, 2018 to schedule first appointment. (214) 361-5900.

Parents are to participate in the evaluation/assessment of James/Luna and take James/Luna to Dr. Doyle's office as requested by Dr. Doyle. Each parent is to pay 50% of the cost of the evaluation/assessment as billed by Dr. Doyle.

Pending the completion of the evaluation/assessment, the Court makes the following interim orders:

The parties are mutually enjoined from:

- Enrolling James/Luna in any activities which the child was not enrolled during the last school year.
- Taking any action that results in embarrassment or humiliation of the children.
- Addressing the children in any manner that embarrasses or humiliates the children.
- Discussing gender identification with the children in an effort to persuade James/Luna to accept a gender designation.
- Taking any action to notify any third party that the gender of James/Luna is different than the child's appearance before that third party.
- Dressing James/Luna inconsistently with the manner of dress for school/activities for the last school year. James/Luna is to continue being dressed for school and each particular activity as the child was dressed for school and that particular activity in the last school year.
- Discussing the litigation or disparaging the other party in the presence or hearing of the children.

The Court will consider orders permitting enrollment of James/Luna in new activities after completion of the assessment/evaluation.

The hair of James/Luna is to be worn in a manner that is normal for both a six year old boy and girl. Parties must obtain permission of the Amicus Attorney and follow the instructions of the Amicus Attorney regarding haircuts for the child.

If a school activity for the children is scheduled on a Thursday night, Father's possession on that Thursday night is abated. In lieu of the Thursday night possession, Father is to have possession of the children from 6 PM to 8 PM on the Wednesday that is the day before the Thursday on which the school activity is scheduled. Mother must give Father 14 days' notice of every instance where a school activity will occur on a Thursday night. This order does not affect the right of Father to attend the school activity on the Thursday night.

James/Luna is to continue in individual therapy with Rebekka Ouer. Each party is to pay 50% of all costs. Parents are to participate in individual therapy of James/Luna and take James/Luna to Ms. Ouer's office as requested by Ms. Ouer.

Mother's request for interim attorney's fees is denied.

PETITIONER'S/
MOTHER'S

EXHIBIT 2

From: Stacy Dunlop [mailto:stacy@dunloplawfirm.com]
Sent: Monday, August 20, 2018 9:14 AM
To: Anne Georgulas
Cc: Kim Meaders
Subject: Re: Did Jeff ask permission to cut Luna's Hair?

Not that I am aware of. Today is my first day back from vacation.
I've not yet gotten through all of my emails or voicemail messages.
But I can confirm that I have not spoken to Mr. Younger since our last hearing.
And at that time, we did not discuss anything about haircuts for either of the children.

Also, would you please cc your attorney on all emails to me so that we can keep her in the loop.
I will try to remember to do so on my end too.
Thank you.

PLEASE TAKE NOTE OF MY NEW ADDRESS.

Stacy A. Dunlop
The Dunlop Law Firm
2201 Main St., Suite 770
Dallas, Texas 75201
(214) 550-1143 office
(214) 242-3300 fax
stacy@dunloplawfirm.com

THIS MESSAGE IS INTENDED TO BE PRIVILEGED AND CONFIDENTIAL AND IS PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE. The information contained herein is intended for the exclusive use of the individual or entity named in this email. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this message in error, please promptly reply to the sender that you have received it in error and immediately delete it. This communication does not reflect an intention by the sender or the sender's client or principal to conduct a transaction or make any agreement by electronic means or to constitute an electronic signature. Thank you.

On Aug 19, 2018, at 4:57 PM, Anne Georgulas <anne.georgulas@gmail.com> wrote:

Stacy,

Did Jeff ask permission to cut Luna's Hair?

