IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

PORSHA DYANNE WILLIAMS,)
Datition on)
Petitioner,) CIVIL ACTION
) CIVIL ACTION
V.) FILE NO.: 24CV002165
)
SIMON IYORE GUOBADIA,)
a/k/a IYORE GUOBADIA)
)
Respondent.)
)

MOTION FOR TEMPORARY RELIEF, POSSESSION OF MARITAL RESIDENCE, RESTRAINING ORDER AND MOTION FOR CONTEMPT

COMES NOW, SIMON IYORE GUOBADIA, Respondent named herein ("Respondent" or "Husband"), by and through the undersigned counsel of record, Onyema A. Farrey, Esq., and hereby files and serves upon Petitioner PORSHA DYANNE WILLIAMS, pursuant to USCR 24.2 this Motion for Temporary Relief, Possession of Marital Residence, Restraining Order, and Motion for Contempt and states the following in support:

1.

The parties were married on November 26, 2022.

2.

Prior to the parties' marriage, the Husband purchased the home located at 4544 Peachtree Dunwoody Road, NE, Atlanta, GA 30342 ("Marital Residence") solely from his personal funds.

3.

After intentionally creating a media frenzy regarding matters bearing no effect on the parties' marriage, on February 22, 2024 without any forewarning or communication to Husband, Wife suddenly filed for divorce after the parties had been married just over a year.

Upon information and belief, Wife took calculated steps to marry Husband only to

subsequently divorce him just 14 months later in order to intentionally trigger the provisions of

the parties' prenuptial agreement, for her personal financial gain and greed.

5.

After filing divorce, the Wife abandoned the Marital Residence without having any prior

discussions with her Husband as to how matters regarding their household—or marriage—would

be handled moving forward.

6.

Since her abrupt departure, Wife has been living at an unknown location while the

Husband and his minor children have been living in the Marital Residence.

7.

At all times relevant, the Husband has solely maintained the payments and upkeep to the

Marital Residence without any contributions whatsoever from his Wife.

8.

The Wife appeared at the Marital Residence on five (5) separate occasions since she

abandoned the home. On two of those occasions—including the incident on March 21, 2024—

the Wife appeared at the Marital Residence with a man visibly bearing a gun for reasons

unknown to Respondent.

9.

Given the unannounced presence of Wife and an armed gunman, police had to be called

to maintain the peace on at least one of those occasions.

Wife's presence at the Marital Residence with the armed gunman was frightening for the

third parties that were present at the home.

11.

Furthermore, Wife has been directing third parties to call and harass individuals at the

Marital Residence in an effort to force them out of the home without any regard for order and

due process through the legal system.

12.

As of recent, on or about March 24, 2024 the Wife, along with her Mother and Mother's

boyfriend, made forcible entry into the Marital Residence, disengaged the security cameras, and

tampered with items and evidence in the home.

13.

The Wife forced the presence of the children out of the bedroom and began yelling

throughout the home and making disparaging remarks about the Respondent—in the earshot of

the children.

14.

Since the filing of the instant divorce, Wife's actions have been erratic, unstable,

threatening, and harassing to Petitioner, the house staff, and the minor children.

15.

Wife's behavior has caused safety concerns, especially since there are minor children—

Husband's children—currently living in the Marital Residence.

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On March 15, 2024 and March 21, 2024, the undersigned counsel for Husband reached

out to Wife's attorney in attempts to make a good faith effort to resolve the emergent issues

between the parties peaceably without the court's intervention. Those efforts failed and were met

with rejection from Wife without any explanation of Wife's motives.

17.

During the pendency of this divorce, Wife has also sent communications directly to

Husband wherein Wife seeks to blackmail Husband indicating that she will disseminate

information to the media about Respondent.

18.

On February 22, 2024, this Court issued a court order—Amended Automatic Domestic

Standing Order—that states, "Each party is enjoined and restrained from doing any act injuring,

maltreating, vilifying, threatening, molesting, or harassing the adverse party, the child(ren) of

the parties, or a family member of the adverse party."

19.

As described herein, Wife has intentionally violated the Standing Order by maltreating,

vilifying, threatening, molesting, and harassing the Husband, the family/children, and house staff

of Husband.

20.

Unfortunately, the Wife has had no respect or regard to the court and this judicial process

and thus, has relegated to self-help by taking matters into her own hands. Therefore, it is

necessary to have this court intervene.

Husband requests that this Court finds Wife in willful contempt of the February 22, 2024

Standing Order and issues a restraining order against Wife to refrain from the aforementioned

acts, and restrain Wife from contacting Husband and his family.

22.

There has been no formal adjudication of the parties' prenuptial agreement as no court

has determined the validity, interpretation, or enforceability of the same.

23.

Therefore, this Court should maintain the status quo of matters as of the time that the

Petitioner filed this divorce---with Husband and his children remaining in the Marital Residence

for which Husband pays.

24.

Until such time that there has been an entry of a Final Judgment and Decree of divorce,

Husband requests immediate temporary and sole use and possession of the Marital Residence—

free and clear from Wife.

25.

It is not necessary for Wife to occupy possession of the marital residence as Wife has a

separate home that she purchased prior to the marriage that is located in Gwinnett County that

she can occupy.

26.

It would be unfair for Wife to remain in possession of the Marital Residence—without

paying for the same—while also having a separate residence in Gwinnett County that she can

occupy during the pendency of this divorce.

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Respondent also requests that this Court awards him attorney's fees pursuant to O.C.G.A.

§ 9-15-14 for Petitioner's actions necessitating the filing of this Motion.

28.

Equity demands that this Court issues an order granting the temporary and immediate

relief as requested herein.

WHEREFORE, Respondent prays that,

(a) This Court grants this Motion for Temporary Relief, Possession of Marital Residence

and Motion for Contempt;

(b) This Court issues an order allowing Respondent to continue to maintain exclusive

use, possession and control of the Marital Residence;

(c) This Court finds Petitioner in willful contempt of the Amended Automatic Domestic

Standing Order and issues sanctions and fines against Petitioner accordingly;

(d) That this Court restrains Petitioner from committing acts against Respondent, his

family, children and house staff as described in this Motion;

(e) That this Court awards Respondent attorney's fees in accordance with O.C.G.A. § 9-

15-14 and any relevant statute;

(f) For any additional relief that this Court finds just and proper.

Respectfully submitted this 25th day of March, 2024.

ANENE FARREY & ASSOCIATES, LLC

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Respondent.))

CERTIFICATE OF SERVICE

This is to certify that I have on this day served a copy of the attached **Motion for Temporary Relief, Possession of Marital Residence, Restraining Order and Motion for Contempt** to all relevant parties via statutory electronic service pursuant to USCR 36.16(E) and O.C.G.A. § 9-11-5 addressed as follows:

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Submitted this 25th day of March 2024.

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