

CATHY L. KAMBER, P.A.

ATTORNEYS AT LAW

1675 PALM BEACH LAKES BOULEVARD

THE FORUM, TOWER A

SUITE 700

WEST PALM BEACH, FLORIDA 33401

CATHY L. KAMBER

ADMITTED TO PRACTICE IN FLORIDA AND NEW YORK

KENNETH H. RENICK

RETIRED

April 20, 2005

TELEPHONE

(561) 868-1602

FAX NO.

(561) 868-1544

Clerk of the Circuit Court
Fifteenth Judicial Circuit
205 North Dixie Highway, Attn: Family Division
West Palm Beach, Florida 33401

Re: Cabana v. Mayo
Case No: 50 1971 DR004137XXDIFD

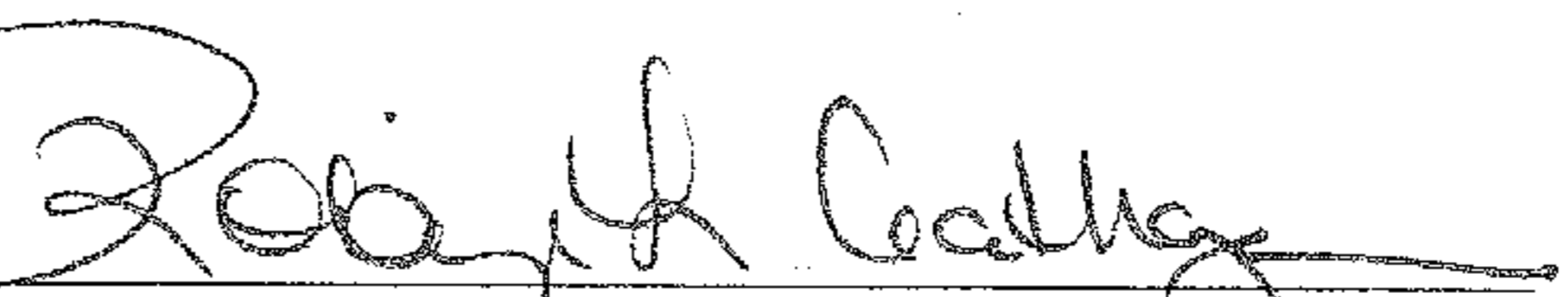
Dear Clerk:

Enclosed please find the original and one copy of that certain "Former Wife's Amended Motion for Contempt". Please forward a date stamped copy of same to General Master Leonard Hanser via interoffice mail.

Thank you in advance for your anticipated cooperation.

Very truly yours,

CATHY L. KAMBER, P.A.

By: 

Robin L. Gathagan, Paralegal to
Cathy L. Kamber

Enclosure

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE: THE MARRIAGE OF

CASE NO: 501971DR004137XXDIFD

WILLIAM A. CABANA,
Petitioner/Former Husband,

FAMILY DIVISION

and

SHARON ANN MAYO f/k/a
SHARON ANN CABANA
Respondent/Former Wife.

FORMER WIFE'S AMENDED MOTION FOR CONTEMPT

COMES NOW the Former Wife, SHARON ANN MAYO, by and through her undersigned counsel, files her Motion for Contempt and in support thereof states as follows:

1. On or about July 28, 1972, this Honorable Court entered that certain Final Judgment Dissolving Marriage, wherein Former Husband was ordered, *inter alia* to pay to Former Wife child support in the amount of \$50.00 per week and permanent periodic alimony in the sum of \$25.00 per week. (Docket Entry 20)
2. On or about October 21, 1986, this Honorable Court further entered that certain Amended Final Judgment, adjudicating Former Husband's alimony and child support arrearages in the amount of \$40,703.45, together with interest at the rate of 12% per year.(Docket Entry 27)
3. On January 25, 1991, this Honorable Court entered that certain Order adjudicating Former Husband in contempt, assessing Former Husband's support arrearages in the amount \$46,016.45, ordering Former Husband's confinement, but permitting him to

purge by:

- (a) paying \$5,000.00 instanter;
- (b) paying \$100.00 purge per week; and
- (c) additionally keeping current in the regular court ordered alimony

payment.

4. Former Husband has failed to keep current in his alimony payments and to pay the weekly purge as previously ordered by the Court.

5. Former Husband has failed to make any payments to Former Wife whatsoever since August 15, 2003, and previously failed to make payments pursuant to Court Orders.

6. The Former Wife will further apply for an adjudication of contempt as to all installments of current and purged support that come due prior to the hearing of the instant motion.

7. Former Husband's failure to make payments to Former Wife is wilful, intentionally disobedient and contemptuous.

8. The Former Wife has retained the services of your undersigned counsel and has incurred attorneys fees as a result of Former Husband's noncompliance, for all of which Former Husband should be held answerable.

Former Wife has additionally incurred costs, including the services of a certified public accountant, in connection with the prosecution of the instant motion, for which the Former Husband should be held answerable. Former Wife has further retained the services of separate counsel to defend her and resist the removal of the instant action to Federal Court,

for which Former Husband should be held answerable.

WHEREFORE Former Wife prays that this Honorable Court enter an Order adjudicating Former Husband in contempt, ordering his instantter incarceration pending payment of all support arrears, for an award of attorneys fees and costs and for such and other relief as may be proper.

I HEREBY CERTIFY that a true copy of the foregoing was furnished by mail to: Mr. William A. Cabana, Pro Se, 1050 Capri Isles Blvd., #F105, Venice, FL 34292, this 20th day of April, 2004.

CATHY L. KAMBER, P.A.
Attorneys for Former Wife
1675 Palm Beach Lakes Blvd.
Suite 700
West Palm Beach, FL 33401
(561) 868-1602

By: 

CATHY L. KAMBER, ESQ.
Florida Bar #312819