

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

IN RE: Case No. : 2017-013616 FC 04
2017-013378 FC 04
2017-002826 FC 04

MICHELLE WATTS o/b/o JACOB GANTINE,
Petitioner,
and

MICHAEL J.M. GANTINE,
Respondent.

MOTION FOR COURT TO TAKE TELEPHONIC TESTIMONY AND TO CONTACT THE
ATTORNEYS AND JUDICIAL OFFICERS IN WASHINGTON AND ILLINOIS

The Respondent, Michael J.M. Gantine, by and through undersigned counsel files this his motion and states:

1. The Petitioner, Michelle Watts, exemplifies a litigant that has utilized multiple systems and jurisdictions to forum shop and accomplish obtaining orders for improper purpose, and which are so detrimental to the well being of the minor child, J.R.G, born 5/31/08.

2. The Petitioner, Michelle Watts, has committed fraud upon the courts of the State of Florida, with the assistance of counsel, and their conduct need be sanctioned in the form of denial of the relief sought, sanctions and fees entered and awarded, and that the minor child, now in the Mother's custody be immediately returned to his father, Michael Gantine.

3. In addition to the cases pending in Miami Dade County, referenced in the above style there are additional cases pending as follows: Superior Court of Washington, for King County Case No, 17-2-01981 O KNT (Domestic Violence) and Case No. 17-2-03892 O KNT (Petition for Writ of Habeas Corpus) and 17-3-01263-1 SEA; State of Florida, Circuit Court of Broward County, Family Division Case No. FMCE 09-000250 (41)(91); and State of Illinois, County of

De Page, 18th Judicial Circuit Court , Case No. 09 F 143.

4. The State of Illinois has continuing and exclusive jurisdiction over the parties and the matters as ruled by courts of the State of Illinois, State of Washington, and the County of Broward.

5. The Petitioner/Mother's relief for domestic violence and custody of the child have all been adjudicated recently in both Washington and Illinois, which is why the Mother is seeking relief in Florida.

6. There have been three separate actions in Washington State King County Superior Court involving the child. A writ of habeas corpus action (cause number 17-2-03892-0); a domestic violence protection order DVPO action (cause number 17-2-01981-0); and a parenting plan modification action (cause number 17-3-01263-1).

7. An Attorney/ Guardian Ad Litem was appointed for the child in December, 2014 in the Illinois matter.

8. This Court should allow the testimony of any or all of the out of state attorneys and judicial officers via telephone, and/or contact them in order to obtain the important information as to the status of those matters and the prior adjudications related thereto.

9. The Respondent has retained undersigned counsel to represent him in pending cases in this jurisdiction. He has agreed to pay a reasonable fee for those services. The Mother should be responsible for payment of all fees and costs incurred by the Father. Sanctions should be entered against the Mother and her counsel for their intentional misrepresentation and fraud upon the Court.

Wherefore, the Respondent respectfully requests this Court grant the relief sought, award attorneys fees and costs, enter sanctions, and for such further relief as is just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was eserved and mailed this 8th day of June, 2017 to Michelle Watts 17701 SE 108th Ave., Renton, WA 98055, email: Michelle.02912@gmail.com.

CYNTHIA J. DIENSTAG, PA
Museum Tower, Suite 2710
150 W. Flagler Street
Miami, Florida 33130
Telephone: 305-250-4680
Email: cjdpa1@aol.com

By: /s/ Cynthia J. Dienstag
CYNTHIA J. DIENSTAG, ESQ
FBN 813583