

FBT-FA19-5040574-S

SUPERIOR COURT

JORIZ TIBERI

JUDICIAL DISTRICT OF FAIRFIELD

VS.

AT BRIDGEPORT

FRANK TIBERI

FEBRUARY 22, 2022

DEFENDANT'S PROPOSED ORDERS FOR TRIAL – AMENDED

1. The Husband shall have sole legal and physical custody of the parties' minor son age 6. The mother shall refrain from contacting the school and the medical providers tending to the minor child and the mother shall not interfere with any treatment of the child and/or any appointments for the child and may not interfere with the minor child's schooling.
2. The Wife shall have supervised parenting time with the minor child on Sundays from 12 noon to 2 pm. The Wife, accompanied by the supervisor, shall pick up and drop off the child from the Husband at her sole cost and expense. At the time of the pick up and drop off of the minor child, the Wife shall remain in her vehicle and she shall refrain from speaking with the Husband and be prohibited from calling the Husband names, yelling at the Husband and following the Husband. The Wife shall not remove the child from the State of Connecticut during her parenting time. The Wife shall not take the child to any medical appointments during her parenting time.
3. The Wife's parenting time shall remain supervised until the Wife demonstrates significant improvement in her interactions with the minor child and the Wife participates in therapy with

a therapist credentialled as recommended by Dr. Biren Caverly. Husband's Motion for Contempt #194 shall be granted.

4. The Wife shall follow the recommendations included in the psychological evaluation of Dr. Jessica Biren Caverly (See Defendant's H) and she may not seek a modification of her parenting time until she completes the therapy recommendations in Dr. Biren Caverly's report.
5. There shall be an automatic suspension of the Wife's parenting time if unfounded or repetitive statements are made by the Wife to the minor child or to third parties consistent with previously debunked allegations about the Husband.
6. The Wife shall pay no child support to Husband. The Husband agrees to a downward deviation of child support to zero in light of the cost for the supervision. The Child Support Guidelines provide that child support paid by Wife to Husband would be \$66 per week using Husband's income and imputing minimum wage to Wife.
7. The Husband shall pay all extracurricular activity costs for the minor child. The Wife may not sign up the minor child for any extracurricular activity.
8. The Husband shall pay work related childcare costs for the minor child for childcare on his parenting days. The Wife may not interfere with the childcare providers for the Husband.
9. The Husband shall provide health insurance for the minor child. All unreimbursed health costs for the minor child shall be paid by Husband. Wife shall not incur any non-emergency health care costs for the minor child. The Wife may not interfere with the medical care

providers for the minor child. The Wife may not take the minor child to any medical appointments without the express written consent of the Husband.

10. If the minor child's counselor recommends continued counseling for the parties' minor child, then the mother shall not participate in the minor child's counseling and/or therapy unless at the express request of the minor child's therapist.
11. The Husband is not obligated to participate in counseling. Husband's Motion #219 shall be granted.
12. In the event that supervised parenting time is ordered by the Court, the Wife shall be solely responsible for the payment of any supervised parenting time for her. Husband's Motion for Modification #265 shall be granted.
13. The Wife shall not record the minor child during her parenting time. The Husband's Motion for Order #195 shall be granted.
14. The Mother shall not post any photos or videos of the minor child on any social media site.
15. The Wife shall pay no alimony to the Husband.
16. The Husband shall pay no alimony to the wife.
17. The Husband shall pay Wife's Discover card directly within 30 days of the divorce. This bill is currently in litigation. If necessary, Wife will sign an authorization that allows counsel for Discover to talk with Husband directly.

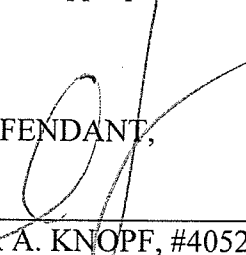
18. The Husband shall retain the real property located at 6 Birdseye Road, Shelton, Connecticut free and clear from any claim or demand by Wife. Husband shall pay all costs for this property without contribution from the Wife.
19. The Husband shall retain his interest in his dental practice free and clear from any claim or demand by the Wife.
20. The Husband shall retain his SEP IRA free from any claim or demand by the Wife in light of the payments he made as follows on behalf of the Wife, because of the Wife's conduct during the marriage and during the divorce and for the benefit of the Wife: \$15,000 for a psychological evaluation; \$6,000 for the testimony of Dr. Biren Caverly, \$42,000 to date to the Guardian Ad Litem for her fees; \$20,000 as counsel fees for the Wife; the Husband's counsel fees; \$10,000 paid for the Wife to exercise her supervised parenting time, including all of the fees due to Lisa Kerin; \$5,000 paid to Lisa Kerin for Husband's supervised parenting time after the Wife's false claims in an ex-parte; \$15,000 paid to the wife when she was court ordered to relocate from the marital home: approximately \$10,000 to replace the household furnishings and contents (master bedroom furniture, dining room furniture, and outdoor grill which she kept, the washer and dryer, sofas and televisions which she ultimately returned at a cost to the Husband), funds the Husband spent for hotel rooms after the Wife's ex-parte based on debunked statements; \$2,000 for deposition fees, and all of the monies paid to the wife per pendente lite orders of the court for her housing during the nearly three years that this matter has been pending (approximately \$47,700).

21. All financial accounts in the name of the Wife shall remain hers free from any claim or demand by the Husband.
22. Each party shall retain the vehicle that he/she presently drives, and each party shall be solely responsible for all costs associated with his/her vehicle, past, present and future.
23. The Wife shall not disseminate the following absent a court order or consent of the Husband in writing notarized: any financial information provided to her during discovery of the matter, the Husband's financial affidavit, and the psychological evaluation. Husband's Motion for Contempt regarding disseminating the psychological evaluation #241 shall be granted. Husband's Motion for Order #314 shall be granted.
24. In lieu of life insurance, the Husband maintain the parties' minor child as beneficiary of 50% of his SEP IRA and 50% of his estate.
25. Each party shall provide for his own or her own health insurance.
26. Each party pays his/her debts except the Husband shall pay the debt to Discover as herein provided.
27. The Court shall retain jurisdiction for post majority educational support per Connecticut General Statute Section 46b-56c.
28. The Husband's Motions to Modify the pendente lite orders of January 3, 2020 (Motions to Modify #s 192, 197, and 208) shall be granted. Husband's obligation to pay \$500 per week to Wife shall be reduced retroactive to February 19, 2020. The Husband made any overpayment to the Wife, the Husband waives his claim against the Wife for the return of any overpayment.

29. The Husband's Motions for Order to expunge pleadings (#290, #312 and #313) shall be granted.
30. The Husband shall not contribute to the Wife's counsel fees incurred in this matter.
31. The Wife shall not contribute to the Husband's counsel fees incurred in this matter.
32. The Wife shall pay 50% of all fees incurred by the Guardian Ad Litem on and after July 30, 2021.
33. Following the many motions filed by the Wife, many of which are duplicative of prior motions and many of which do not comply with the Connecticut Practice Book in that they are either argumentative or lacking in form, a "Strobel Order" shall enter such that the Wife must request leave of the court to file any new motions using the appropriate form on the judicial website.

THE DEFENDANT,

BY:



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CERTIFICATION

I hereby certify that a copy of the foregoing was sent on the above date to Attorney Janis Laliberte by email to janislaliberte@jllalibertelaw.com and the Plaintiff at supermom2015@proton.com on the date set forth above.



LISA A. KNOPF