Superior Court of the District of Columbia
Domestic Violence Division
500 Indiana Ave NW, Room 4510, Washington DC 20001
202-879-0157 | www.dccourts.gov

FREDRICK SHADDOCK Petitioner ☐ Minor Case No: **2026 CPO 000871**

vs.

OKSANA SHEMET SHADDOCK Respondent ☐ Minor

TEMPORARY PROTECTION ORDER

Upon consideration of the petition filed in this case, the Court finds that the safety or welfare of Petitioner and/or an animal the Petitioner owns, possesses, or controls is endangered by Respondent within the meaning of D.C. Code §16-1004(d) (2021). Therefore, **IT IS HEREBY ORDERED** that Respondent shall observe the following conditions:

☒ Respondent shall not commit or threaten to commit crimes against Petitioner, their child(ren), or their animal(s). Respondent shall not assault, harass, stalk, or threaten - including the use, attempted use, or threatened used of physical force that would reasonably be expected to cause bodily injury to any person or animal named in this order.

☐ Respondent shall stay at least 100 yards away from Petitioner's ☐ person ☐ home ☐ workplace ☐ vehicle ☐ children's school/day care ☐ animal *(name and type)* _____ ☐ other: _____

☐ Respondent shall not contact Petitioner in any manner, including but not limited to: ☐ by telephone ☐ in writing ☐ electronic or social media ☐ any other manner, either directly or through a third party

☐ Temporary custody of the following minor children is awarded to: ☐ Petitioner ☐ Respondent until further order of this Court or the expiration of this order *(List the Names and Dates of Birth of the Minors)*:

_____

☐ Respondent shall vacate the residence at *(address)*: _____ on or before *(date)* _____ and turn over all keys to the residence to Petitioner.

☐ The Police Authorities shall stand by to:
☐ prevent violence while the Respondent / Petitioner vacates the residence;
☐ retrieve Petitioner's keys from Respondent;
☐ assist with service of process upon the Respondent and complete the Return of Service forms.

☐ Respondent shall refrain from possessing, controlling, harming, threatening to harm, or otherwise dispose of Petitioner's animal.

☐ Other: _____

Participation in mediation and attendance at court hearings are not a violation of this court order.

Firearm and Ammunition Restrictions

The respondent is required to relinquish possession of any firearms or ammunition while this order is in effect.

The respondent is prohibited from possessing, controlling, purchasing, or receiving any firearms or ammunition while this order is in effect. **Failure to comply with this order is a criminal offense.**

- For adults: The penalty includes up to 180 days in jail and/or a fine of up to $1,000.
- For minors: The penalty includes commitment to the Department of Youth Rehabilitation Services until the age of 21.

IF A RESPONDENT SERVED WITH THIS ORDER FAILS TO APPEAR AT THE HEARING ON THE CIVIL PROTECTION ORDER AND A DEFAULT CIVIL PROTECTION ORDER IS ENTERED, THIS ORDER SHALL REMAIN IN FULL FORCE AND EFFECT UNTIL THE CIVIL PROTECTION ORDER IS SERVED.

If the court is closed on the day that this order expires, this order shall continue in effect until the next regular court business day.

This order expires on:

4/10/2026	Darcy M Jones	3/27/2026
EXPIRATION DATE	Judge	Date

THIS ORDER HAS BEEN **EXTENDED** UNTIL:

EXPIRATION DATE	Judge	Date

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
DOMESTIC VIOLENCE DIVISION (202) 879-0157

Frederick J. Shaddock , **Petitioner**
Your Name (If on behalf of minor child, write "[Your Name] OBO [Child's Name]")

Your Address (If confidential, request a Confidential Address Form) 520 N Street SW, S-316, Washington DC 20024 ☐ Substitute Address

CPO No: 2026 CPO 000871

vs.

Oksana S. Shaddock , **Respondent**
Name of Individual Against Whom You Are Filing

520 N Street SW, S-316, Washington DC 20024
Individual's Address

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA DOMESTIC VIOLENCE
2026 MAR 27 AM 10:29
FILED

PETITION AND AFFIDAVIT FOR CIVIL PROTECTION ORDER

Pursuant to D.C. Code Section 16-1001 et seq.; Petitioner respectfully requests that the court issue a Civil Protection Order against Respondent. In support of this request, Petitioner states:

1. Petitioner is related to Respondent by:
☐ Blood; ☐ Adoption; ☐ Legal Custody; ☒ Marriage; ☐ Having a Child in Common; ☐ Being the Child of an Intimate Partner ☐ Domestic Partnership; ☐ Sharing residence within this past year and maintaining close relationship; ☐ Sex trafficking of children; ☐ Sexual Assault; ☐ Trafficking in labor or commercial sex acts; ☐ Is, was, or is seeking to be in a Romantic/Dating/Sexual Relationship; ☐ Other (explain) _____
2. Do you reside, live, work or attend school in the District of Columbia? ☒ Yes ☐ No
3. Did any incident described below occur in the District of Columbia? ☒ Yes ☐ No
4. Respondent committed or threatened to commit an act punishable as a criminal offense against Petitioner within the meaning of D.C. Code Section 16-1001 et seq., by: *(Please describe any such acts, including physical assaults like hitting, punching, shoving or kicking; threats to do harm, or destruction of property).*

