

No. D-1-GN-14-004290

Don Zimmerman,
Plaintiff,

vs.

**Austin Investigative Reporting Project
d/b/a The Austin Bulldog, and Ken
Martin;**
Defendants.

In the 53rd District Court
Travis County, Texas

Plaintiff's Original Petition

To the Honorable Judge of Said Court:

Now Comes Donald Zimmerman ("Zimmerman"), complaining of and about the Austin Investigative Reporting Project d/b/a The Austin Bulldog ("AIRP"), and Ken Martin ("Martin") (collectively, "Defendants"). Plaintiff's cause of action sounds in defamation, libel, and/or slander, and Plaintiff would show the following:

Discovery Control Plan Level

1. Pursuant to Rule 190.1 of the Texas Rules of Civil Procedure, Plaintiff intends to conduct discovery in this case under Level 3.

Parties and Service

2. Plaintiff Don Zimmerman is a resident of Travis County, Texas.
3. Defendant AIRP is a non-profit corporation whose registered agent is Ken Martin, a co-defendant, and has an address for service of process at 509 E. 8th Street, Austin, Texas 78705.
4. Defendant Ken Martin is a person residing in Travis County and can be served at 509 E. 8th Street, Austin, Texas 78705, the AIRP place of service.

Jurisdiction and Venue

5. The subject matter in controversy is within the jurisdictional limits of this Court. Venue is mandatory in Travis County under Texas Civil Practices and Remedies Code Section 15.017 because this suit involves libel and this is the county where Plaintiff resided when this claim accrued and Plaintiff so elects to prosecute this claim in Travis County.

Facts

6. Zimmerman is a resident of Travis County.
7. Zimmerman is a candidate for the Austin City Counsel, District 6, in the 2014 election cycle.
8. AIRP is a local weblog (“blog”) using an assumed business name of “The Austin Bulldog.” While the website “About” lists many “potential” authors, the primary author/editor contributing to the site is Ken Martin.
9. On October 9, 2014, at approximately 3:10 pm, Ken Martin published an article on his blog titled “Candidate Lost Custody Over Abuse.” A true and correct copy of the article is attached as Exhibit 1. An email teaser of the article came out on October 9, 2014, at approximately 4:42 pm. It bore the same title. A true and correct copy of the email teaser is attached as Exhibit 2.
10. Within both the email and the article are several defamatory, false statements. In addition, the email and article themselves, as a whole, convey a defamatory message.

Email Defamatory Statements

11. The email title “Candidate Lost Custody Over Abuse” is a false statement. Mr. Zimmerman did not “lose custody.” Texas is a state that utilizes the conservatorship model, and not the custody model. No abuse was ever testified to in court.
12. The email subtitle reads that that “District 6 Council candidate Don Zimmerman injured, alienated daughter, court records state.” This is a false statement. No court order or opinion of any kind ever states that Zimmerman alienated his daughter. You are demanded to retract that statement. Mr. Zimmerman never alienated his daughter.
13. The email states that Mr. Zimmerman had “permanent loss of parental rights through civil court action.” This is a false statement. Mr. Zimmerman did not “permanent[ly]” lose parental rights. This was repeated in the sidebar column to the email as well. Mr. Zimmerman is still a possessory conservator of his daughter. Permanent loss of parental rights prevents any parenting whatsoever.
14. The email states that the doctor reports literally state that Mr. Zimmerman “on separate occasions” “inflicted bruises, pulled Marina’s hair, pushed her, and ‘threatened to kill

her.” This is a false statement. At no point does the email express that these statements are not the doctor’s conclusions but are pure allegations, and that they are hearsay transcribed by the doctor.

Blog Defamatory Statements

15. The blog title “Candidate Lost Custody Over Abuse” is a false statement. Mr. Zimmerman did not “lose custody.” Texas is a state that utilizes the conservatorship model, and not the custody model. No abuse was ever testified to in court.
16. The blog subtitle reads that that “District 6 Council candidate Don Zimmerman injured, alienated daughter, court records state.” This is a false statement. No court order or opinion of any kind ever states that Zimmerman alienated his daughter. You are demanded to retract that statement. Mr. Zimmerman never alienated his daughter
17. The blog states that Mr. Zimmerman had “permanent loss of parental rights through civil court action.” This is a false statement. Mr. Zimmerman did not “permanent[ly]” lose parental rights. This is repeated in the sidebar column as well. Mr. Zimmerman is still a conservator of his daughter. Permanent loss of parental rights prevents any parenting whatsoever. .
18. The blog states that the doctor reports literally state that Mr. Zimmerman “on separate occasions” “inflicted bruises, pulled Marina’s hair, pushed her, and ‘threatened to kill her.” This is a false statement. At no point does the email express that these statements are not the doctor’s conclusions but are pure allegations, and that they are hearsay transcribed by the doctor.
19. The three statements regarding the doctor’s reports in the blog never state that the statements of alleged abuse by the doctor are repeated hearsay. It never makes the distinction that these are all reported by the daughter but never confirmed by any external investigation, and that the doctor’s opinion is based solely on the child’s allegations.
20. This has caused Plaintiff damages.

