

IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA

NATHAN WADE,

Plaintiff,

v.

JOYCELYN WADE,

Defendant.

CIVIL ACTION
FILE NO. 21-1-08166-68


Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR TEMPORARY
HEARING AND MOTION FOR INTERIM ATTORNEY'S FEES
AND EXPENSES OF LITIGATION**

COMES NOW, NATHAN WADE, Plaintiff in the above-styled matter, by and through his counsel of record, and files this his *Response to Defendant's Motion for Temporary Hearing and Motion for Interim Attorney's Fees and Expenses of Litigation* and responds as follows:

1.

This case is a divorce case that was filed November 2, 2021.

2.

During the pendency of this divorce, and contrary to the Defendant's assertions in her motion, the Plaintiff has provided means of financial support to the Defendant and continues to provide financial support to the Defendant.

3.

The parties, by and through their counsel (Plaintiff's previous counsel) have engaged in discovery during the divorce. Indeed, the parties, by and through their counsel (Plaintiff's current counsel) are continuing to engage in discovery as the Court entered its order re opening

discovery. Additionally, Defendant's counsel has propounded third party discovery to Fulton County and has received from responses from Fulton County.

4.

The parties, by and through counsel, are also in the process of scheduling mediation in this matter.

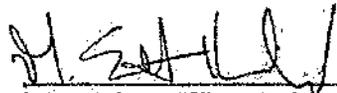
5.

Given the age of this case, the undersigned believes that the most efficient and proper course of action would be for the parties to enter into a scheduling order, or for the Court to enter a scheduling order, requiring mediation by a certain date and setting a final hearing date.

WHEREFORE, Plaintiff respectfully prays that Defendant's Motion be denied.

Respectfully submitted this 22nd day of December, 2023.

DUPREE, KIMBROUGH & CARL, LLP



M. SCOTT KIMBROUGH
Georgia State Bar No. 418998
Attorney for Plaintiff

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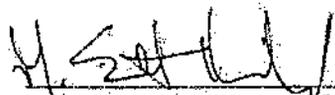
CERTIFICATE OF SERVICE

This is to certify that I have this day served upon opposing counsel a true and exact copy of the above and foregoing *Response to Defendant's Motion for Temporary Hearing and Motion for Interim Attorney's Fees and Expenses of Litigation* upon the following parties via email and by depositing a copy of same in the United States Mail with adequate postage affixed thereon and addressed to the following:

Andrea Dyer Hastings, Esq.
Mali C. Shadmery, Esq.
Keesha C. Robinson, Esq.
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This 22nd day of December, 2023.

DUPREE, KIMBROUGH & CARL, LLP



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