A. On or about September 10 20 25 at approximately 5:00 a.m./(p.m.),
At (location): Harbour Square S-316 W,DC and ongoing
Respondent: Respondent deactivated my elevator key fob, denying me independent access to the marital condo, gym, pool, and common areas. This unlawful lockout for 6 months of normal access prevented my doctor's order for exercise

B. On or about March 5, 2026 20 26 at approximately 11:30 (a.m.)/p.m.,
At (location): Attorney Office 3726 Harrison St NW WDC
Respondent: through Attorney threatened to evict me from the marital home without a hearing, reason, or Court order upon Respondents return from Russia on March 30 after picking her up from Dulles Airport

C. On or about March 16, 2026 20 26 at approximately 5:27 (a.m.)/p.m.,
At (location):
Respondent: Respondent demanded removal of wall of Book Shelves and Boxes which create 2 rooms from the big living room and keep marital Peace

D. On or about June 30 2000 at approximately 12:00 a.m./(p.m.),
At (location):
Respondent: Respondent has extorted to call the Police for no reason over 34 documented times. See 911FakeCalls.com

See Attached continuation of Section 4

Superior Court of the District of Columbia
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202-879-0157 | https://www.dccourts.gov

FREDRICK SHADDOCK
Petitioner
v.
OKSANA SHEMET SHADDOCK
Respondent

Case Number: 2026 CPO 000871

NOTICE OF REMOTE HEARING AND ORDER TO APPEAR REMOTELY/VIRTUALLY

THIS HEARING HAS BEEN SET REMOTELY. FOR MORE INFORMATION ABOUT YOUR HEARING DATE OR OPTIONS, CALL THE CLERK'S OFFICE AT 202-879-0157

You are ordered to join the virtual hearing on **April 10, 2026**. **You must report for check-in at 8:30 a.m.** The hearing will take place via Webex. You are required to turn your video on and be on camera during the check-in process and hearing. If you are unable to turn your video on, you will not be able to proceed with your virtual hearing and will need to report to court in person. **The hearing may take place any time on this day after check in**. Instructions to join the hearing are below.

- To join the hearing by video, please click on this link: https://dccourts.webex.com/meet/ctb113 or by visiting dccourts.webex.com and typing the meeting ID **129 399 5296.**
- In the event that you are unexpectedly unable to join the WebEx by video, please call (202) 860-2110 and type in the meeting code which is **129 399 5296** to check in for your hearing by phone. You will receive instructions about your hearing.
- For technical questions about joining the hearing, contact the Courtroom Recording and Technology Branch at 202-879-1928, and select option 2.

At the hearing, the Court will consider:

- ☒ A Petition and Affidavit for a Civil Protection Order that has been filed against you. A copy is attached
- ☐ A Motion to Modify/Extend a Civil Protection Order that has been filed against you. A copy is attached.
- ☐ A Petition and Affidavit for an Anti-Stalking Order that has been filed against you. A copy is attached
- ☐ A Motion to Modify/Extend an Anti-Stalking Order that has been filed against you. A copy is attached.
- ☐ _____

You should carefully review the document that has been filed against you so that you can be fully prepared for the court hearing.

IF YOU HAVE ANY EVIDENCE, you want the Court to consider at the hearing, please save these items electronically. Evidence can include text messages, emails, photographs, list of witnesses or other documents. You will receive instructions on how to submit your evidence on the day of trial.

IF YOU HAVE ANY WITNESSES, they need to be available for the trial by video. You can provide the Court your witnesses' name(s) and contact information on your hearing day.

If the attached Petition or Motion contains a request for 1) child support 2) spousal support 3) property damage reimbursement or other financial reimbursement or 4) attorney's fees, you MUST be prepared to submit:

1. Two recent pay stubs or wage statements from your present or most recent employer; AND
2. Income tax returns for the past two years.

Affidavit for Civil Protection Order

Petitioner: Frederick Shaddock
520 N Street SW, S-316, Washington, DC 20024

Respondent: Oksana Shemet Shaddock
520 N Street SW, S-316, Washington, DC 20024

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1. Petitioner is related to Respondent by:
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2. Do you reside, live, work or attend school in the District of Columbia? [X] Yes [ ] No

3. Did any incident described below occur in the District of Columbia? [X] Yes [ ] No

4. Respondent committed or threatened to commit an act punishable as a criminal offense against Petitioner within the meaning of D.C. Code Section 16-1001 et seg., by: *(Please describe any such acts, including physical assaults like hitting,*
punching, shoving or kicking; threats to do harm, or destruction 0f property).