A. CLAIMS

Statutory and Common Law Defamation

21. Defendants published a statement on the email and blog asserting as fact that Plaintiff had permanently lost parental rights.
22. Defendant's statement referred to Plaintiffs by name.
23. Defendants' statements injured Plaintiff's reputations and thereby exposed him to public hatred, contempt or ridicule, or financial injury and impeached his honesty, integrity, virtue, and reputation and exposed Plaintiff to public hatred, ridicule, and financial injury.
24. Defendants' email and website statements were defamatory under the common law. Defendants' statements:
25. Defendants' statement was false because:
- 25.1. It juxtaposed hearsay facts from a doctor's report with the phrase "states" that Zimmerman "inflicted bruises, pulled Marina's hair, pushed her, and 'threatened to kill her,'" all without making it clear that the allegations were hearsay and that the doctor was merely transcribing an allegation and not making a conclusion that Zimmerman made any abuse.
- 25.2. It stated that Zimmerman lost custody. That is not a legal term used in Texas. Zimmerman still is a possessory conservator.
- 25.3. It claimed that Zimmerman injured his daughter and alienated his daughter but no court record found that he injured or alienated his daughter.
- 25.4. No court record found that Zimmerman's "aggression in disciplining his daughter" resulted in "permanent loss of parental rights."
- 25.5. At no point was there any finding that Zimmerman threatened to kill his daughter in the court order or opinion. This is both defamation *per se* and *per quod*.

Exemplary Damages

26. Plaintiff's injury resulted from Defendants' malice, knowledge of the statement's falsity and/or reckless disregard for the truth, which entitled Plaintiffs to exemplary damages under Texas Civil Practices & Remedies Code Section 41.003(a)(2).

Conditions Precedent

27. In accordance with the Texas Civil Practices and Remedies Code Section 73.055, a defamation retraction letter was sent to the opposing party. Any conditions precedent have occurred.

Jury demand

28. A jury demand has been made and Plaintiffs has tendered the jury fee.

Prayer for Relief

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that the Court issue citation for Defendants to appear and answer, and that Plaintiff be awarded a judgment against Defendants for the following:

- 28.1. Actual damages.
- 28.2. Exemplary damages.
- 28.3. Prejudgment and postjudgment interest.
- 28.4. Court costs.
- 28.5. Any other relief to which Plaintiffs are entitled in law or equity.

Respectfully submitted,

CASEY LAW OFFICE, P.C.

/s/ Stephen Casey
Stephen Casey
Texas Bar No. 24065015

600 Round Rock West Drive, Suite 602
Round Rock, Texas 78681
Telephone: 512-257-1324
Fax: 512-853-4098

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiffs' Original Petition was served upon Defendants by the manner and method indicated below on this day, June 11, 2014.

Via private process server

/s/ Stephen Casey
Stephen Casey; Counsel for Plaintiff

Unofficial copy - Travis Co. District Clerk Amalia Rodriguez-Mendoza

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Exhibit 1

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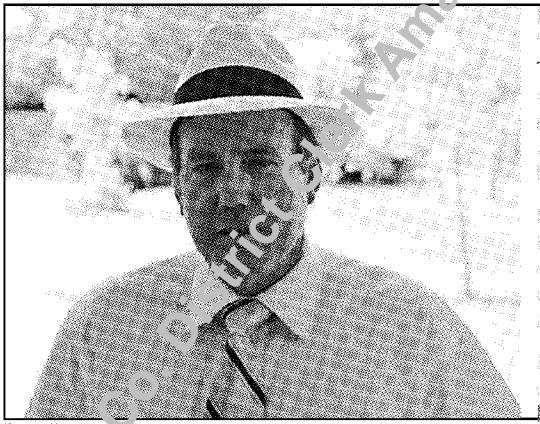
I LIVE HERE,
I GIVE HERE

(9 votes, average 3.67 out of 5)

Candidate Lost Custody Over Abuse

District 8 Council candidate Don Zimmerman injured, alienated daughter, court records state

Investigative Report by Ken Marin
© The Austin Bulldog 2014
Posted Thursday, October 9, 2014 5:10pm



Don Zimmerman

District 8 candidate Donald Shelly "Don" Zimmerman, founder of the Travis County Taxpayers Union, is an aggressive leader who as president of a municipal utility district brought two lawsuits, one of which resulted in winning a case before the U.S. Supreme Court.

