



State Statutory Provisions Addressing issuance of a Mutual Protection Order or Cross-Orders

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STATE	Statutory Language on Whether a Court May Enter Mutual Protection Order Provisions and/or Enforcement of Mutual Protection Order
ALABAMA	<p style="text-align: center;">Ala. Code §30-5-5(d)</p> <p>(d) The court shall not enter mutual orders. The court shall issue separate orders that specifically and independently state the prohibited behavior and relief granted in order to protect the victim and the victim's immediate family and to clearly provide law enforcement with sufficient directives.</p> <p style="text-align: center;">Ala. Code § 30-5B-3(h)</p> <p>(h) A court of this state may enforce provisions of a mutual foreign protection order which favor a respondent only if both of the following criteria are met:</p> <ul style="list-style-type: none"> (1) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state. (2) The tribunal of the issuing state made specific findings in favor of the respondent.
ALASKA	<p style="text-align: center;">Alaska Stat. §18.66.130(b)</p> <p>(b) A court may not grant protective orders against the petitioner and the respondent in the same action under this chapter.</p>
AMERICAN SAMOA	Statute is silent
ARIZONA	<p style="text-align: center;">Ariz. Rev. Stat. Ann. §13-3602(H)</p> <p>The court shall not grant a mutual order of protection. If opposing parties separately file verified petitions for an order of protection, the courts after consultation between the judges involved may consolidate the petitions of the opposing parties for hearing. This does not prohibit a court from issuing cross orders of protection.</p> <p style="text-align: center;">Ariz. Rev. Stat. Ann. § 13-3602(V)(3)</p> <p>3. A mutual protection order that is issued against both the party who filed a petition or a complaint or otherwise filed a written pleading for protection against abuse and the person against whom the filing was made is not entitled to full faith and credit if either:</p> <ul style="list-style-type: none"> (a) The person against whom an initial order was sought has not filed a cross or counter petition or other written pleading seeking a protection order. (b) The issuing court failed to make specific findings supporting the entitlement of both parties to be granted a protection order.
ARKANSAS	<p style="text-align: center;">Ark. Code Ann. § 9-15-216</p> <ul style="list-style-type: none"> (a) Except as provided in subsection (b) of this section, a circuit court shall not grant a mutual order of protection to opposing parties. (b) Separate orders of protection restraining each opposing party may only be granted in cases in which each party:

STATE	Statutory Language on Whether a Court May Enter Mutual Protection Order Provisions and/or Enforcement of Mutual Protection Order
	<p>(1) Has properly filed and served a petition for an order of protection; (2) Has committed domestic abuse as defined in § 9-15-103; (3) Poses a risk of violence to the other; and (4) Has otherwise satisfied all prerequisites for the type of order and remedies sought.</p>
CALIFORNIA	<p style="text-align: center;">Cal. Fam. Code § 6305</p> <p>(a) The court shall not issue a mutual order enjoining the parties from specific acts of abuse described in Section 6320 unless both of the following apply: (1) Both parties personally appear and each party presents written evidence of abuse or domestic violence in an application for relief using a mandatory Judicial Council restraining order application form. For purposes of this paragraph, written evidence of abuse or domestic violence in a responsive pleading does not satisfy the party's obligation to present written evidence of abuse or domestic violence. By July 1, 2016, the Judicial Council shall modify forms as necessary to provide notice of this information. (2) The court makes detailed findings of fact indicating that both parties acted as a primary aggressor and that neither party acted primarily in self-defense.</p> <p>(b) For purposes of subdivision (a), in determining if both parties acted primarily as aggressors, the court shall consider the provisions concerning dominant aggressors set forth in paragraph (3) of subdivision (c) of Section 836 of the Penal Code.</p> <p style="text-align: center;">Cal Fam Code § 6402(g)</p> <p>(g) A tribunal of this state may enforce provisions of a mutual foreign protection order which favor a respondent only if both of the following are true: (1) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state. (2) The tribunal of the issuing state made specific findings in favor of the respondent.</p>
COLORADO	<p style="text-align: center;">Colo. Rev. Stat. § 13-14-106(3)</p> <p>(3) A court shall not grant a mutual protection order to prevent domestic abuse for the protection of opposing parties unless each party has met his or her burden of proof as described in section 13-14-104.5 (7) and the court makes separate and sufficient findings of fact to support the issuance of the mutual protection order to prevent domestic abuse for the protection of opposing parties. A party may not waive the requirements set forth in this subsection (3).</p>
CONNECTICUT	Statute is silent.
DELAWARE	<p style="text-align: center;">Del. Code Ann. tit. 10, § 1049B(g)</p> <p>(g) The Court may enforce provisions of a mutual foreign protection order which favor a respondent only if: (1) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and (2) The tribunal of the issuing state made specific findings in favor of the respondent.</p>