Since September 10, 2025, Respondent has deactivated my key fob to our marital condominium at Harbour Square, Unit S-316, denying me independent access to the building, elevators, gym, and pool for over six months. This lockout has prevented me from following my doctor's order for regular exercise to manage high blood pressure. As a result, I have suffered ongoing physical harm including shaking hands, limping, and frequent headaches. Respondent has also interfered with my U.S. mail delivery to the unit and, through her counsel, threatened to evict me and have me arrested for trespassing upon her return around March 30, 2026. She has made repeated false 911 calls, including one in Fairfield, Iowa, falsely claiming assault. http://911FakeCalls.com and http://911HomeJack.com

To minimize conflict and maintain peace in the shared living space, I have divided the living room into two separate rooms using a wall of bookshelves and boxes. One half serves as Respondent's working area, and the other half serves as my bedroom and work area. Respondent retains the regular bedroom, with shared kitchen and bathroom. I request that this room division wall remain in place until a full hearing to help keep the peace and reduce conflict. I have no objection to Respondent returning to the D.C. area, but I fear that she will attempt to force me out of our marital home, remove the bookshelf wall, change the locks, interfere with my access, or call the police or building management to have me removed.

These actions have caused me serious emotional distress, twitching, stroke symptoms, head aches, and continue to interfere with my use of the marital property. I respectfully request an ex parte temporary Civil Protection Order with no-contact and stay-away provisions to protect me pending a full hearing.

Petitioner further requests any other relief that is appropriate to the effective resolution of this matter, pursuant to D.C. Code §16-1005(c)(11). Petitioner requests that a hearing be set on this matter and that a Notice of Hearing and Order to Appear be issued to Respondent.

Respondent's address: ☒ Residence ☐ Business 520 N Street SW S316, Washington DC 20024

DISTRICT OF COLUMBIA, I, Frederick J. Shaddock, swear under the penalty of perjury, that I am the Petitioner, or a person authorized to file on behalf of the Petitioner, named in this case; I have read and understand the Petition and Affidavit; and that the facts stated are true to the best of my knowledge.

Date: March 25, 2026

Petitioner

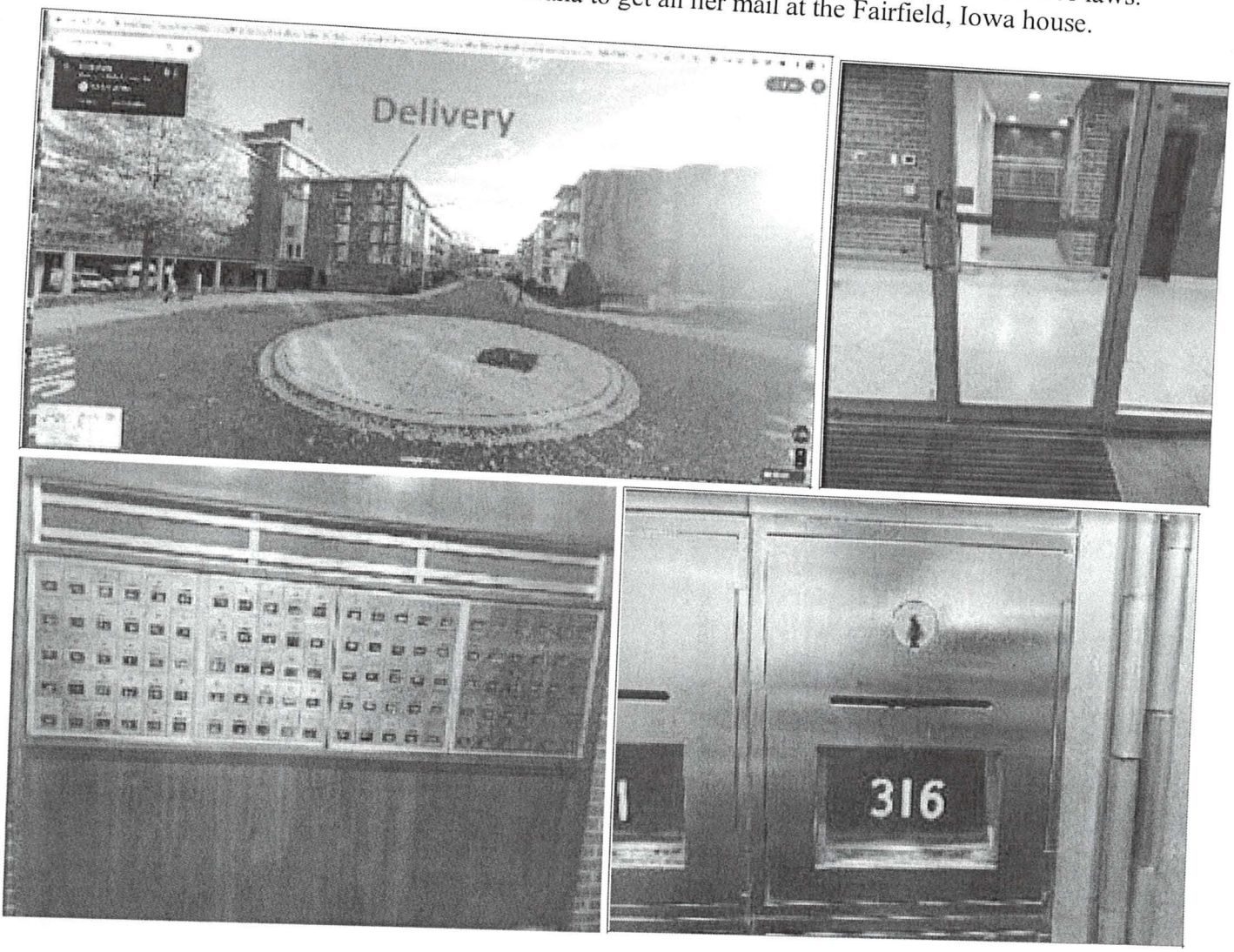
☐ I am filing on behalf of a minor and am related to them by: blood, adoption, legal custody, marriage, or domestic partnership.