PETITIONER'S/
MOTHER'S

EXHIBIT 3

PETITIONER'S/
MOTHER'S

EXHIBIT 4



PETITIONER'S/
MOTHER'S

EXHIBIT 5

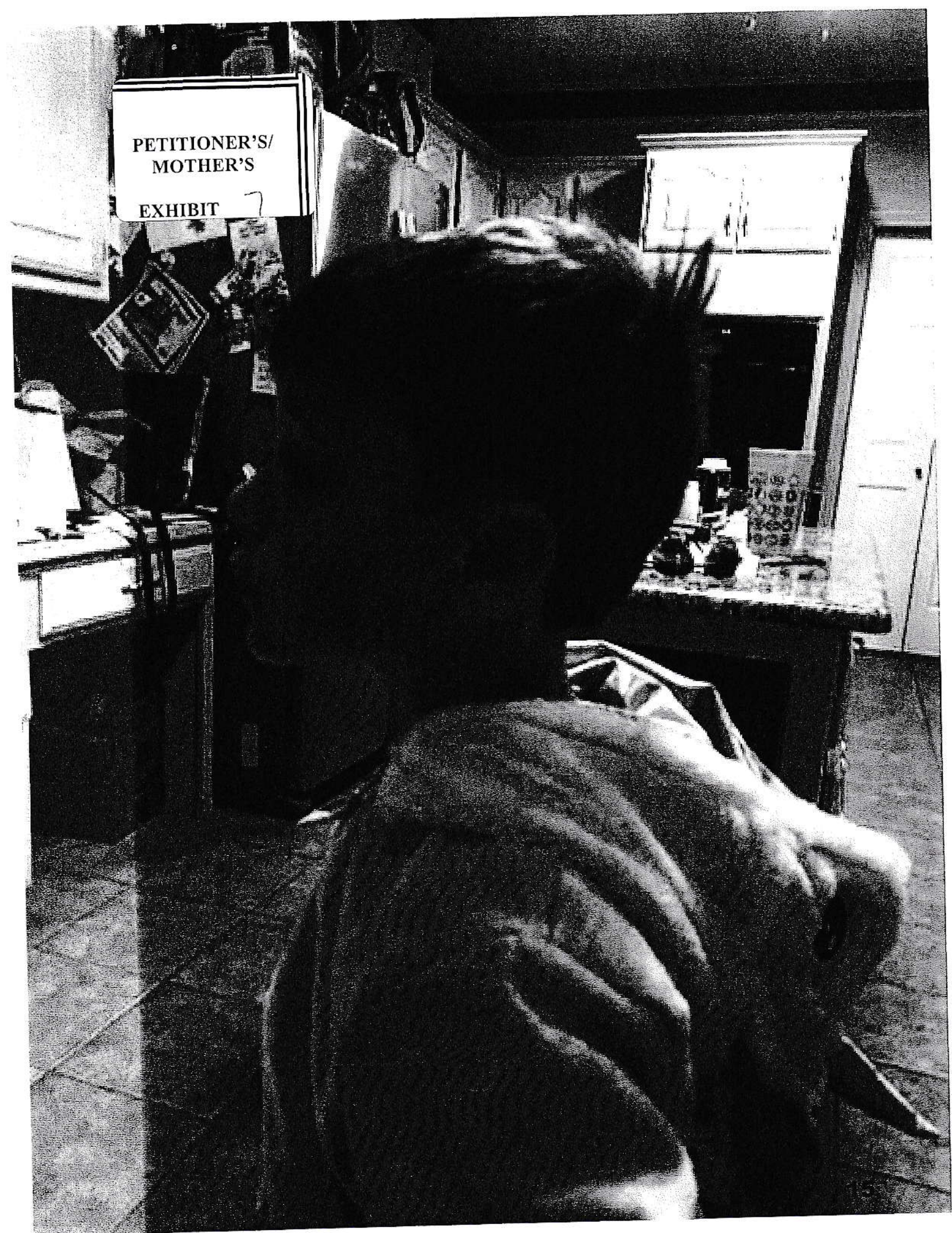


PETITIONER'S/
MOTHER'S

EXHIBIT 6

PETITIONER'S/
MOTHER'S

EXHIBIT 7



----- Forwarded message -----

From: Jeff <jeff.younger@gmail.com>

Date: Mon, Aug 20, 2018 at 7:27 PM

Subject: Re: Fortnite on FaceTime

To: Anne Georgulas <anne.georgulas@gmail.com>

No.

On Mon, Aug 20, 2018 at 7:16 PM Anne Georgulas <anne.georgulas@gmail.com> wrote:

Jeff,

Fortnite is not allowed at my house, so please don't show Jude or Luna Fortnite while on FaceTime.

I also request you stop bullying Luna on FaceTime. When you ask her if everyone at school liked her haircut, you probably noticed she didn't answer. She herself does not like her haircut. Please stop making her feel worse about herself than you already have.

Anne

--
Jeff

PALMER ★ MANUEL

A Texas Law Firm

August 17, 2018

PETITIONER'S/
MOTHER'S

EXHIBIT 9

Logan Odeneal
Odeneal & Odeneal
Two Energy Square
4849 Greenville Avenue, Suite 1111
Dallas, Texas 75206

via email to odeneal@sbcglobal.net

Re: Cause No. DF-15-09887; *In the Interest of James Damon Younger and Jude Daniel Younger, Children*; in the 255th Judicial District Court of Dallas County, Texas

Dear Mr. Odeneal:

On August 30, 2018, there is a school event at Pinkerton Elementary School, the school attended by Jude and Luna. Luna has only ever attended Pinkerton as "Luna," a girl, who wears girl's clothing to school, who lines up in the girl's line and is known by her classmates, teachers and their parents as a girl named Luna.

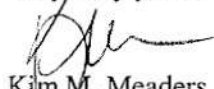
It would obviously be very embarrassing for Luna if Jeff talked to other parents and/or the teachers and told them "his son" is named James, not Luna, or that he has twin boys in first grade, etc. Or even if he referred to Luna as "he." Further, this would be confusing to the parents, teachers and other students. It would be notifying these third parties that Luna's gender is different than the only way she has ever appeared to them.

Such actions would be in violation of Judge Beauchamp's orders. Specifically, the parties were mutually enjoined from:

- Taking any action that results in embarrassment or humiliation of the children.
- Addressing the children in any manner that embarrasses or humiliates the children.
- Taking any action to notify any third party that the gender of James/Luna is different than the child's appearance before that third party.

Can you please confirm your client will only refer to Luna as "Luna," calling her only a girl, using female pronouns, etc. at this event or any other school events. Thank you for your cooperation in this matter.

Very truly yours,



Kim M. Meaders
Direct: (214) 242-6439
kmeaders@pamlaw.com

KMM:lcf

CC: Client (via email)
Stacy Dunlop (via email)
Dr. Alex Doyle (via email)

Palmer & Manuel, PLLC

REPRINTED RECEIPT
DALLAS COUNTY OFFICIAL RECEIPT FELICIA PITRE, DISTRICT CLERK

Payor
JOE SCOTT

Receipt No.
57038-2018-DCLK

Transaction Date
08/29/2018

Description		Amount Paid
Miscellaneous Payment		
	COPIES AND POSTAGE FEES	34.00
	SUBTOTAL	34.00
PAYMENT TOTAL		34.00
	CASH Tendered	34.00
	Total Tendered	34.00
	Change	0.00
08/29/2018 11:45 AM	Cashier Station DC46	Audit 62649812

REPRINTED RECEIPT