STATE	Statutory Language on Whether a Court May Enter Mutual Protection Order Provisions and/or Enforcement of Mutual Protection Order
DISTRICT OF COLUMBIA	<p style="text-align: center;">D.C. Code § 16-1042(g)</p> <p>(g) A tribunal of the District may enforce provisions of a mutual foreign protection order which favor a respondent only if:</p> <ul style="list-style-type: none"> (1) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing State; and (2) The tribunal of the issuing State made specific findings in favor of the respondent.
FLORIDA	<p style="text-align: center;">Fla. Stat. § 741-30(1)(i)</p> <p>(i) The court is prohibited from issuing mutual orders of protection. This does not preclude the court from issuing separate injunctions for protection against domestic violence where each party has complied with the provisions of this section. Compliance with the provisions of this section cannot be waived.</p>
GEORGIA	<p style="text-align: center;">Ga. Code Ann. §19-13-4(a)</p> <p>(a) The court may, upon the filing of a verified petition, grant any protective order or approve any consent agreement to bring about a cessation of acts of family violence. The court shall not have the authority to issue or approve mutual protective orders concerning paragraph (1), (2), (5), (9), or (11) of this subsection, or any combination thereof, unless the respondent has filed a verified petition as a counter petition pursuant to Code Section 19-13-3 no later than three days, not including Saturdays, Sundays, and legal holidays, prior to the hearing and the provisions of Code Section 19-13-3 have been satisfied.</p>
GUAM	Statute is silent.
HAWAII	<p style="text-align: center;">Haw. Rev. Stat. § 586-12</p> <p>No protective order shall be entered against the plaintiff in the same petition unless:</p> <ul style="list-style-type: none"> (1) The respondent properly files a separate petition; and (2) The plaintiff has reasonable notice of the filing of the separate petition.
IDAHO	<p style="text-align: center;">Idaho Code § 39-6306A(2)(b)(g)</p> <p>(2) Definitions. As used in this section:</p> <p style="text-align: center;">***</p> <p>(b) "Mutual foreign protection order" means a foreign protection order that includes provisions in favor of both the protected individual seeking enforcement of the order and the respondent.</p> <p style="text-align: center;">***</p>

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	<p>(g) A tribunal of this state may enforce provisions of a mutual foreign protection order which favor a respondent only if:</p> <ul style="list-style-type: none"> (i) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and (ii) The tribunal of the issuing state made specific findings in favor of the respondent.
ILLINOIS	<p style="text-align: center;">750 Ill. Comp. Stat. 60/215</p> <p>Mutual orders of protection are prohibited. Correlative separate orders of protection undermine the purposes of this Act and are prohibited unless both parties have properly filed written pleadings, proved past abuse by the other party, given prior written notice to the other party unless excused under Section 217 [750 ILCS 60/217], satisfied all prerequisites for the type of order and each remedy granted, and otherwise complied with this Act. In these cases, the court shall hear relevant evidence, make findings, and issue separate orders in accordance with Sections 214 and 221 [750 ILCS 60/214 and 750 ILCS 60/221]. The fact that correlative separate orders are issued shall not be a sufficient basis to deny any remedy to petitioner or to prove that the parties are equally at fault or equally endangered.</p> <p style="text-align: center;">725 ILCS 5/112A-15</p> <p>Mutual orders of protection are prohibited. Correlative separate orders of protection undermine the purposes of this Article and are prohibited. Nothing in this Section prohibits a victim from seeking a civil order of protection.</p>
INDIANA	<p style="text-align: center;">Ind. Code. § 34-26-5-14</p> <ul style="list-style-type: none"> (a) A court may not grant a mutual order for protection to opposing parties. (b) If both parties allege injury, the parties shall do so by separate petitions. The trial court shall review each petition separately in an individual or a consolidated hearing and grant or deny each petition on the petition's individual merits. If the trial court finds cause to grant both petitions, the court shall do so by separate orders with specific findings justifying the issuance of each order. <p style="text-align: center;">Ind. Code § 34-26-5-17(d)</p> <p>(d) A mutual foreign protection order is not entitled to full faith and credit if the order is issued by a state or tribal court against a person who has petitioned, filed a complaint, or otherwise filed a written pleading for protection against a family or household member, unless:</p> <ul style="list-style-type: none"> (1) a separate petition or motion was filed by a respondent; (2) the issuing court has reviewed each motion separately and granted or denied each on its individual merits; and (3) separate orders were issued and the issuing court made specific findings that each party was entitled to an order.
IOWA	<p style="text-align: center;">Iowa Code § 236.20</p> <p>A court in an action under this chapter shall not issue mutual protective orders against the victim and the abuser unless both file a petition requesting a protective order.</p>