Person authorized to file on behalf of Petitioner

Filer's relationship to Petitioner

Exhibit M: Mail Malfeasance, Monopolization, and Misappropriation

Oksana Shaddock has not let Frederick Shaddock get his mail for Harbour Square unit S-316.
He asks for a key or at least non-interference with his rights by the U.S. Postal Service laws.
Meanwhile Frederick allows Oksana to get all her mail at the Fairfield, Iowa house.



Frederick Shaddock is down to his last Pentagon Federal Credit Union check #400 and needs to order more checks, and no longer has the Arlington Virginia P.O. Box, **but Oksana will not let him use the Box 316 in Harbour Square south building.**

2 False Accusations of "Trespassing" by Wife

33 10-27-2025

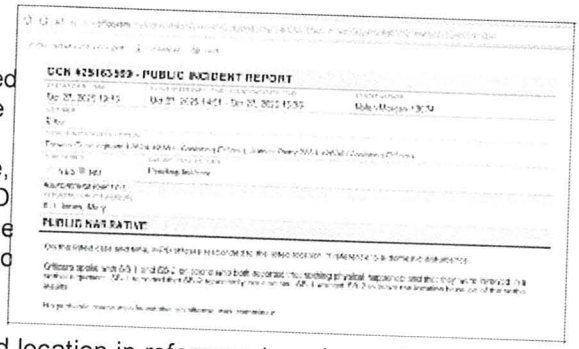
4 days before the Marital Property Hearing before Judge Carl Ross on October 31. Oksana called her friend Mary Jones in Fairfield Iowa who called 911 from 1000 miles away for a non-emergency complaint against husband Frederick. 3 DC Metropolitan Police responded to the marital apartment DC Metropolitan Police Report: **CCN #25163569**



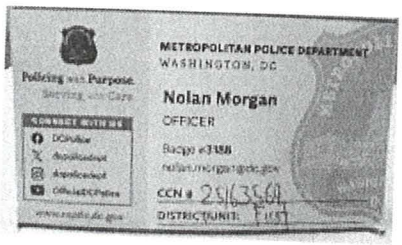




On the listed date and time, MPD office respo to the



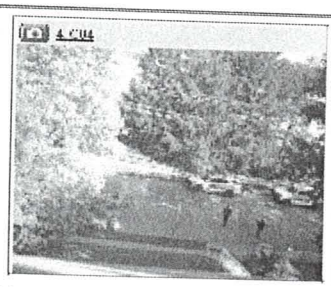
listed location in reference to a domestic disturbance.
Officers spoke with SB-1 and SB-2 on scene who both reported that nothing physical happened and that they were involved in a
verbal argument. SB-1 reported that SB-2 repeatedly insulted her. SB-1 wanted SB-2 to leave the location because of the verbal insults.
No probable cause was found that an offense was committed.

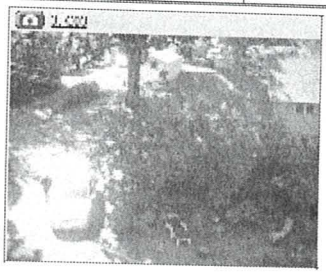


28 9-28-2025 4:00 pm



Oksana the 911 Nut calls the Police to her marital home to report a tenant who she does not like - a Black lady Joni.

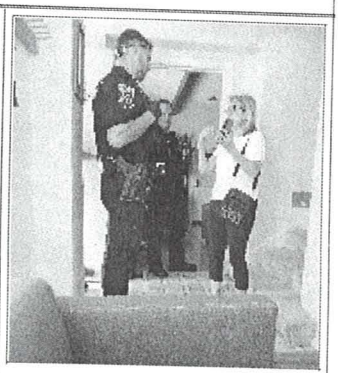




She also accuses them of being "druggies" when Oksana takes all kinds of pills.
Fairfield Police Department report number: PD 2506260.
Another waste of Law Enforcement resources.
Husband Frederick Shaddock was at their marital condo in Washington DC 1000 miles away to avoid her nagging and potential false accusations.