His aggression in reobscuring his daughter, Marina Zimmerman, resulted in documented physical and emotional damage and permanent loss of parental rights through civil court action.

File from a Travis County District Court case include three reports from Deborah Meitsch, MD, from early 2011. The reports state that on separate occasions

Zimmerman inflicted bruises, pulled Marina's hair, pushed her, and "threatened to kill her." The reports indicate the doctor would contact Child Protective Services (CPS). Such reporting is required within 48 hours by Texas Family Code Section 261.101, which states, "A professional may not delegate to or rely on another person to make this report."

"I got a call from CPS and consulted a couple of acoumey friends and was told when we are made you should demand proof of the allegations and if Don't get proof you should not cooperate," Zimmerman told The Austin Bulldog in a Tuesday telephone interview.

Three documented incidents

The first incident occurred just three days after Marina's twelfth birthday, then twice more, all within a three-week period in January and February 2011, according to the medical records. She weighed 64 pounds at the time. Each incident occurred during evening or weekend visits when Zimmerman had sole possession as authorized in the divorce decree.

Asked if he did those things to his daughter, Zimmerman replied, "Those are insignificant lies. They are outright fabrications and absolute lies."

Doctor's first examination--January 24, 2011, the physician's record indicates a "very minor bruise" was found on Marina's right forearm. "There are concerns that her father is being physically and emotionally abusive to her when she is visiting him." The record further states, "We will contact the CPS caseworker that is in charge of her case. No serious injury seems to have occurred but I worry about the psychological toll on her."

Doctor's second examination--January 28, 2011, the doctor found that Marina had a bruise on her left shoulder blade and a stiff neck. "He wanted to take her phone away and she walked away and he grabbed her shoulder and spun her around and pushed her backwards...He pushed her from behind and now she has a bruise on her left scapula (shoulder blade). Her neck is stiff after he pushed her..."

Unofficial copy - Travis County Clerk Amalia Rodriguez-Mendoza

"Continued concern of her dad being physically forceful with her," the record states. "[W]ill keep document for CPS case worker."

Doctor's third examination - February 11, 2011, the record notes, "Her dad was harsh with her yesterday and pushed her against the microwave and now she has right hip pain and right shoulder pain. ... Her Dad has been yelling at her and threatened to hit her but didn't. He has threatened to kill her and she has fears of (him) shooting her. Her parents are worried that she needs therapy but her dad refuses."

Zimmerman's threat to hit Marina was overheard by her mother and stepfather in a phone call that she made to her mother during that consultation, according to a sworn affidavit filed by her stepfather, Eric "Ari" Fox.

The February 11, 2011, doctor's record also states, "Concerns of abuse with her and shoulder strain. Recommended if CPS does not intervene this could lead to a life threatening situation. I recommend they pursue (sic) legal full custody as soon as possible. We will contact CPS about the situation."

For prevention the doctor stated, "Counseling: Domestic violence. ... noted this was the most common cause of homicide in Texas and in our area and needs to be taken seriously. [T]he situation seems to be escalating quickly due to CPS investigation."

Zimmerman's response

When questioned in the Tuesday interview about the alleged threat to kill his daughter, Zimmerman replied, "That's an outright lie. None of this has ever been shown to me."

When reminded that the cited medical reports are in his files for his divorce case, Zimmerman replied, "These allegations are new to me. I've never seen them before. These are offensive lies and I've never seen them before. I'm not afraid because these are lies."

Zimmerman said he has a license to carry a concealed handgun and he has guns and ammunition in the house.

"[Bochenkova] demanded I move all my stuff and ammunition out of the house," Zimmerman said. "Why would that demand be made? I can agree to do it or refuse to do it. She's a brilliant manipulator and liar. If I agree to move the guns and ammunition out of the house, then I'm agreeing I'm a violent person who can't be trusted around guns and ammunition, if I do not agree, (to a doctor) and won't acknowledge that I'm a violent and dangerous person. The demand is a lie."

"I'm 54 and never in my life have I been violent against anyone. I've never shown violence. I get angry. I'm angry now why someone lies and attacks my character?"

