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5 **Superior Court of Washington**
6 **County of King**

7 In re:

8 MICHELLE WATTS,

9 Petitioner,

10 and,

11 MICHAEL GANTINE,

12 Respondent.
13

NO. 17-3-01263-1 SEA

**Memorandum in Response to
Petitioner's Motion for
Reconsideration of 4/7/17 Order on
UCCJEA Jurisdiction Determination**

14 The Respondent, by and through his attorney, Natalie Roberts, respectfully submits this
15 Memorandum in Response to the Petitioner's April 8, 2017 Motion for Reconsideration
16 ("Motion").

17 The petitioner's Motion fundamentally misunderstands both the court's April 7, 2017
18 Order on UCCJEA Jurisdiction Determination and the law surrounding UCCJEA jurisdictional
19 determinations. Because the petitioner's Motion is so devoid of any basis in law or fact to make
20 it a baseless filing, CR 11 sanctions should be issued against the Petitioner and/or her attorney
21 for filing Petitioner's Motion.
22

23 BRIEF FACTUAL BACKGROUND

24 The petitioner filed a Petition for Establishment of a Parenting Plan...and/or Child
25 Support ("Petition for Parenting Plan") in Washington State on March 3, 2017. In her Petition
26 for Parenting Plan, the petitioner requested that this court exercise home state jurisdiction over
27 the parties' child, or temporary emergency jurisdiction. See Petition for Parenting Plan at 4. On
28

1 March 7, 2017, the petitioner filed a Motion for Temporary Orders, requesting, among other
2 things, that this court enter a temporary parenting plan placing the child in petitioner's primary
3 care and enter a temporary restraining order between the respondent and his child. *See Motion*
4 *for Temporary Family Law Order and Restraining Order at 2-3.*

5
6 Prior to filing her Motion for Temporary Orders, on January 30, 2017 the petitioner
7 sought and was granted an ex parte temporary order of protection protecting the respondent from
8 having contact with both the petitioner and her child. *See Petition for Order of Protection in*
9 *Cause No. 17-2-01981-0.* At the return hearing on the petitioner's ex parte order, the court
10 declined to exercise jurisdiction over the child and stayed any portion of the ex parte order which
11 purported to apply to the child. *See Reissuance of Temporary Order for Protection in Cause No.*
12 *17-2-01981-0.* The reissued order was continued to allow the parties to resolve UCCJEA issues.
13
14 *See Id.*

15 Throughout her pleadings with this court the petitioner has either obfuscated or failed to
16 explain several key facts to the court:

- 17 1. There was a valid and enforceable court order out of DuPage County court in Illinois
18 dated February 29, 2016 which placed the child in the father's primary care. *See Ex.*
19 *A, previously filed with this court.*
- 20 2. The petitioner took the child out of DuPage County, contrary to court orders and
21 contrary to Illinois law (*see Decl. of Michelle Watts in Support of Motion for*
22 *Temporary Orders at 8*). Any claim by the mother that she did not know about the
23 Illinois order is a lie. When the Bellevue Police Department found the mother
24 pursuant to the national missing child search for the parties' child, the mother claimed
25 she took the child contrary to the Illinois order because the respondent was "deep in
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1 the mob” and that the respondent’s “mob connections paid off the Illinois Judges and
2 the assigned Guardian Ad Litem.” *See* Sealed Confidential Reports in Cause No. 17-
3 2-01981-0 at 7. The petitioner also lied to the Bellevue Police Department claiming
4 she was in the witness protection program. *Id.*

- 5
- 6 3. The petitioner sought a Domestic Violence Protection Order from this court three
7 days after the Bellevue Police Department found the petitioner and the child on
8 January 27, 2017 at the petitioner’s Bellevue residence, where the petitioner had been
9 illegally concealing the child due to a national missing child’s search. *Petition for*
10 *Order of Protection* in cause no. 17-2-01981-0 KNT. The petitioner failed to tell the
11 court in her January 30, 2017 Petition for a Domestic Violence Protection Order that
12 the child was removed from her care on January 27th pursuant to a missing child
13 investigation from DuPage County Illinois. *Id.*
- 14
- 15 4. The petitioner’s request for a permanent Domestic Violence Protection Order in the
16 DuPage County court proceeding was denied on April 20, 2015 after a full hearing in
17 which both parties were present and presented arguments to the court. *See Ex. B,*
18 *previously filed with the court.*
- 19
- 20 5. The reason that the respondent had no contact with the child for 15 months leading up
21 to the mother’s filing her Petition for a Parenting Plan with this court is because the
22 mother deliberately concealed the child from the respondent and law enforcement
23 through the use a fake name for the child, forged birth certificate for the child, and a
24 fake name for herself. *See* Sealed Confidential Reports in Cause No. 17-2-01981-0.