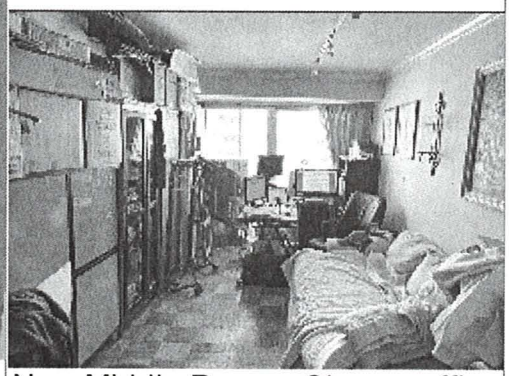




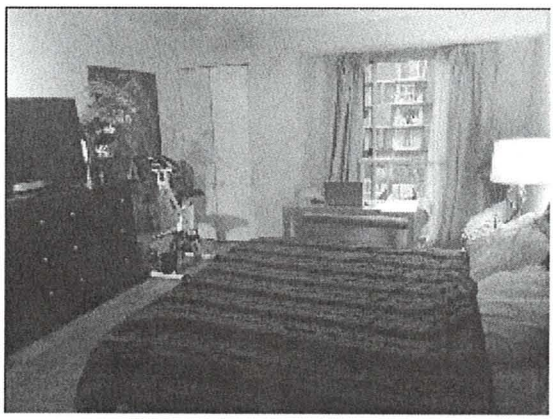
Peace Protecting Wall



New West room - Frederick
bed room and office



New Middle Room - Oksana office

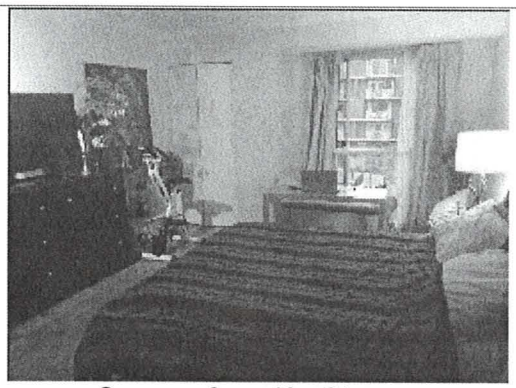


East Room - Oksana

Before



Original Living Room



Same - for wife Oksana

Defendant's actions has caused Plaintiff to miss 4 medical appointments and 2 dental appointments

In addition she has interfered with my medical appointments are in Iowa, near 2nd marital home, but if Frederick leaves the marital DC condo without a working fob or Authorized Occupant status, he would have difficulty getting back in, especially if Oksana changes the locks.

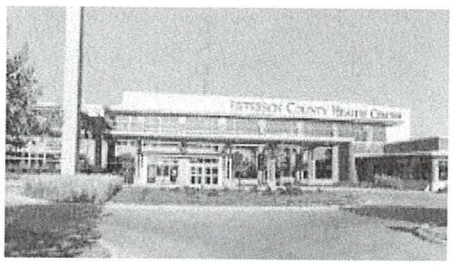
* January 12, 2026

* December 15, 2025

* November 21, 2025

* October 20, 2025





Source: http://UHC.com House Calls Department 8

Dental

November 24 at 4:00

September 15

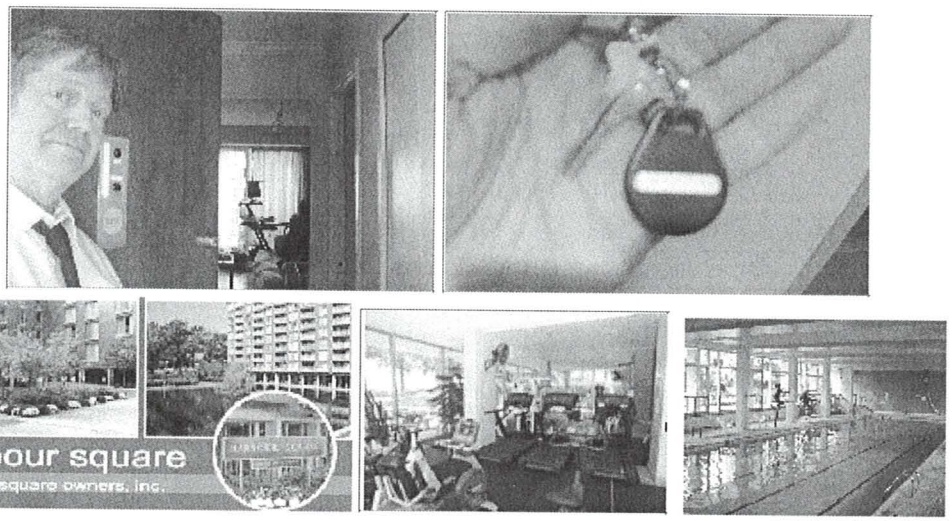




Source: River Hills Family Dental Center team

I cannot go to shop for organic healthy food and am stuck eating Door Dash delivery food, such as McDonald's.

Fob - the Key to Health



S2032B modified

CERTIFICATE OF VITAL RECORD

VERIFY PRESENCE OF WATERMARK — HOLD TO LIGHT TO VIEW

11390461

COMMONWEALTH OF VIRGINIA

DEPARTMENT OF HEALTH – OFFICE OF VITAL RECORDS

COPY B
for Division Of Vital Records

COMMONWEALTH OF VIRGINIA
MARRIAGE REGISTER

Circuit Court For the City Or County Of: Arlington

01-001131

Clerk's Number: 51

GROOM

1. Full Name: (first, middle, last) Of Groom: FREDERICK JAMES SHADDOCK
1a. Social Security #: 057-40-8343
2. Age: 45 Years
3. Date Of Birth (month, day, year): 10/07/1955
4. Place Of Birth (state or foreign country): ROCHESTER, NY
5. Race: WHITE
6. Number Of This Marriage: FIRST
7. Marital Status (if previously married): ☐ Widowed ☐ Divorced
8. Education (elementary or Secondary) (Specify only highest grade completed) (0-12): (12)
College (1-4 or 5+): (5+)
9a. Usual Residence: Street Address or Rt. Number: 1000 UNIVERSITY MANOR DR. #28A
9b. City Or Town Of Residence: FAIRFIELD
9c. County (if not independent city): JEFFERSON
9d. State (or foreign country): IOWA
10. Name Of Father: WARREN M. SHADDOCK
11. Full Maiden Name Of Mother: GLORIS MULFERD

BRIDE

12. Present Name (first, middle, last) Of Bride: OKSANA ROSTISLAVOVNA SHEMET
Maiden Surname (if different):
12a. Social Security #: 481-27-8373
13. Age: 31 Years
14. Date Of Birth (month, day, year): 02/13/1969
15. Place Of Birth (state or foreign country): ST. PETERSBURG, RUSSIAN
16. Race: WHITE
17. Number Of This Marriage: FIRST
18. Marital Status (if previously married): ☐ Widowed ☐ Divorced
19. Education (elementary or Secondary) (Specify only highest grade completed) (0-12): (12)
College (1-4 or 5+): (5+)
20a. Usual Residence: Street Address or Rt. Number: 1000 N. 4TH POD 125 C #6
20b. City Or Town Of Residence: FAIRFIELD
20c. County (if not independent city): JEFFERSON
20d. State (or foreign country): IOWA
21. Name Of Father: ROSTISLAV A. SHEMET
22. Full Maiden Name Of Mother: OLGA V. GAUN

MARRIAGE LICENSE

23. TO ANY PERSON LICENSED TO PERFORM MARRIAGES: You are hereby authorized to join the above-named persons in marriage under procedure outlined in the statutes of the Commonwealth Of Virginia

Signature > Linda R. Duncan (Clerk Of Court Or Deputy)

Date Issued: 01/05/2001
License expires sixty days after above date
Date received by Clerk Of Court from Officiant: 01/18/2001

MARRIAGE CERTIFICATE

24. Date Of Marriage (month, day, year): 01/17/2001
25. Place Of Marriage (county or independent city): Arlington County Virginia
26. Type Of Ceremony: xxx Civil ☐ Religious
27. I certify that I joined the above-named persons in marriage on the date and at the place specified.

Signature Of Officiant > Joseph H. Newlin
Title Of Officiant: Civil Magistrate

Authorized to perform marriages by the Circuit Court for Arlington County (city or county) Virginia, in 1982 (year of authorization)

NAME OF OFFICIANT (type or print): Joseph H. Newlin

ADDRESS OF OFFICIANT: 1500 N. Courthouse Road (street or route number), Arlington County (city or town), Va. (state) 22201

TO OFFICIANT:
Complete and sign certificates on BOTH copies
Return both copies within five days to the Clerk Of Court issuing License.
Section 32.1-267 Code Of Virginia

This is to certify that this is a true and correct reproduction or abstract of the official record filed with the Virginia Department Of Health, Richmond, Virginia