Zimmerman met Katrina, a "Katya" Bochenkova in Kiev, Ukraine, when he was there teaching English as a second language. She was one of his students. They met again when she was a student at Texas A&M University in College Station. They were married in Brazos County December 5, 1987, when he was 58 and she was 20.

Marina was born in January 1988.

A Final Decree of Divorce was approved May 27, 2005. The marriage was "dissolved on the ground of irresponsibility," which is defined in **Family Code Section 6.001** as "without regard to fault."

Mother followed doctor's advice

The doctor recommended pursuing full legal custody and Bochenkova quickly did so. On February 18, 2011, she petitioned for a Temporary Restraining Order. Included in the petition was a request for the court to order Zimmerman to attend parenting classes and anger-management classes.



Bochenkova told *The Austin Building* she wanted Zimmerman to take those classes and also that he "would modify his behavior that brought us into that conflict situation in the first place."

Asked if he took those classes, Zimmerman replied, "I did not."

In response to Bochenkova's petition, the court issued an Agreed Temporary Injunction to bar Zimmerman from contacting or communicating with his daughter or taking possession of her, rights that had been established by the divorce decree.

Bochenkova

Asked to comment on the injunction, Zimmerman said, "The crux of it is that with people willing to be under oath I'm not going to see my daughter any more. If I persist what would have come next would be false allegations of sexual abuse," Zimmerman said.

"I've seen this bad movie before," he added. "I won't see my daughter anymore. I won't let you play this game."

There has been no communication between Zimmerman and his daughter in more than three years, both he and Bochenkova said.

Current case revived, concluded

On March 10, 2014 Zimmerman's new attorney, David Rockbassett **Stephen Casey** of the Casey

Jew Juice PC, filed a motion to enter a final order in the case, stating that Zimmerman's "relationship with the minor child has become fairly non-existent. ... Respondent remains willing and able to communicate but until it is initiated by the minor child there is no interaction."

Bochenkova told *The Austin Bulldog* that Maria has not seen her father in more than three years and doesn't want to.

The girl's mother responded to Casey's motion by filing petitions of her own in April and June of this year.

In a final agreed order filed June 16, the court ordered that Zimmerman "shall have no possession, control or access to the child."

As part of that order, the court found that Zimmerman owed nearly \$13,000 in arrearage for the child's medical support expenses, and that "Bochenkova has agreed to waive all past medical support."

"We wanted Don out of our life and that was the easiest way to achieve that," Bochenkova told *The Austin Bulldog*. "It was the easiest way to close the deal, and we got the money in exchange for the freedom of our daughter."

The court order in June also removed the requirement for Maria to live in Austin. She recently moved to Bound Brook, New Jersey, with her mother and stepfather.

On the "About Don Zimmerman" page on his campaign website, Zimmerman states, "I have one remarkable daughter, Maria Lorna Zimmerman."

But she got long ago quit using her father's name. In 2001 and 2013 she won medals in fencing competition and performed classical piano in the name of Maria Bochenkova, her mother's maiden name.

"She says she will take my name legally when she is 18," Bochenkova said.

Links:

Final Decree of Divorce In the Matter of the Marriage of Kateryna and Donald Shelly Zimmerman (24 pages, with redactions)

District Court 201st Judicial District, Travis County, Texas, No. D-1-05-000710 (52 pages, with redactions). The doctor's records are on pages 12-16)

Don Zimmerman campaign web site

Travis County Taxpayers Union

Comments

1 2 3 4

#7 Leo 2014-10-14 00:23

to Editor#7

Calling someone a child abuser is stating he is a criminal, which is liable I am sure. The source of information you provided lacks the information that you are confirming this man is a child abuser. (Showing the public the information about Mr. Zimmerman is fair, yet condemning him for child abuse is not.)

EDITOR STATEMENT:

+3 #7 Editor 2014-10-09 20:24

Re: #6: David Berry:

(If you want to ignore a person's character and focus only on what he says then you're missing a crucial element of the qualifications to serve in elective office. And in judging a person's character, I don't think there's anything irrelevant about child abuse.)

Quote

#3 regarding whether a candidate is a public figure, please see <http://aw.justia.com/constitution/us/amendmen-01/46-defamation.html>, which I quote in part:

"Moreover, candidates for public office were subject to the Times rule [this refers to New York Times Co. v. Sullivan] and comment on their character or past conduct, public or private, insofar as it touches upon their fitness for office, is protected."

"Candidates for public office, the Court has said, place their whole lives before the public, and it is difficult to see what criticisms could not be related to their fitness."