25
26 This matter is now before the court on the petitioner’s request that this court reconsider
27 its April 7, 2017 Order which dismissed the Petition for Parenting Plan for lack of jurisdiction.
28

1 EVIDENCE RELIED UPON

2 This memorandum is based on the record and file in King County Superior Court cause
3 numbers 17-3-01263-1 SEA, 17-2-01981-0 KNT, and 17-2-03892-0.

4 ARGUMENT

5 The petitioner’s motion for reconsideration comes before this court without any basis in
6 fact and law and should therefore, be denied. Furthermore, because the petitioner’s motion
7 violates CR 11, the respondent should be awarded his reasonable attorney’s fees for defending
8 against a baseless motion.
9

- 10 1. There is no basis to grant reconsideration under CR59(a)(7) because the court properly
11 concluded that Washington State does not have jurisdiction under the UCCJEA.

12 CR 59(a)(7) provides that a court may reconsider its prior decision when “there is no
13 evidence or reasonable inference from the evidence to justify the...decision, or that it is contrary
14 to law.” The petitioner’s argument that CR 59(a)(7) applies to this case because Washington
15 State is the child’s home state and the court therefore misapplied the law by declining to exercise
16 jurisdiction under the UCCJEA is fundamentally flawed in at least a few respects. First, home
17 state jurisdiction does not apply to this matter. Second, even if home state jurisdiction did apply,
18 the petitioner’s unjustifiable conduct nullifies any argument the petitioner has for home state
19 jurisdiction. And third, Illinois was exercising jurisdiction under the UCCJEA when a
20 proceeding was commenced in Washington State and as such, only the Illinois court can decide
21 to give up jurisdiction – the Washington State court cannot wrest jurisdiction from Illinois.
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27 (a) *Home state jurisdiction does not apply to this action.*
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1 Home state jurisdiction applies when a court is making an “initial child custody
2 determination” pursuant to RCW 26.27.201. The UCCJEA further defines “initial
3 determination” to mean “the first child custody determination concerning a particular child.”

4 This court was not making an “initial child custody determination.” There is a valid and
5 enforceable court order from DuPage County Illinois which made a child custody determination.
6 Even prior to the DuPage County Illinois decision there was a valid and enforceable court order
7 from Broward County, Florida. Because there are two prior custody determinations involving
8 the child in this matter, this court cannot be in the position of making an “initial child custody
9 determination.” As such, home state jurisdiction pursuant to RCW 26.27.201 cannot be a basis
10 for this court to obtain jurisdiction over the parties’ child.
11

12
13 *(b) The 15-month period of time during which the petitioner deliberately concealed the*
14 *child from the court, law enforcement, and the respondent should not be a basis for*
15 *home state jurisdiction.*

16 Even if this court could use home state jurisdiction as a basis to obtain jurisdiction, the
17 period of time from November 2015 to February 2017 when the mother deliberately and
18 intentionally hid the child from the Illinois court, law enforcement officials, and the respondent
19 should not be used as a basis for awarding her home state jurisdiction.

20 RCW 26.27.271 provides that:

21 (1) Except as otherwise provided in RCW 26.27.231¹ or by other law of this state, if a
22 court of this state has jurisdiction under this chapter because a person seeking to invoke
23 its jurisdiction has engaged in unjustifiable conduct, the court shall decline to exercise its
24 jurisdiction unless:

25 (a) The parents and all persons acting as parents have acquiesced in the exercise of
26 jurisdiction;

27 (b) A court of the state otherwise having jurisdiction under RCW 26.27.201 through
28 26.27.221 determines that this state is a more appropriate forum under RCW 26.27.261;
or

(c) No court of any other state would have jurisdiction under the criteria specified in
RCW 26.27.201 through 26.27.221.

¹ RCW 26.27.231 addresses temporary emergency jurisdiction which is not at issue here.