DATE ISSUED **April 16, 2025**

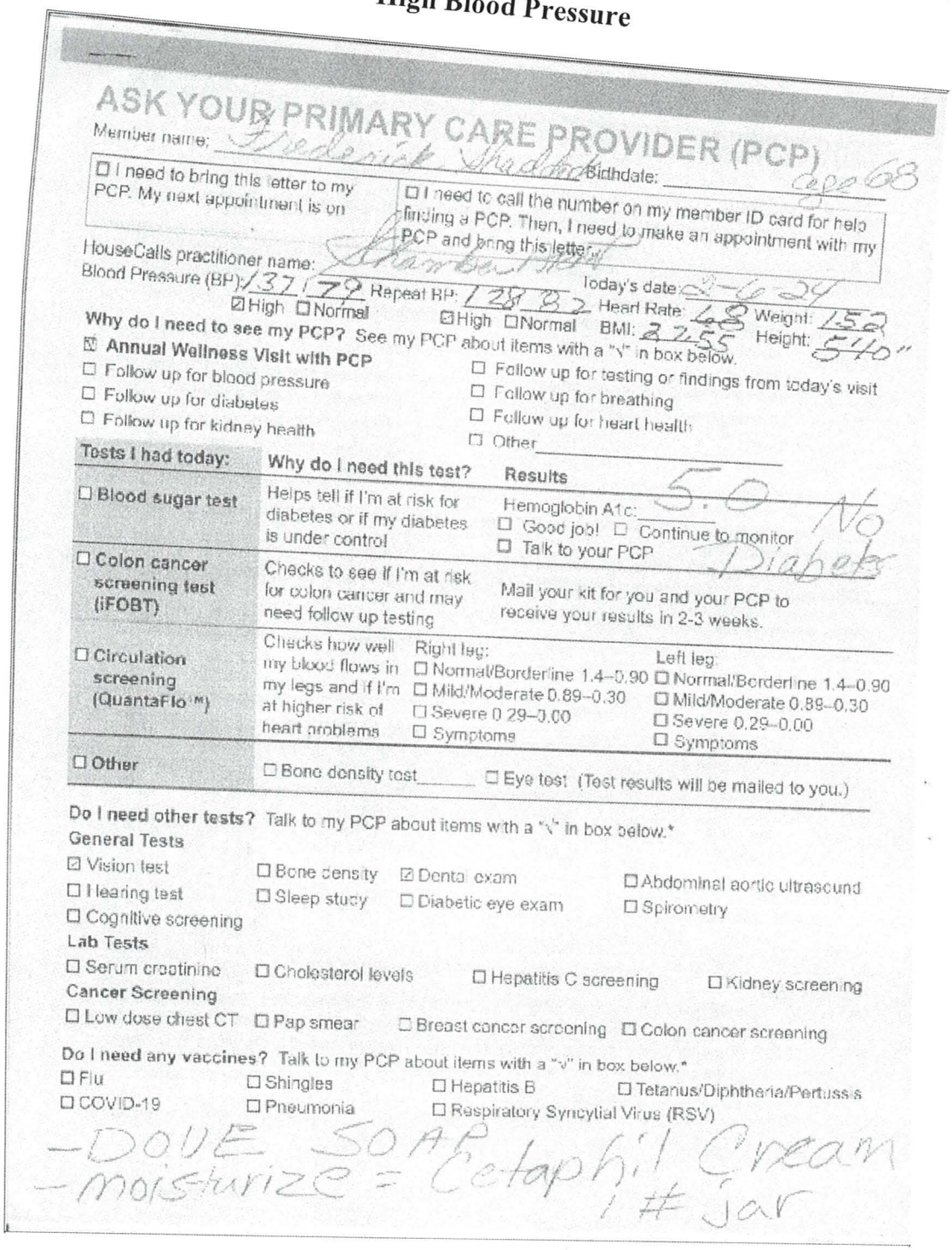
Seth Austin
Seth Austin, Director and State Registrar

Do not accept unless on security paper with the seal of Virginia Department of Health, Vital Statistics in the lower left hand corner. Section 32.1-272, Code of Virginia, as amended.

VS 15B

VOID WITHOUT WATERMARK OR IF ALTERED OR ERASED

High Blood Pressure



ASK YOUR PRIMARY CARE PROVIDER (PCP)

Member name: Frederick Shaddock Birthdate: age 68

☐ I need to bring this letter to my PCP. My next appointment is on

☐ I need to call the number on my member ID card for help finding a PCP. Then, I need to make an appointment with my PCP and bring this letter.

HouseCalls practitioner name: Lambert Abbott

Blood Pressure (BP): 137/79 Repeat BP: 128/82 Today's date: 2-6-24

☑ High ☐ Normal ☑ High ☐ Normal Heart Rate: 48 Weight: 152

BMI: 22.55 Height: 5'4"

Why do I need to see my PCP? See my PCP about items with a "√" in box below.

☒ **Annual Wellness Visit with PCP**

☐ Follow up for blood pressure

☐ Follow up for diabetes

☐ Follow up for kidney health

☐ Follow up for testing or findings from today's visit

☐ Follow up for breathing

☐ Follow up for heart health

☐ Other

Tests I had today:	Why do I need this test?	Results
☐ Blood sugar test	Helps tell if I'm at risk for diabetes or if my diabetes is under control	Hemoglobin A1c: 5.0 No Diabetes ☐ Good job! ☐ Continue to monitor ☐ Talk to your PCP
☐ Colon cancer screening test (iFOBT)	Checks to see if I'm at risk for colon cancer and may need follow up testing	Mail your kit for you and your PCP to receive your results in 2-3 weeks.
☐ Circulation screening (QuantaFlo™)	Checks how well my blood flows in my legs and if I'm at higher risk of heart problems	Right leg: ☐ Normal/Borderline 1.4–0.90 ☐ Mild/Moderate 0.89–0.30 ☐ Severe 0.29–0.00 ☐ Symptoms Left leg: ☐ Normal/Borderline 1.4–0.90 ☐ Mild/Moderate 0.89–0.30 ☐ Severe 0.29–0.00 ☐ Symptoms
☐ Other	☐ Bone density test_____ ☐ Eye test (Test results will be mailed to you.)	

Do I need other tests? Talk to my PCP about items with a "√" in box below.*

General Tests

☑ Vision test ☐ Bone density ☑ Dental exam ☐ Abdominal aortic ultrasound

☐ Hearing test ☐ Sleep study ☐ Diabetic eye exam ☐ Spirometry

☐ Cognitive screening

Lab Tests

☐ Serum creatinine ☐ Cholesterol levels ☐ Hepatitis C screening ☐ Kidney screening

Cancer Screening

☐ Low dose chest CT ☐ Pap smear ☐ Breast cancer screening ☐ Colon cancer screening

Do I need any vaccines? Talk to my PCP about items with a "√" in box below.*

☐ Flu ☐ Shingles ☐ Hepatitis B ☐ Tetanus/Diphtheria/Pertussis

☐ COVID-19 ☐ Pneumonia ☐ Respiratory Syncytial Virus (RSV)

-DOVE SOAP
-moisturize = Cetaphil Cream 1# jar

I hereby swear, under penalty of perjury, that the foregoing is true and accurate.

/s/Frederick Shaddock
Frederick Shaddock
Fred@Shaddock..net
641-819-8006

GS GRADUATE SCHOOL

600 MARYLAND AVE. SW • SUITE 180
WASHINGTON, D.C. 20024-2520

Check
Check

DETACH STATEMENT BEFORE DEP

INVOICE NUMBER	DATE	DESCRIPTION
041310	052710	COMP3211 4/13-5/27/20

THIS CHECK IS VOID WITHOUT A COLORED BACKGROUND AND AN ARTIFICIAL WATERMARK CE

GS GRADUATE SCHOOL

600 MARYLAND AVE. SW • SUITE 180
WASHINGTON, D.C. 20024-2520

WAC
OF WAS

PAY 4650

ONE THOUSAND SIX HUNDRED AND 00/100 **********

TO THE ORDER OF:

RICK SHADDOCK
520 N STREET SW SUITE S316
WASHINGTON DC 20024

⑈272061⑈ ⑆054001220⑆ 200003

WASHINGTON, DC USA
DRIVER LICENSE



4d.DLN 1301598

4b.EXP 10/

1. SHADDOCK

2. FREDERICK
JAMES

8. 520 N ST SW APT#S-316
WASHINGTON, DC 20024-4538

15.SEX	16.HGT	18.EYES	3.DOB
M	6' 0"	BRO	10/07/19

9.CLASS	9a.ENDORSEMENTS	4a.ISSUE
D	O	10/04/2025

12.RESTRICTIONS
0

5.DD 31775870

VETERAN

DONOR

From: Robert Case Liotta <rcl@ldelaw.com>
Sent: Thursday, March 5, 2026 11:33 AM
To: fred shaddock.net <fred@shaddock.net>
Cc: Oksana Shaddock <oksanashaddock@gmail.com>; Joe Pavelich <pavelich@spiespavelich.com>
Subject: FOR SETTLEMENT PURPOSES ONLY Re: Proposal to Resolve Key Fob Access Without Further Litigation – Case No. 2025-CAB-004804

Dear Mr Shaddock

I am confused by your demands. The DC Court has dismissed all of your motions that basically requested that it rule that the DC Apartment is marital or that you had any rights of occupancy. Any new complaints will be dismissed on the ground of res judicata. I will also request sanctions for the filing of a frivolous law suit.

As I have said many times, the apartment is titled solely to Oksana and you have no rights of occupancy. In a divorce trial you may or may not be granted some monetary award because you were married when the property was purchased . I am unaware of any cases that would suggest that you would get rights of occupancy of property titled to someone else merely because you are married to the owner.

Given the situation, I am requesting that you vacate the property before March 15 to avoid ejectment. You have no right to be occupying that property and you have zero legal standing to rent out someone else's property.

One would think that after your defeats in both the DC and Iowa courts on your groundless claims that you would understand that you are wrong with regard to your interpretation of the law.

Please also note that Oksana can be awarded attorney's fees to be paid by you at the conclusion of the divorce and the fees that she has had to pay defending against your groundless litigation could be ordered to be reimbursed to her by you.

Notwithstanding the above, Mr Pavelich and I remain ready to have good faith settlement discussions with you to finalize a Marital Settlement Agreement. I believe you have the draft of such an Agreement. We could start negotiations by you reviewing the draft and then sending it to either Mr Pavelich or me with your specific proposed edits.

Sincerely,
Robert Liotta

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