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KANSAS	<p style="text-align: center;">Kan. Stat. Ann. § 60-3107(b)</p> <p>(b) No protection from abuse order shall be entered against the plaintiff unless:</p> <ol style="list-style-type: none"> (1) The defendant properly files a written cross or counter petition seeking such a protection order; (2) The plaintiff had reasonable notice of the written cross or counter petition by personal service as provided in subsection (d) of K.S.A. 60-3104, and amendments thereto; and (3) The issuing court made specific findings of abuse against both the plaintiff and the defendant and determined that both parties acted primarily as aggressors and neither party acted primarily in self-defense. <p style="text-align: center;">Kan. Stat. Ann. § 60-31b03(g)</p> <p>(g) A court of this state may enforce provisions of a mutual foreign protection order which favor a respondent only if:</p> <ol style="list-style-type: none"> (1) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and (2) the tribunal of the issuing state made specific findings in favor of the respondent.
KENTUCKY	<p style="text-align: center;">Ky. Rev. Stat. Ann. § 403.745(4)</p> <p>(4) Mutual orders of protection may be issued only if:</p> <ol style="list-style-type: none"> (a) Separate petitions have been filed by both parties; and (b) The orders are written with sufficient specificity to allow any peace officer to identify which party has violated the order. <p style="text-align: center;">Ky. Rev. Stat. Ann. § 403.7521</p> <p>(1) All foreign protective orders shall have the rebuttable presumption of validity. The validity of a foreign protective order shall only be determined by a court of competent jurisdiction. Until a foreign protective order is declared to be invalid by a court of competent jurisdiction, it shall be given full faith and credit by all peace officers and courts in the Commonwealth.</p> <p>(2) All peace officers shall treat a foreign protective order as a legal document valid in Kentucky, and shall make arrests for a violation thereof in the same manner as for a violation of an order of protection issued in Kentucky.</p>
LOUISIANA	<p style="text-align: center;">La. Child. Code Ann. art. 1570(I)</p> <p>(I) A court shall not grant a mutual order for protection to opposing parties. However, nothing contained in this Paragraph shall be construed to prohibit the court from granting a protective order to a party in a subsequently filed Petition for Domestic Abuse Assistance provided that the provisions contained in R.S. 46:2136(B) have been met.</p>

STATE	Statutory Language on Whether a Court May Enter Mutual Protection Order Provisions and/or Enforcement of Mutual Protection Order
MAINE	<p align="center">Me. Rev. Stat. Ann. tit. 19-A, §4002(6)</p> <p>Definitions: “Mutual order of protection or restraint” means an order that is granted to the defendant in an action under this chapter or the inclusion of language in an order granted to the plaintiff in an action under this chapter that restricts or limits the plaintiff’s conduct with regard to the defendant absent the filing of a separate complaint by the defendant, service of the complaint and summons upon the plaintiff and a finding by the court that the plaintiff committed the abuse alleged in the complaint.</p> <p align="center">Me. Rev. Stat. Ann. tit. 19-A, §4007(7)</p> <p>(7) Mutual order of protection or restraint. The court may not issue a mutual order of protection or restraint.</p>
MARYLAND	<p align="center">Md. Code Ann., Fam. Law §4-506(c)(3)</p> <p>(i) Subject to the provisions of subparagraph (ii) of this paragraph, in cases where both parties file a petition under § 4-504 of this subtitle, the judge may issue mutual protective orders if the judge finds by a preponderance of the evidence that mutual abuse has occurred.</p> <p>(ii) The judge may issue mutual final protective orders only if the judge makes a detailed finding of fact that:</p> <ol style="list-style-type: none"> 1. both parties acted primarily as aggressors; and 2. neither party acted primarily in self-defense.
MASSACHUSETTS	<p align="center">Mass. Ann. Laws ch. 209A §3</p> <p>A court may issue a mutual restraining order or mutual no-contact order pursuant to any abuse prevention action only if the court has made specific written findings of fact. The court shall then provide a detailed order, sufficiently specific to apprise any law officer as to which party has violated the order, if the parties are in or appear to be in violation of the order.</p>
MICHIGAN	<p align="center">Mich. Comp. Laws Ann. § 600.2950a(8)</p> <p>(8) A court shall not issue a mutual personal protection order. Correlative separate personal protection orders are prohibited unless both parties have properly petitioned the court under subsection (1) or (2).</p>
MINNESOTA	<p align="center">Minn. Stat. § 518B.01, subd. 19a(e)</p> <p>(e) A valid foreign protective order has the same effect and shall be enforced in the same manner as an order for protection issued in this state whether or not filed with a court administrator or otherwise entered in the state order for protection database.</p> <p>(f) A foreign protective order is presumed valid if it meets all of the following:</p> <ol style="list-style-type: none"> (1) the order states the name of the protected individual and the individual against whom enforcement is sought; (2) the order has not expired; (3) the order was issued by a court or tribunal that had jurisdiction over the parties and subject matter under the law of the foreign jurisdiction; and