1 In this case, none of the three exceptions in RCW 26.27.271(1)(a)-(c) apply.

2 In this case, the petitioner engaged in unjustifiable conduct in taking the child out of
3 Illinois without giving proper notice to the Illinois court; without telling the respondent where
4 she was going; deliberately concealing the child from the court, law enforcement, and the
5 respondent by adopting an alias for herself, adopting an alias for the child, forging a birth
6 certificate for the child; lying to law enforcement when she was finally found pursuant to a
7 national missing child search; and at least obfuscating if not lying to this court regarding the facts
8 surrounding this action.
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11 None of the three exceptions apply to allow the court to exercise jurisdiction despite the
12 petitioner's unjustifiable conduct. The parties do not agree to Washington asserting jurisdiction.
13 This court has not determined it is a more appropriate forum. And, as is explained below, a court
14 of another state, namely Illinois, has jurisdiction under the criteria in RCW 26.27.201 through
15 26.27.221. Thus, even if the petitioner's argument that home state jurisdiction applies to this
16 matter, were correct, which it is not, this court could not exercise home state jurisdiction due to
17 the petitioner's unjustifiable conduct.
18

19 *(c) Illinois has continuing jurisdiction under the UCCJEA.*

20
21 There are several provisions of the UCCJEA which work together to inform courts on
22 how to proceed when a proceeding is commenced in one state when a proceeding was previously
23 commenced in another state. When there are two, simultaneous proceedings, RCW 26.27.251
24 applies. RCW 26.27.251 directs a court who is asked to exercise jurisdiction under the
25 UCCJEA, but learns of an ongoing proceeding in the court of another state that has jurisdiction
26 in substantial conformity with the UCCJEA, to not exercise jurisdiction until the two courts
27 communicate. RCW 26.27.251(1), (2). The court of this state can only take jurisdiction from
28

1 the other court if *the other* court determines that this court is a more appropriate forum. RCW
2 26.27.251(2).

3 The UCCJEA also has a section which determines when a court has exclusive, continuing
4 jurisdiction. This is codified as RCW 26.27.211. However, because RCW 26.27.251 applies to
5 simultaneous proceedings, it appears that RCW 26.27.211 only applies when a proceeding in one
6 state is completed and a new proceeding is commenced.
7

8 In this case, at the time the Washington state action was commenced, the Illinois action
9 was still ongoing because no final order has been entered in that case. As such, RCW 26.27.251
10 applies. There is no argument that Illinois did not have proper jurisdiction in 2012. In fact, the
11 petitioner repeatedly invokes the validity of the Illinois orders as proof of domestic violence, up
12 until April 20, 2015 when she was lost in court and was denied a permanent protection order and
13 ordered to begin reunification efforts for the child with the respondent. Therefore, because
14 Illinois had jurisdiction in substantial conformity with the UCCJEA at the time this action was
15 commenced, this court properly determined that there was a proceeding in the court of another
16 state with jurisdiction.
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19 This court then properly held a conference with the Illinois court on April 7, 2017 (*see*
20 *below* re petitioner's claims that the conference was not proper). And, this court's finding after
21 that conference, namely that Illinois has and is still exercising jurisdiction, that Illinois is the
22 home state, and that Illinois expressly requested to maintain jurisdiction are all proper findings
23 that should not be reconsidered. As explained above, Illinois has jurisdiction by virtue of the
24 petitioner invoking the court's jurisdiction in 2012. The petitioner's decision – made after she
25 did not get rulings in her favor – to take the child and deliberately conceal him from the court,
26 law enforcement, and the respondent does not operate to divest the Illinois court of its proper
27
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1 jurisdiction. The fact remains that there is still an ongoing child custody case in Illinois. And, it
2 does appear that when the petitioner invoked Illinois' jurisdiction over the child in 2012, Illinois
3 was the child's home state. Lastly, as RCW 26.27.251 makes clear, because Illinois is exercising
4 jurisdiction in substantial conformity with the UCCJEA, the only court that can decide to change
5 jurisdiction is Illinois. As the April 7, 2017 order indicates, the Illinois court "expressly
6 reserve[d] and retain[e]d its exclusive and continuing jurisdiction over the minor child." In
7 other words, Illinois stated its' desire to retain jurisdiction and did not find that Washington State
8 is a more appropriate forum.
9

10 It was therefore proper for this court, under RCW 26.27.251(2) to abide by the Illinois
11 court's decision that this court is NOT a more appropriate forum for child custody proceedings,
12 and dismiss the child custody proceeding in this state.
13

14 Because this court properly applied the UCCJEA, RCW 26.27 *et seq.*, to the facts of this
15 case, there is no basis under CR 59(a)(7) for the court to reconsider its April 7, 2017 Order on
16 UCCJEA Jurisdiction Determination.
17

- 18 2. There is no basis to grant reconsideration under CR59(a)(1) because the court properly
19 conducted a UCCJEA conference pursuant to RCW 26.27.251(2).

