RETURN DATE: MAY 4, 2021 : SUPERIOR COURT

DAVID B. FORD, JR., EXECUTOR OF THE :

ESTATE OF DAVID B. FORD, : J.D. OF FAIRFIELD

JAMES M. FORD, EXECUTOR OF THE :

ESTATE OF DAVID B. FORD, 646 BELLEVUE, LLC,

WARRENTON, LLC and : DBF ASSOCIATES, INC. :

:

V. : AT BRIDGEPORT

PAMELA FIELDER FORD : APRIL 14, 2021

## APPLICATION FOR TEMPORARY INJUNCTION AND ORDER TO SHOW CAUSE

The Plaintiffs, Plaintiffs, David B. Ford, Jr., Executor of the Estate of David B. Ford, James M. Ford, Executor of the Estate of David B. Ford, 646 Bellevue, LLC, Warrenton, LLC, and DBF Associates, Inc. ("Plaintiffs"), hereby make this application for a temporary injunction in accordance with their prayer for relief, and respectfully request that a temporary injunction be issued Defendant **Pamela Fielder Ford** (the "Defendant" or "Ms. Ford") from taking any action to convey, deliver, transfer, hypothecate, pledge, or sell to any third party, or to encumber or dilute, any assets of the Estate (whether directly owned by the Estate or indirectly through an entity owned by the Estate, including, but not limited to, any of the other Plaintiffs to this action), including, but not limited to, any asset that is contained, referenced, or reflected in any of the Gift Letters (copies of which are attached to the Verified Complaint filed herewith).



The Plaintiffs further request that Defendant be ordered to appear at an early date to show cause why the prayer for a temporary injunction should not be granted.

#### THE PLAINTIFFS,

DAVID B. FORD, JR., EXECUTOR OF THE ESTATE OF DAVID B. FORD; JAMES M. FORD, EXECUTOR OF THE ESTATE OF DAVID B. FORD; 646 BELLEVUE, LLC; WARRENTON, LLC; and DBF ASSOCIATES, INC.

By:

Philip C. Pires, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604 Tel. (203) 337-4122

Email: ppires@cohenandwolf.com Juris No. 010032

RETURN DATE: MAY 14, 2021 : SUPERIOR COURT

DAVID B. FORD, JR., EXECUTOR OF THE :
ESTATE OF DAVID B. FORD,
JAMES M. FORD, EXECUTOR OF THE :
ESTATE OF DAVID B. FORD,
646 BELLEVUE, LLC,
WARRENTON, LLC and
DBF ASSOCIATES, INC.

V. AT BRIDGEPORT
PAMELA FIELDER FORD

## ORDER TO SHOW CAUSE

WHEREAS, the foregoing Complaint with Prayer and Application for Temporary Injunction, duly verified, has been presented to the Court, and

WHEREAS, upon Application of the Plaintiffs, it appears that an Order should be issued directing Defendant in this action to appear before the Court to show cause why a Temporary Injunction should not issue,

NOW, THEREFORE, it is ORDERED that Defendant be summoned to appear before
the Superior Court for the Judicial District of Fairfield at Bridgeport, located at 1061 Main
Street, Bridgeport, Connecticut, Courtroom (or at a virtual courtroom as may be ordered by
the Court), on the day of, 2021, at o'clock in them., then and there to
show cause why a temporary injunction should not issue against it as prayed for in the foregoing
Complaint and Application.

IT IS FURTHER ORDERED, that Defendant be served with true copies of the foregoing Order to Show Cause, and any supporting papers, on or before \_\_\_\_\_\_\_, 2021.



Dated at Bridgeport, Connecticut, this day of	, 2021.
BY THE COURT,	
Judge / Asst Clark of the	Court

RETURN DATE: MAY 14, 2021 : SUPERIOR COURT

:

DAVID B. FORD, JR., EXECUTOR OF THE

ESTATE OF DAVID B. FORD, : J.D. OF FAIRFIELD

JAMES M. FORD, EXECUTOR OF THE

ESTATE OF DAVID B. FORD, :

646 BELLEVUE, LLC, : WARRENTON, LLC and ::

DBF ASSOCIATES, INC.

AT BRIDGEPORT

:

PAMELA FIELDER FORD

## PROPOSED ORDER FOR TEMPORARY INJUNCTION

The Plaintiffs' Verified Complaint and Application for a Temporary Injunction having come before the Court pursuant to an Order to Show Cause why a temporary injunction should not issue as requested; and

\_\_\_\_ The parties appeared and were fully heard or

\_\_\_\_ Defendant was duly notified of the order as appears by the officer's return endorsed thereon, but Defendant failed to appear;

AND it appearing to the Court that a temporary injunction ought to issue, and that, for good cause shown, the Court is of the opinion that the Temporary Injunction ought to issue without bond, and Defendant is hereby prohibited from taking any action to convey, deliver, transfer, hypothecate, pledge, or sell to any third party, or to encumber or dilute, any assets of the Estate (whether directly owned by the Estate or indirectly through an entity owned by the Estate, including, but not limited to, any of the other Plaintiffs to this action), including, but not limited to, any asset that is contained, referenced, or reflected in any of the Gift Letters.



V.

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