

VIRGINIA: IN THE CIRCUIT COURT FOR THE COUNTY OF LOUISA

THOMAS ALEXANDER GARRETT, JR.,

Plaintiff,

v.

Case No. CL19-417-00

FLANNA SHERIDAN GARRETT,

Defendant.

**MOTION FOR ENRTY OF "GAG ORDER"**

COMES NOW the Plaintiff, Thomas Alexander Garrett, Jr., by counsel, and moves the Court to enter a "Gag Order" limiting what is discussed in this case and with whom, and in support thereof, the Plaintiff says the following:

1. This is a highly contentious divorce case.
2. The Plaintiff (Husband) and the Defendant (Wife) are currently living separate and apart.
3. Proceedings regarding custody and visitation of their minor child were adjudicated in the Louisa J&DR District Court, and that ruling is now on appeal to this Court. To date, no trial date has yet been set.
4. In addition to the divorce case, the Wife has also filed a separate suit in Rockingham County Circuit Court in which the Husband is one of three named defendants. She is seeking actual damages of \$100,000.00, and punitive damages of \$350,000.00.
5. The Husband is a former United States Congressman having represented the Fifth Congressional District of Virginia.

6. Husband has information and belief that Wife has contacted various former members of the Trump Administration and/or their spouses, congressional members and/or their spouses, and other influential political contacts and/or their spouses in a campaign to discredit and criticize the Husband.

7. On August 7, 2019, Wife told Elizabeth Blake, that she wanted to “ruin Tom, bankrupt him, and take all of his money, and do anything she could to prevent him from making money.” Prior to that occasion, the Wife showed Elizabeth Blake a picture of Husband with a gun to his head that was from 2014. She also played audio recordings of communications between her and the Husband which she indicated to Ms. Blake were arguments. *See* attached affidavit of Elizabeth Blake.

8. Husband has reason to believe that Wife has shown the 2014 picture of him with a gun to his head to others.

9. Wife has issued a subpoena *duces tecum* to Verizon seeking various information as to persons and entities that Husband has communicated with.

10. Wife has made various allegations regarding Husband.

11. Husband has reasonable belief that Wife is determined to discredit and destroy him and to prevent him from securing gainful employment.

12. Given that no trial date has yet been set, this case is likely to be pending for an extended period.

13. There is no reason why either party needs to discuss facts regarding their marriage or this case (or allegations regarding the other party) with others. Rather, communications

regarding the facts of this case, and the various allegations either may have against the other, should be expressly limited to counsel and their respective staffs, to any experts retained by either party, to medical and mental health professionals inc. counselors / therapists, and to such religious clergy as either party may communicate with.

14. Moreover, there is also good cause to seal the Court's file, so that the contents therein are not available to members of the public or the press.

15. An article has already recently run in the Harrisonburg newspaper (which Husband alleges was at Wife's request or at least with her approval) detailing the various allegations Wife was making against Husband in the civil suit pending in that case.

16. Husband is concerned that if a gag order is not entered in this case, that his ability to obtain future employment will be negatively affected, as his current consulting opportunity has not been renewed and he is seeking employment. His ability to secure employment impacts on the issue of support, and his ability to represent himself in these divorce proceedings, plus the proceedings pending in the J&DR District Court and in the Rockingham County Circuit Court case.

17. A mutual "gag order" is in the interest of justice. There is no reason that either party should be or need be discussing facts regarding this case with members of the general public, nor disseminating or distributing case documents or case information to members of the general public.

WHEREFORE, the above considered, the Husband respectfully requests that the Court enter an appropriate "Gag Order" in this case consistent with the terms herein so as to maintain confidentiality and to preserve employment opportunities; that the Court's file be sealed; that the