20 CR 59(a)(1) allows a court to reconsider its decision due to "[i]rregularity in the
21 proceedings of the court...or adverse party, or any order of the court, or abuse of discretion, by
22 which such party was prevented from having a fair trial." Just as her argument that the court
23 misapplied the law is meritless, so too is the petitioner's argument that this court did not properly
24 conduct a UCCJEA conference with the Illinois court devoid of any basis in fact or law.
25

26 The petitioner argues that this court did not conduct a proper conference under RCW
27 26.27.101 because this court (1) did not let the parties participate and (2) did not allow the
28

1 parties to present facts and legal arguments before it made its decision and (3) did not notify the
2 parties of the law. None of these three arguments holds any water.

3 As explained above, when this court earned of an ongoing proceeding in Illinois
4 involving child custody, the court properly commenced communication with the Illinois court
5 under RCW 26.27.251(2). RCW 26.27.101 governs how the communication between courts
6 should be conducted. Specifically, this section states:
7

8 (1) A court of this state may communicate with a court in another state concerning a
9 proceeding arising under this chapter.

10 (2) The court *may allow* the parties to participate in the communication. If the parties are
11 not able to participate in the communication, they must be given the opportunity to
12 present facts and legal arguments before a decision on jurisdiction is made.

13 (3) *Communication between courts on schedules, calendars, court records, and similar
14 matters may occur without informing the parties. A record need not be made of the
15 communication.*

16 (4) Except as otherwise provided in subsection (3) of this section, a record must be made
17 of a communication under this section. The parties must be informed promptly of the
18 communication and granted access to the record.

19 (5) For the purposes of this section, "record" means information that is inscribed on a
20 tangible medium or that is stored in an electronic or other medium and is retrievable in
21 perceivable form (*emphasis added*).

22 A plain reading of the statute against the petitioner's argument indicates the frivolity of the
23 petitioner's arguments.

24 First, the petitioner's claim that this court did not conduct a proper conference because it
25 did not let the parties participate is invalidated by RCW 26.27.101(2) which states only that the
26 court "may allow" the parties to participate in the communication. Furthermore, RCW
27 26.27.101(3) provides that any communication regarding "schedules, calendars, court records,
28 and similar matters may occur without informing the parties." Thus, the court is only directed to
allow the parties to participate in its UCCJEA communication with another court at its discretion
and the court is specifically allowed to keep certain communication out of the purview of the

1 parties. Thus, the petitioner's argument that the court did not properly conduct a UCCJEA
2 conference because it did not allow the parties to participate has no basis in law.

3 Second, the court did not properly conduct a UCCJEA conference because it did not
4 allow the parties to present facts and legal arguments prior to issuing its April 7, 2017 order is
5 not correct. The parties both, and particularly the petitioner submitted extensive pleadings to the
6 court prior to April 7, 2017. The respondent submitted a 17 page (not including attachments)
7 Brief and Declaration to the court on April 3, 2017. The petitioner submitted a "Supplemental
8 Declaration of Michelle Wats in Support of UCCJEA Call" on April 3, 2017. This Supplemental
9 Declaration was four pages long and contained 141 pages of exhibits. This "Supplemental
10 Declaration" was presumably a supplement to the petitioner's initial 12 page declaration which
11 contained over 200 pages of exhibits. Thus, the parties both submitted extensive briefing and
12 declarations to this court prior to the UCCJEA conference on April 7, 2017. The petitioner may
13 be arguing that the parties should be allowed an opportunity to present oral argument prior to the
14 UCCJEA conference. However, the petitioner provides no, and there is no, support for her
15 argument in the law. Because the parties did in fact provide briefing and declarations regarding
16 the facts and each party's legal argument before the court made its April 7, 2017 decision, the
17 petitioner's argument that the court did not allow the parties this opportunity fails.
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21 Lastly, the petitioner's argument that the court has a duty to inform litigants of the law is
22 incorrect. The court is not a legal adviser to a party. The court is the decider. It would in fact,
23 be improper for this court to advise either party as to the law. And in this case, each party was
24 represented by competent, experienced counsel. Furthermore, it is apparent that each party was
25 aware of their ability to provide briefing and declaration to the court before the UCCJEA
26 conference because each party did in fact provide such briefing. There is thus, no basis in fact or
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1 law for the petitioner's claim that the court did not properly conduct a UCCJEA conference
2 because it did not advise the parties of the law.

