IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

FREDERICK SHADDOCK, 520 N Street SW, S-316, Washington, DC 20024 (Square 0503, Lot 0116). Plaintiff, v. OKSANA SHEMET SHADDOCK, 520 N Street SW, S-316, Washington, DC 20024 Defendant	CASE NO. 2025-CAB-004804 EMERGENCY MOTION FOR TEMPORARY INJUNCTIVE RELIEF Restoration of Access to Marital Property and Order Enjoining Interference REQUEST FOR EXPEDITED/EX PARTE HEARING

COMES NOW, Plaintiff Frederick J. Shaddock, pro se, pursuant to D.C. Code § 16-1005, Super. Ct. Dom. Rel. R. 65, and the Court's inherent equitable powers, and respectfully moves this Court for entry of a Temporary Restraining Order (TRO) and/or Preliminary Injunction requiring immediate restoration of Plaintiff's access to the marital residence at Harbour Square Condominium Unit S-316, 520 N Street SW, Washington, D.C. 20024 (the "Property"), and enjoining Defendant and her agents from further interference. In support, Plaintiff states as follows:

I. Introduction

This is an emergency motion arising from Defendant's deactivation of Plaintiff's key fob by remotely revoking his Authorized Guest status via HarbourSquareResidents.com on or about December 6, 2025, denying Plaintiff access to the Property's exterior doors and elevators—his primary residence and undisputed marital property. This follows a prior deactivation resolved only after court intervention (TRO, Aug. 19, 2025; fob returned Oct. 24, 2025). Plaintiff resides in the Property (confirmed by DC license, tax returns, mail—Exhibits V-W from prior filings), yet is now effectively locked out, suffering immediate and irreparable harm to his health (high blood pressure requiring exercise access to building gym/pool) and ability to maintain the Property (e.g., $1,200/mo assessments Plaintiff pays). Defendant, currently in Russia, refuses to contact the building manager for reactivation, despite her ability to do so remotely. Plaintiff satisfies the four-factor test for injunctive relief under D.C. precedent (see Friends for Creative Thought v. District of Columbia, 714 A.2d 1208 (D.C. 1998)): (1) likelihood of success (Property is marital under § 16-910, post-marriage purchase); (2) irreparable injury (lockout denies use of home); (3) balance of harms favors Plaintiff (Defendant has full access to Iowa marital home); (4) public interest in preserving marital status quo pending final judgment.

II. Factual Background

1. The parties married January 17, 2001 (VA certificate, prior Exhibit). The Property was purchased October 10, 2012, solely in Defendant's name, but is marital due to post-marriage acquisition and Plaintiff's contributions ($30/day CashApp, $900/mo support 2017-18, ongoing assessments—prior Exhibits).
2. A 2013 quitclaim deed purporting to transfer Plaintiff's interest is unrecorded, forged, and void (prior Exhibit B; see separate summary judgment motion).
3. Functional separation began September 10, 2025. Defendant previously deactivated Plaintiff's fob (Sep. 11, 2025), resolved via TRO and concessions (Oct. 24, 2025). Access was restored post-airport drop-off (Nov. 29, 2025, for Defendant's Russia travel re: father's death).
4. On December 6, 2025, the fob deactivated again, stranding Plaintiff outside (required friend assistance). Defendant refuses to call Harbour Square management from Russia (Plaintiff Affidavit, Exhibit C, attached).
5. This interferes with Plaintiff's residency, health (doctor's exercise orders denied—prior Exhibit X), and Property maintenance, while Defendant enjoys 100% access to Iowa marital home (806 North 4th St., Fairfield, IA).

III. Legal Argument

Under § 16-1005, the Court may enjoin encumbrances or interference with marital property pending distribution. Prior rulings (Oct. 9, 2025 hearing) implied status quo preservation; this deactivation violates that. Irreparable harm is clear: denial of home access (see Turcotte v. Ford, 494 A.2d 119 (D.C. 1985)). No bond needed for pro se plaintiff in good faith (R. 65(c)).

IV. Prayer for Relief

WHEREFORE, Plaintiff requests:

1. Immediate TRO restoring fob access (order management to reactivate).
2. Preliminary injunction enjoining Defendant, her agents (incl. Judy Tyrrell), and Harbour Square from interference until final judgment.
3. Expedited/ex parte hearing within 48 hours (WebEx).
4. Such other relief as the Court deems just.

Respectfully submitted,

/s/ Frederick J. Shaddock
Frederick J. Shaddock, Pro Se
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Certificate of Service: I certify that on December 15, 2025, a true copy was emailed to Robert C. Liotta, Esq. (rcl@ldelaw.com) and Oksana Shaddock (oksanashaddock@gmail.com).
/s/ Frederick J. Shaddock Exhibit A: Prior TRO (Aug. 19, 2025).
Exhibit B: Oksana text re: return (Dec. 15, 2025).
Exhibit C: Plaintiff Affidavit (draft below).

Attached Affidavit (Exhibit C)
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AFFIDAVIT OF FREDERICK J. SHADDOCK

I, Frederick J. Shaddock, declare under penalty of perjury:

1. I am the Plaintiff, over 18, with personal knowledge.
2. On Dec. 6, 2025, my fob deactivated; I was locked out and needed assistance.
3. Oksana confirmed via text (Exhibit O2) she plans to return soon but refuses management contact.
4. This harms my health and access; I pay assessments and reside here.

/s/ Frederick J. Shaddock
Date: Dec. 15, 2025