DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : JUNE \_\_, 20

**PLAINTIFF’S MOTION FOR CONTEMPT, POST-JUDGMENT**

The Plaintiff respectfully moves this Court to issue an order holding the Defendant in contempt for violating the terms of the Divorce Agreement and Judgment dated \_\_\_\_\_\_\_. As grounds therefore, the Plaintiff represents as follows:

1. The Parties’ Divorce Agreement dated \_\_\_\_\_\_\_ (entry no. \_\_\_\_) (“The Divorce Agreement”) was incorporated into the Court’s Orders on \_\_\_\_\_\_\_\_.
2. Section 3.1 of the Divorce Agreement provides that “the Wife shall have exclusive use of the home beginning June 1, 20\_\_.”
3. To date, the Defendant has failed to move out of the home pursuant to the Divorce Agreement, which required him to vacate the home by June 1, 20\_\_.
4. The Defendant’s conduct in failing to follow the Court Order is willful and intentional.

**WHEREFORE**, the Plaintiff respectfully requests that the Court enter the following orders:

1. The Defendant be found in contempt for violating the Court’s orders;
2. The Defendant be ordered, pursuant to paragraph 3.1 of the Divorce Agreement, to immediately vacate the home and grant the Plaintiff exclusive use of the home;
3. The Defendant pay the cost of bringing this Motion, including reasonable attorneys’ fees, as well as a “rental” fee for his overstay in the home; and
4. Any further order that the Court may deem fair and equitable.

THE PLAINTIFF

JOHN DOE

By: 441084

Matthew F. Dolan

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**ORDER FOR HEARING AND NOTICE**

The foregoing motion having been presented to this Court, it is hereby ordered that the Plaintiff/Defendant, ***insert name***, appear before a session of this Court to be held within and for the Judicial District of \_\_\_\_\_\_\_\_\_, at \_\_\_\_\_\_\_\_\_\_\_ Superior Court, ***insert address of court***, on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, and then and there to show cause why the relief requested in the attached motion and the prayers contained therein should not be granted.

Now therefore, by the authority of the State of Connecticut, you are hereby commanded to give notice of the pendency of the motion and this order to the Defendant and summon the Defendant to appear at the time and place of the hearing for the purposes above stated by leaving a true and attested copy of the motion, and this order with the Defendant, at least 12 days before the date of the hearing.

Hereof fail not due service and return make.

Dated at New Haven, CT, this \_\_\_ day of \_\_\_\_\_\_\_\_, \_\_\_\_\_\_.

BY THE COURT,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_