STATE	Statutory Language on Whether a Court May Enter Mutual Protection Order Provisions and/or Enforcement of Mutual Protection Order
	(4) the order was issued in accordance with the respondent's due process rights, either after the respondent was provided with reasonable notice and an opportunity to be heard before the court or tribunal that issued the order, or in the case of an ex parte order, the respondent was granted notice and an opportunity to be heard within a reasonable time after the order was issued.
MISSISSIPPI	<p data-bbox="1031 370 1373 396">Miss. Code Ann. § 93-21-15(3)</p> <p data-bbox="415 438 1944 597">(3) Every domestic abuse protection order issued pursuant to this section shall set forth the reasons for its issuance, shall contain specific findings of fact regarding the existence of abuse, shall be specific in its terms and shall describe in reasonable detail the act or acts to be prohibited. No mutual protection order shall be issued unless that order is supported by an independent petition by each party requesting relief pursuant to this chapter, and the order contains specific findings of fact regarding the existence of abuse by each party as principal aggressor, and a finding that neither party acted in self-defense.</p> <p data-bbox="1037 662 1367 688">Miss. Code Ann. § 93-22-5(7)</p> <p data-bbox="415 724 1770 815">(7) A tribunal of this state may enforce the provisions of a mutual foreign protection order which favor a respondent only if: (a) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and (b) The tribunal of the issuing state made specific findings in favor of the respondent.</p>
MISSOURI	<p data-bbox="1045 857 1358 883">Mo. Rev. Stat. § 455.050(2)</p> <p data-bbox="415 922 1940 984">2. Mutual orders of protection are prohibited unless both parties have properly filed written petitions and proper service has been made in accordance with sections 455.010 to 455.085.</p> <p data-bbox="1045 1023 1358 1049">Mo. Rev. Stat. § 455.067(1)</p> <p data-bbox="415 1088 1982 1182">1. Any order of protection issued by any other state, tribe, territory or possession of the United States, the Commonwealth of Puerto Rico, or the District of Columbia shall be given full faith and credit throughout the state in all courts, and by all law enforcement officials and agencies, and all public officials and shall be enforceable in the same manner as any order of protection issued by a court in this state.</p>
MONTANA	<p data-bbox="1022 1226 1381 1252">Mont. Code Ann. §40-15-202(3)</p> <p data-bbox="415 1291 1927 1352">(3) The order of protection may not be made mutually effective by the court. The respondent may obtain an order of protection from the petitioner only by filing an application for an order of protection and following the procedure described in this chapter.</p> <p data-bbox="1022 1391 1381 1417">Mont. Code Ann. § 40-15-403(8)</p>

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	<p>(8) A court of this state may enforce provisions of a mutual foreign protection order that favor a respondent only if:</p> <ul style="list-style-type: none"> (a) the respondent filed a written pleading seeking a protection order from the court of the issuing state; and (b) the court of the issuing state made specific findings in favor of the respondent.
NEBRASKA	<p style="text-align: center;">Neb. Rev. Stat. Ann. §42-924.03</p> <p>A court shall only grant a respondent a protection order if (1) the respondent files a cross or counter petition seeking a protection order and (2) the issuing court makes specific findings of domestic or family abuse against the respondent and determines that the respondent is entitled to a protection order.</p> <p style="text-align: center;">Neb. Rev. Stat. Ann. § 42-934(g)</p> <p>(g) A tribunal of this state may enforce provisions of a mutual foreign protection order which favor a respondent only if:</p> <ul style="list-style-type: none"> (1) the respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and (2) the tribunal of the issuing state made specific findings in favor of the respondent.
NEVADA	<p style="text-align: center;">Nev. Rev. Stat. Ann. §33.085(2)</p> <p>2. If the order for protection against domestic violence issued by the court of another state, territory or Indian tribe is a mutual order for protection against domestic violence and:</p> <ul style="list-style-type: none"> (a) No counter or cross-petition or other pleading was filed by the adverse party; or (b) A counter or cross-petition or other pleading was filed and the court did not make a specific finding of domestic violence by both parties, the court shall refuse to enforce the order against the applicant and may determine whether to issue its own temporary or extended order. <p style="text-align: center;">Nev. Rev. Stat. Ann. § 33.146(6)</p> <p>6. If the Canadian domestic-violence protection order is a mutual order for protection against domestic violence and:</p> <ul style="list-style-type: none"> (a) No counter or cross-petition or other pleading was filed by the adverse party; or (b) A counter or cross-petition or other pleading was filed and the court did not make a specific finding of domestic violence by both parties, the court shall refuse to enforce the order against the protected person and may determine whether to issue its own temporary or extended order.
NEW HAMPSHIRE	<p style="text-align: center;">N.H. Rev. Stat. Ann. § 173-B:5(V)</p>