"In *Monitor Patriot Co. v. Roy*, 401 U.S. 265, 274-75 (1971), the Court said: "The principal activity of a candidate in our political system, his 'office,' so to speak, consists in putting before the voters every conceivable aspect of his public and private life that he thinks may lead the electorate to gain a good impression of him. . . . And the candidate who vaunts his spotless record and sterling integrity cannot convincingly cry 'Foul' when an opponent or an industrious reporter attempts to demonstrate the contrary"

Quote

Quote

1 2 3 4

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Name (required)
 E-mail (required, but will not display)

2500 characters left

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Unofficial copy - Travis Co. District Clerk Amalia Rodriguez-Mendoza

From: Don Zimmerman
Subject: FW: Fwd: Candidate lost custody over abuse
Date: October 9, 2014 at 5:33 PM
To:

Sent from my Android phone using TouchDown (www.nitrodesk.com)

Begin forwarded message:

From: "Ken Martin: The Austin Bulldog" <ken@theaustinbox.org>
Date: October 9, 2014, 4:42:09 PM CDT
To:
Subject: Candidate lost custody over abuse
Reply-To: ken@theaustinbox.org



Bulletproof Investigative Reporting

The Austin Bulldog News Alert

Due diligence reporting needed to inform voters

Don Zimmerman, District 6 candidate for city council, in response to our investigation of the abuse of his daughter, claims he has not seen the records of doctor examinations upon which the child abuse is based. But these records are readily available in the Travis County District Clerk's office as part of his divorce case. That's where we purchased them.

The divorce case that began in 2005 heated up in early 2011 with three

Candidate Lost Custody Over Abuse

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But aggression in disciplining his daughter, Marina Zimmerman, resulted in documented physical and emotional damage and permanent loss of parental rights through civil court action.

Files from a Travis County District Court case include three reports from Deborah Neitsch, MD, from early 2011. The reports

incidents, and resulted in an Agreed Temporary Injunction that barred him from contacting, communicating with, or taking possession of the girl. The case was concluded just four months ago and resulted in making permanent Zimmerman's loss of rights.

The Austin Bulldog operates as a 501(c)(3) nonprofit, so your donation is tax-deductible. [Donate now.](#)

Thank you! -- Ken Martin

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state that on separate occasions Zimmerman inflicted bruises, pulled Marina's hair, pushed her, and "threatened to kill her." The doctor contacted Child Protective Services as required by state law.

"I got a call from CPS and consulted a couple of attorney friends and was told when lies are made you should demand proof of the allegations and if don't get proof you should not cooperate," Zimmerman told *The Austin Bulldog* in a Tuesday telephone interview.

When questioned about the alleged threat to kill his daughter, Zimmerman said, "That's an outright lie. None of this has ever been shown to me," despite the fact these records are part of the files for his divorce records.

To read the story and access a 24-page file about Zimmerman's divorce and a 52-page PDF containing court and doctor's records, [click here.](#)

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If you've got ideas, suggestions, feedback, constructive criticism, story ideas, or just want to tell us what you think, please e-mail me at ken@theaustribulldog.org or call me at 512-474-1022.

--Ken Martin, editor

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CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY): _____ COURT (FOR CLERK USE ONLY): _____

STYLED Don Zimmerman v. Austin Investigative Reporting Project, et al.
 (e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing. This sheet, approved by the Texas Judicial Council, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

1. Contact information for person completing case information sheet:		Names of parties in case:	Person or entity completing sheet is:
Name: <u>Stephen Casey</u>	Email: <u>info.caseylawoffice@gmail.com</u>	Plaintiff(s)/Petitioner(s): <u>Don Zimmerman</u>	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____
Address: <u>595 Round Rock West Dr. Ste 102 City/State/Zip: Round Rock, TX 78681</u>	Telephone: <u>(512) 257-1324</u> Fax: <u>(512) 853-4098</u>	Defendant(s)/Respondent(s): <u>Austin Investigative Reporting Project, d/b/a/ The Austin Bulldog; Ken Martin</u>	Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____
Signature: _____	State Bar No: <u>24065015</u>	[Attach additional page as necessary to list all parties]	

2. Indicate case type, or identify the most important issue in the case (select only 1):					
Civil			Family Law		
Contract Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Defamation <i>Malpractice</i> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: _____ <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <i>Product Liability</i> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability: List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	Real Property <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <i>Divorce</i> <input checked="" type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____	Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____				
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	Probate & Mental Health <i>Probate/Wills/Intestate Administration</i> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____				

3. Indicate procedure or remedy, if applicable (may select more than 1):		
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover