

**IN THE DISTRICT COURT OF OKMULGEE COUNTY
STATE OF OKLAHOMA**

IN RE THE DISSOLUTION OF)
THE MARRIAGE OF:)
SANDRA JEAN KENNEDY,)
)
 Petitioner,)
)
and)
)
JOSEPH LLOYD KENNEDY, II,)
)
 Respondent.)

FD-2022-146
Case No. FD-2022-
Judge

FILED
IN DISTRICT COURT
OCT 19 2022
OKMULGEE COUNTY, OKLAHOMA
CHARLY CRINER, Court Clerk
By _____ Deputy

PETITION FOR DISSOLUTION OF MARRIAGE

COMES NOW the Petitioner, Sandra Jean Kennedy, and for her Petition for Dissolution of Marriage against the Respondent, Joseph Lloyd Kennedy, II, alleges and states as follows:

1. Residency. Petitioner is now and has been for more than six (6) months next preceding the filing of the Petition herein an actual resident, in good faith, of the State of Oklahoma, and a good faith residents of Okmulgee County, for thirty (30) days next preceding the filing of this Petition. The parties have not separated as yet County.
2. Date of Marriage. The parties were married on July 1980 in Okmulgee, State of Oklahoma, and have been since that time and are at the present time husband and wife.
3. Children. Of this marriage, no children were born; and Petitioner is not now pregnant.
4. Grounds. As grounds for dissolution of the marriage, Petitioner alleges that a state of complete and irreconcilable incompatibility has arisen between the parties which has completely destroyed the legitimate aims of the marriage of the parties and rendered its continuation impossible, by reason of which Respondent and Petitioner are entitled to a Decree of Dissolution of Marriage, each from each other.

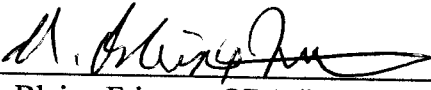
5. Marital Property. During the marriage, the parties have acquired certain property, which the Petitioner requests be divided equitably between the parties.
6. Debts. During the marriage, the parties have acquired certain debts which the Petitioner requests the Respondent pay
7. Support Alimony: Petitioner is entitled to support alimony under Oklahoma case and statutory authority.
8. Property Alimony: Petitioner is entitled to property alimony.
9. Temporary Spousal Support: Petitioner is entitled to temporary spousal support under Oklahoma Statutory authority and case law.
10. Temporary Attorney's Fees: Petitioner has been a housewife for 34 years, and is entitled to a temporary award for attorneys fees
11. Temporary Order. By separate application, the Petitioner seeks a Temporary Order granting her temporary relief in addition to the provisions of the Automatic Temporary Injunction.
12. Real Property. The parties have purchased several parcels of real property in Okmulgee and McIntosh Counties during the pendency of the marriage, and all right, title and interest in said real property should be granted to the Petitioner, subject to the indebtedness thereon.

WHEREFORE, PREMISES CONSIDERED, the Petitioner prays that upon hearing this cause the Court grant and award to the Petitioner the following:

- 1) a Decree of Dissolution of Marriage from the Respondent;
- 2) a fair and equitable division and distribution of the property accumulated by the parties;
- 3) a fair and equitable division of the debts accumulated by the parties;
- 4) an award of alimony, both property and support; and
- 5) a Temporary Order.

- 6) Temporary attorney's fees.
- 7) and such other and further relief to which Petitioner may be entitled, including but not limited to the payment of all of Petitioner's attorney's fees and court costs incurred by Petitioner, and any and all other relief the court deems just and equitable.

Respectfully submitted,

By: 
N. Blaine Frierson OBA # 13979
1126 South Frankfort Avenue
Suite 100
Tulsa, Oklahoma 74120-4209
(918) 382-5300 phone
blainefrierson@gmail.com

VERIFICATION

STATE OF OKLAHOMA)
)
)
COUNTY OF TULSA)

I state under penalty of perjury under the laws of Oklahoma that the foregoing *Petition for Dissolution* is true and correct to the best of my knowledge and belief.


Sandra Jean Kennedy, Petitioner

Dated at Tulsa, Oklahoma this 19th day of October, 2022.