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	<p>(a) Mutual orders for relief shall not be granted. A foreign mutual order for relief shall only be granted full faith and credit in New Hampshire if it meets the requirements set out in RSA 173-B:13, VII.</p> <p>(b) Cross orders for relief may be granted only if:</p> <p>(1) The court has made specific findings that each party has committed abuse against the other; and</p> <p>(2) The court cannot determine who is the primary physical aggressor.</p> <p style="text-align: center;">N.H. Rev. Stat. Ann. § 173-B:13, VII</p> <p>VII. A mutual protective order issued by any other state, tribal, or territorial court against one who has petitioned, filed a complaint, or otherwise filed a written pleading for protection relating to domestic or family violence shall be accorded full faith and credit only if:</p> <p>(a) A cross or counter petition, complaint, or other written pleading was filed seeking such protection order; and</p> <p>(b) The court made specific findings of domestic or family violence by both parties and that each party was entitled to such order.</p>
NEW JERSEY	Statute is silent.
NEW MEXICO	<p style="text-align: center;">N.M. Stat. Ann. §40-13-5(E)</p> <p>A mutual order of protection shall be issued only in cases where both parties have petitioned the court and the court makes detailed findings of fact indicating that both parties acted primarily as aggressors and that neither party acted primarily in self-defense.</p> <p style="text-align: center;">N.M. Stat. Ann. § 40-13A-3(G)</p> <p>G. A New Mexico tribunal may enforce provisions of a mutual foreign protection order only if:</p> <p>(1) both parties filed a written pleading seeking a protection order from the tribunal of the issuing state; and</p> <p>(2) the tribunal of the issuing state made specific findings that each party was entitled to a protection order.</p>
NEW YORK	<p style="text-align: center;">N.Y. Fam. Ct. Act §154-b(1)</p> <p>(1) In every proceeding under articles four, five, six and eight of this act in which an order of protection is requested, the respondent may file with the court an answer to the petition and a counter-claim. A counter-claim shall be heard in the same manner as a petition and may be heard on the return date of the petition, provided that the counter-claim is served on the petitioner no later than five days prior to the return date and said counter-claim and proof of service is filed with the court. The petitioner may file and serve a reply to the counter-claim. A denial of the allegations of the counter-claim shall be presumed if the petitioner does not file and serve a reply.</p> <p style="text-align: center;">NY Fam. Ct Act § 154-e(1)(c)</p>

STATE	Statutory Language on Whether a Court May Enter Mutual Protection Order Provisions and/or Enforcement of Mutual Protection Order
	<p>[I]n the case of orders of protection or temporary orders of protection issued against both a petitioner and respondent, the order or portion thereof sought to be enforced was supported by: (i) a pleading requesting such order, including, but not limited to, a petition, cross-petition or counterclaim; and (ii) a judicial finding that the requesting party is entitled to the issuance of the order which may result from a judicial finding of fact, judicial acceptance of an admission by the party against whom the order was issued or judicial finding that the party against whom the order was issued had given knowing, intelligent and voluntary consent to its issuance.</p>
NORTH CAROLINA	<p>N.C. Gen. Stat. §50B-3(b) (effective December 1, 2022)</p> <p>(b) Protective orders entered pursuant to this Chapter shall be for a fixed period of time not to exceed one year. The court may renew a protective order for a fixed period of time not to exceed two years, including an order that previously has been renewed, upon a motion by the aggrieved party filed before the expiration of the current order; provided, however, that a temporary award of custody entered as part of a protective order may not be renewed to extend a temporary award of custody beyond the maximum one-year period. The court may renew a protective order for good cause. If the hearing for a motion to renew a protective order is set on a date after which the current order will have expired, the court may temporarily renew the current order upon the ex parte application of the plaintiff for a fixed period of time not to extend beyond the date of the renewal hearing or 30 days from the date the current order is set to expire, whichever occurs first, absent the express written consent of both parties or their attorneys. This temporary renewal may not extend a temporary award of custody entered as part of a protective order beyond the maximum one-year period. If a temporary renewal is granted, and the defendant is not personally present in court, the order shall be served on the defendant in the same manner as an ex parte order issued pursuant to G.S. 50B-2. If a temporary renewal is granted, the Clerk shall provide a copy to the sheriff. The commission of an act as defined in G.S. 50B-1(a) by the defendant after entry of the current order is not required for an order to be renewed.</p> <p>Protective orders entered, including consent orders, shall not be mutual in nature except where both parties file a claim and the court makes detailed findings of fact indicating that both parties acted as aggressors, that neither party acted primarily in self-defense, and that the right of each party to due process is preserved.</p> <p>Protective orders entered pursuant to this Chapter expire at 11:59 P.M. on the indicated expiration date, unless specifically stated otherwise in the order.”</p>
NORTH DAKOTA	<p>N.D. Cent. Code §14-07.1-02(5)</p> <p>5. A court of competent jurisdiction may issue a dual protection order restricting both parties involved in a domestic violence dispute if each party has commenced an action pursuant to subsection 1 and the court, after a hearing, has made specific written findings of fact that both parties committed acts of domestic violence and that neither party acted in self-defense. The order must clearly define the responsibilities and restrictions placed upon each party so that a law enforcement officer may readily determine which party has violated the order if a violation is alleged to have occurred.</p> <p>N.D. Cent. Code §14-07.4-02(6)</p>

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	<p>6. A tribunal of this state may enforce the provisions of a mutual foreign protection order which favor a respondent only if:</p> <ul style="list-style-type: none"> a. The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and b. The tribunal of the issuing state made specific findings in favor of the respondent.
NORTHERN MARIANA ISLANDS	<p style="text-align: center;">N.M.I.C Code § 1920</p> <p>A court may grant mutual orders for protection to opposing parties where the court deems it in the best interest of the parties.</p>
OHIO	<p style="text-align: center;">Ohio Rev. Code Ann. §3113.31(E)(4)</p> <p>(4) A court may not issue a protection order that requires a petitioner to do or to refrain from doing an act that the court may require a respondent to do or to refrain from doing under division (E)(1)(a), (b), (c), (d), (e), (g), or (h) of this section unless all of the following apply:</p> <ul style="list-style-type: none"> (a) The respondent files a separate petition for a protection order in accordance with this section. (b) The petitioner is served notice of the respondent's petition at least forty-eight hours before the court holds a hearing with respect to the respondent's petition, or the petitioner waives the right to receive this notice. (c) If the petitioner has requested an ex parte order pursuant to division (D) of this section, the court does not delay any hearing required by that division beyond the time specified in that division in order to consolidate the hearing with a hearing on the petition filed by the respondent. (d) After a full hearing at which the respondent presents evidence in support of the request for a protection order and the petitioner is afforded an opportunity to defend against that evidence, the court determines that the petitioner has committed an act of domestic violence or has violated a temporary protection order issued pursuant to section 2919.26 of the Revised Code, that both the petitioner and the respondent acted primarily as aggressors, and that neither the petitioner nor the respondent acted primarily in self-defense.
OKLAHOMA	<p style="text-align: center;">Okl. Stat. tit. 22, §60.4(K)</p> <p>1. A court shall not issue any mutual protective orders.</p> <p>2. If both parties allege domestic abuse by the other party, the parties shall do so by separate petitions. The court shall review each petition separately in an individual or a consolidated hearing and grant or deny each petition on its individual merits. If the court finds cause to grant both motions, the court shall do so by separate orders and with specific findings justifying the issuance of each order.</p> <p>3. The court may only consolidate a hearing if:</p> <ul style="list-style-type: none"> (a) The court makes specific findings that: <ul style="list-style-type: none"> (1) sufficient evidence exists of domestic abuse, stalking, harassment or rape against each party, and

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	<p>(2) each party acted primarily as aggressors, and (b) the defendant filed a petition with the court for a protective order no less than three (3) days, not including weekends or holidays, prior to the first scheduled full hearing on the petition filed by the plaintiff, and (c) the defendant had no less than forty-eight (48) hours of notice prior to the full hearing on the petition filed by the plaintiff.</p> <p style="text-align: center;">Okla. Stat. tit. 22, §60.23(G)</p> <p>G. A tribunal of this state may enforce provisions of a mutual foreign protection order which favor a respondent only if: 1. The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and 2. The tribunal of the issuing state made specific findings in favor of the respondent.</p>
OREGON	Statute is silent.
PENNSYLVANIA	<p style="text-align: center;">23 Pa. C.S. § 6108 (c)</p> <p>(c) Mutual orders of protection.--Mutual orders of protection shall not be awarded unless both parties have filed timely written petitions, complied with service requirements under section 6106 (relating to commencement of proceedings) and are eligible for protection under this chapter. The court shall make separate findings and, where issuing orders on behalf of both petitioners, enter separate orders.</p>
PUERTO RICO	<p style="text-align: center;">8 L.P.R.A. § 621a</p> <p>Prohibition against the [issuance of] mutual restraining orders The court shall not issue mutual restraining orders to the parties, unless each of the parties: (a) Has filed an independent petition requesting a protection order against the other party; (b) has been notified of the petition filed by the other party; (c) proves in an evidentiary hearing that the other party incurred conduct which constitutes domestic violence, and (d) proves that the domestic violence did not occur within a self-defense context.</p>
RHODE ISLAND	<p style="text-align: center;">R.I. Gen. Laws Ann. § 15-15.1-2</p> <p>Definitions: (4) “Mutual foreign protection order” means a foreign protection order that includes provisions in favor of both the protected individual seeking enforcement of the order and the respondent.</p> <p style="text-align: center;">R.I. Gen. Laws Ann. § 15-15.1-3</p> <p>(g) The court may enforce provisions of a mutual foreign protection order which favor a respondent only if: (1) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and (2) The tribunal of the issuing state made specific findings in favor of the respondent.</p>

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SOUTH CAROLINA	<p style="text-align: center;">S.C. Code Ann. § 20-4-60(E)</p> <p>E. No mutual order of protection may be granted unless the court sets forth findings of fact necessitating the mutual order or unless both parties consent to a mutual order.</p> <p style="text-align: center;">S.C. Code Ann. § 20-4-60(F)</p> <p>(F) If mutual orders of protection have been entered that do not comply with the provisions of this section a petitioner may request the order be vacated and all records of the order be destroyed.</p> <p style="text-align: center;">S.C. Code Ann. § 20-4-330(G)</p> <p>(G) A tribunal of this State may enforce provisions of a mutual foreign protection order which favor a respondent only if:</p> <ol style="list-style-type: none"> (1) the respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and (2) the tribunal of the issuing state made specific findings in favor of the respondent.
SOUTH DAKOTA	<p style="text-align: center;">S.D. Codified Laws § 25-10-5.2</p> <p>No court may, pursuant to the provisions of § 25-10-5, issue a mutual order enjoining both petitioner and respondent from committing acts of domestic abuse unless:</p> <ol style="list-style-type: none"> (1) Both the petitioner and the respondent personally appear; (2) The respondent alleges, under oath, the existence of domestic abuse by stating the specific facts and circumstances of the domestic abuse; (3) The court finds, by a preponderance of the evidence, that domestic abuse has taken place. <p style="text-align: center;">S.D. Codified Laws § 25-10-12.1(5)</p> <p>(5) If the order also provides protection for the respondent, a petition, application, or other written pleading was filed with the issuing court seeking such an order and the issuing court made specific findings that the respondent was entitled to the order;</p>
TENNESSEE	<p style="text-align: center;">Tenn. Code Ann. § 36-3-622(d)</p> <p>(d) A protection order entered against both the petitioner and respondent shall not be enforceable against the petitioner in a foreign jurisdiction unless:</p> <ol style="list-style-type: none"> (1) The respondent filed a cross- or counter-petition, or a complaint or other written pleading was filed seeking such a protection order; and (2) The issuing court made specific findings of domestic or family violence against the petitioner.

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TEXAS	<p style="text-align: center;">Tex. Fam Code § 85.003</p> <p>(a) A court that renders separate protective orders that apply to both parties and require both parties to do or refrain from doing acts under Section 85.022 shall render two distinct and separate protective orders in two separate documents that reflect the appropriate conditions for each party.</p> <p>(b) A court that renders protective orders that apply to both parties and require both parties to do or refrain from doing acts under Section 85.022 shall render the protective orders in two separate documents. The court shall provide one of the documents to the applicant and the other document to the respondent.</p> <p>(c) A court may not render one protective order under Section 85.022 that applies to both parties.</p> <p style="text-align: center;">Tex. Fam. Code § 88.003(g)</p> <p>(g) A tribunal of this state may enforce the provisions of a mutual foreign protective order that favor a respondent only if:</p> <p>(1) the respondent filed a written pleading seeking a protective order from the tribunal of the issuing state; and</p> <p>(2) the tribunal of the issuing state made specific findings in favor of the respondent.</p>
UTAH	<p style="text-align: center;">Utah Code Ann. § 78B-7-108</p> <p>(1) A court may not grant a mutual order or mutual orders for protection to opposing parties, unless each party:</p> <p>(a) files an independent petition against the other for a protective order, and both petitions are served;</p> <p>(b) makes a showing at a due process protective order hearing of abuse or domestic violence committed by the other party; and</p> <p>(c) demonstrates the abuse or domestic violence did not occur in self-defense.</p> <p>(2) If the court issues mutual protective orders, the court shall include specific findings of all elements of Subsection (1) in the court order justifying the entry of the court order.</p> <p style="text-align: center;">Utah Code Ann. § 78B-7-303(7)</p> <p>(7) A tribunal of this state may enforce provisions of a mutual foreign protection order which favor a respondent only if:</p> <p>(a) the respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and</p> <p>(b) the tribunal of the issuing state made specific findings in favor of the respondent.</p>
VERMONT	Statute is silent.
VIRGIN ISLANDS	<p style="text-align: center;">5 V.I.C. § 583(g)</p>

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	(g) A tribunal of this State may enforce provisions of a mutual foreign protection order which favor a respondent only if: (1) the respondent filed a written pleading seeking a protection order from the tribunal of the issuing State; and (2) the tribunal of the issuing State made specific findings in favor of the respondent.
VIRGINIA	Statute is silent.
WASHINGTON	<p style="text-align: center;">Wash. Rev. Code Ann. § 26.51.010</p> <p>The legislature recognizes that individuals who abuse their intimate partners often misuse court proceedings in order to control, harass, intimidate, coerce, and/or impoverish the abused partner. Court proceedings can provide a means for an abuser to exert and reestablish power and control over a domestic violence survivor long after a relationship has ended. The legal system unwittingly becomes another avenue that abusers exploit to cause psychological, emotional, and financial devastation. This misuse of the court system by abusers has been referred to as legal bullying, stalking through the courts, paper abuse, and similar terms. The legislature finds that the term “abusive litigation” is the most common term and that it accurately describes this problem. Abusive litigation against domestic violence survivors arises in a variety of contexts. Family law cases such as dissolutions, legal separations, parenting plan actions or modifications, and protection order proceedings are particularly common forums for abusive litigation. It is also not uncommon for abusers to file civil lawsuits against survivors, such as defamation, tort, or breach of contract claims. Even if a lawsuit is meritless, forcing a survivor to spend time, money, and emotional resources responding to the action provides a means for the abuser to assert power and control over the survivor. The legislature finds that courts have considerable authority to respond to abusive litigation tactics, while upholding litigants’ constitutional rights to access to the courts. Because courts have inherent authority to control the conduct of litigants, they have considerable discretion to fashion creative remedies in order to curb abusive litigation. The legislature intends to provide the courts with an additional tool to curb abusive litigation and to mitigate the harms abusive litigation perpetuates.</p> <p style="text-align: center;">Wash. Rev. Code Ann. § 26.51.020</p> <p>The definitions in this section apply throughout this chapter unless the context clearly requires otherwise.</p> <p>(1) “Abusive litigation” means litigation where the following apply:</p> <p>(a)</p> <p>(i) The opposing parties have a current or former intimate partner relationship;</p> <p>(ii) The party who is filing, initiating, advancing, or continuing the litigation has been found by a court to have committed domestic violence against the other party pursuant to: (A) An order entered under chapter 7.105 RCW or former chapter 26.50 RCW; (B) a parenting plan with restrictions based on RCW 26.09.191(2)(a)(iii); or (C) a restraining order entered under chapter 26.09, 26.26A, or 26.26B RCW, provided that the issuing court made a specific finding that the restraining order was necessary due to domestic violence; and</p> <p>(iii) The litigation is being initiated, advanced, or continued primarily for the purpose of harassing, intimidating, or maintaining contact with the other party; and</p> <p>(b) At least one of the following factors apply:</p>

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	<p>(i) Claims, allegations, and other legal contentions made in the litigation are not warranted by existing law or by a reasonable argument for the extension, modification, or reversal of existing law, or the establishment of new law;</p> <p>(ii) Allegations and other factual contentions made in the litigation are without the existence of evidentiary support; or</p> <p>(iii) An issue or issues that are the basis of the litigation have previously been filed in one or more other courts or jurisdictions and the actions have been litigated and disposed of unfavorably to the party filing, initiating, advancing, or continuing the litigation.</p> <p>(2) “Intimate partner” is defined in RCW 7.105.010.</p> <p>(3) “Litigation” means any kind of legal action or proceeding including, but not limited to: (a) Filing a summons, complaint, demand, or petition; (b) serving a summons, complaint, demand, or petition, regardless of whether it has been filed; (c) filing a motion, notice of court date, note for motion docket, or order to appear; (d) serving a motion, notice of court date, note for motion docket, or order to appear, regardless of whether it has been filed or scheduled; (e) filing a subpoena, subpoena duces tecum, request for interrogatories, request for production, notice of deposition, or other discovery request; or (f) serving a subpoena, subpoena duces tecum, request for interrogatories, request for production, notice of deposition, or other discovery request.</p> <p>(4) “Perpetrator of abusive litigation” means a person who files, initiates, advances, or continues litigation in violation of an order restricting abusive litigation.</p>
WEST VIRGINIA	<p style="text-align: center;">W. Va. Code Ann. § 48-27-507</p> <p>Mutual protective orders are prohibited unless both parties have filed a petition under part 3 [§§ 48-27-301 et seq.] of this article and have proven the allegations of domestic violence by a preponderance of the evidence. This shall not prevent other persons, including the respondent, from filing a separate petition. The court may consolidate two or more petitions if he or she determines that consolidation will further the interest of justice and judicial economy. The court shall enter a separate order for each petition filed: Provided, That nothing in this section shall preclude the court from entering an order restricting contact pursuant to section two-a, article two-a, chapter fifty-one of this code.</p> <p style="text-align: center;">W.Va. Code Ann. § 48-28-3(g)</p> <p>(g) A court of this State may enforce provisions of a mutual foreign protection order which favor a respondent only if:</p> <p>(1) The respondent filed a written pleading seeking a protection order from the tribunal of the issuing state; and</p> <p>(2) The tribunal of the issuing state made specific findings in favor of the respondent.</p>
WISCONSIN	<p style="text-align: center;">Wis. Stat. § 813.12(4)(b)</p> <p>(b) The judge or circuit court commissioner may enter an injunction only against the respondent named in the petition. No injunction may be issued under this subsection under the same case number against the person petitioning for the injunction. The judge or circuit court commissioner may not modify an order restraining the respondent based solely on the request of the respondent.</p> <p style="text-align: center;">Wis. Stat. § 813.128</p>

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	<p>(1g)(b) “Foreign mutual protection order” means a foreign protection order that includes provisions in favor of both the individual seeking enforcement of the order and the respondent.</p> <p>(3g)(h) A tribunal of this state may enforce provisions of a foreign mutual protection order that favor a respondent only if the respondent filed a written pleading seeking a protection order from the tribunal of the issuing state and the tribunal of the issuing state made specific findings in favor of the respondent.</p>
WYOMING	<p style="text-align: center;">Wyo. Stat. Ann. § 35-21-105(h)</p> <p>(h) The court shall not make any provisions of a single order of protection mutually effective. The court may issue a separate order of protection to each party, provided:</p> <p>(i) Each party has filed a separate written petition for an order of protection; and</p> <p>(ii) The court makes specific findings on the record that both parties have committed acts of domestic abuse and that each party is entitled to a separate order of protection.</p>