IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

FREDERICK SHADDOCK, 520 N Street SW, S-316, Washington, DC 20024 Lot 0116 Square 0503 Plaintiff, v. OKSANA SHEMET SHADDOCK, 520 N Street SW, S-316, Washington, DC 20024 Defendant.	CASE NO. 2025-CAB-004804 **EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER PRELIMINARY INJUNCTION** (Restoration of Key Fob Access to Marital Condo)

COMES NOW, Plaintiff Frederick J. Shaddock, pro se, pursuant to D.C. Code § 16-1005, § 16-910, Super. Ct. Dom. Rel. R. 65, and the Court's equitable authority, and moves for an emergency temporary restraining order (TRO) and/or preliminary injunction requiring immediate restoration of Plaintiff's key fob access to Harbour Square Condominium Unit S-316 pending the March 6, 2026 hearing or further order. Plaintiff requests an expedited or ex parte hearing due to ongoing irreparable harm.

I. Introduction & Irreparable Harm

Defendant has deactivated Plaintiff's key fob since September 10, 2025 (with brief restoration October 2025), denying independent access to the marital condominium (Unit S-316). This confinement prevents Plaintiff from:

- Leaving and re-entering the unit independently.
- Accessing the building gym/pool as ordered by his doctor for health maintenance (high blood pressure, sun light, fresh air, daily exercise requirement).
- This constitutes physical/mental harm and interference with marital property use.

Plaintiff satisfies the four-factor test for injunctive relief:
(likelihood of success, irreparable injury, balance of harms, public interest).

II. Factual Background

1. Parties married January 17, 2001; condo purchased October 10, 2012 (marital property).
2. Fob deactivated September 10, 2025; brief restoration October 24, 2025; reactivated post-airport drop-off November 29, 2025; deactivated again December 6, 2025 via remote portal.
3. Plaintiff resides in the unit; doctor's order requires gym/exercise access (Exhibit A).
4. Confinement causes physical harm (no independent exit & re-entry, denied exercise).
5. Ongoing mail obstruction to S-316 box exacerbates harm.

III. Legal Argument

- Likelihood of success: Condo is marital (§ 16-910); prior TRO shows interference.
- Irreparable injury: Health harm from denied gym access; confinement is abusive.
- Balance of harms: Defendant suffers none from reactivation; Plaintiff suffers daily.
- Inability to open condo garage door with fob to paid-for $155/month spot also deteriorates marital Mercedes Benz which Plaintiff has to park on the street in rain
- Public interest: Preserving access to marital residence pending distribution.

No bond requested (pro se, good faith).

IV. Prayer for Relief

1. Immediate TRO restoring key fob access (exterior doors, elevators, gym/pool).
2. Preliminary injunction enjoining further deactivation/interference.
3. Expedited/ex parte hearing (WebEx).
4. Other relief as just.

Respectfully submitted,

/s/ Frederick J. Shaddock
Frederick J. Shaddock

List of Exhibits:

Exhibit AH - Affidavit of Frederick Shaddock about health impact of fob deactivation by Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of October 18, 2025, a copy of the foregoing Plaintiff's Emergency Motion for Reconsideration and Clarification was served via email upon Robert Case Liotta, Esq. at rcl@ldelaw.com.

Defendant, Oksana Shaddock at OksanaShaddock@Gmail.com

Robert C. Liotta, Esq. (rcl@ldelaw.com)

/s/ Frederick J. Shaddock
Frederick J. Shaddock