3 3. There is no basis to grant reconsideration under CR59(a)(2) due to the respondent's
4 alleged misconduct.

5 There is also no basis for this court to reconsider its decision under CR 59(a)(2) which
6 provides that a court can reconsider a decision due to the prevailing party's misconduct. What
7 the petitioner is characterizing as misconduct is actually a factual dispute that she lost and does
8 not agree with. The petitioner's claim that the respondent is "perpetuat[ing] fraud on the court"
9 because "he is a domestic violence perpetrator...yet he fraudulently obtained an order in
10 February of 2016 in Illinois" is an absurd portrayal of the Illinois court decision. On April 20,
11 2015, the parties attended a full, contested hearing regarding the issue of whether a domestic
12 violence protection order ("DVPO") should be granted. The court disagreed with the petitioner
13 and dismissed her DVPO action. The court also ordered reunification counseling to begin for the
14 child and the father. Instead of abiding by the court's ruling, the petitioner took the child and
15 refused to follow the court orders she did not like. She is now, coming before this court, arguing
16 that the factual findings against her in Illinois are fraudulent. There is no basis for the
17 petitioner's claims of fraud. And even if there was a basis for the petitioner's claims, the proper
18 court to argue about the fraudulent nature of the Illinois court proceedings is Illinois, not
19 Washington State. This court cannot second guess the valid order of Illinois. Doing so would
20 violate Article IV, Section 1 of the United States Constitution.²

21
22 Similar to her meritless argument that a factual dispute on which she lost could only be
23 perpetuated through fraud, the petitioner's argument that the respondent should be punished for
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27
28 ² Known as the "Full Faith and Credit Clause" this section provides that "Full Faith and Credit shall be given in each State to the public Acts, Records, and judicial Proceedings of every other State. And the Congress may by general Laws prescribe the Manner in which such Acts, Records and Proceedings shall be proved, and the Effect thereof."

1 the 15-month period of time in which his child was concealed from him is without merit. The
2 reason the respondent did not seek a Writ of Habeas Corpus for almost a year was because he
3 had no idea where the child was. By her own admission, in November 2015 the petitioner took
4 the child to Washington state. She then enrolled the child in school under an alias, used a forged
5 birth certificate, and assumed an alias herself. The respondent commenced a missing child case
6 with the DuPage County Illinois Sheriff department. There were missing child posters of the
7 parties' child distributed in the National Crime Information Center database. And, when the
8 respondent finally did find the child on January 27, 2017, the petitioner was in this court three
9 days later, seeking a DVPO without providing the court the full background of this case. If
10 anyone improperly ripped the child out of one parent's care, it was the petitioner ripping the
11 child out of the respondent's care after his 15-month long search to find the child was finally
12 successful.
13
14

15 The petitioner's claim that the respondent is the party who perpetuated misconduct and
16 that the respondent should be punished for the period of time that the petitioner was hiding the
17 child is simply abhorrent and without merit.
18

19 Because there was no misconduct by the respondent, and in fact, only misconduct on the
20 part of the petitioner, this court should not reconsider its April 7, 2017 Order on UCCJEA
21 Jurisdiction Determination pursuant to CR 59(a)(2).
22

23 4. There is no basis to grant reconsideration under CR59(a)(9).

24 CR 59(a)(9) provides that a court may reconsider its decision when "substantial justice
25 has not been done." However, this provision is not meant to be a "catch-all" provision to justify
26 a party's argument when no other provision of CR 59 applies. It is well settled in this state that
27 courts only "rarely grant reconsideration under CR 59(a)(9) for lack of substantial justice
28

1 because of the other broad grounds afforded under CR 59(a).” *Sligar v. Odell*, 156 Wn. App.
2 720, 734, 233 P.3d 914 (2010).

3 In this case, the petitioner merely restates her arguments for relief under other sections of
4 CR59(a) as a basis for reconsideration under CR 59(a)(9). Because the petitioner provides no
5 new argument, she is attempting to merely use CR 59(a)(9) as a catch-all provision. The
6 petitioner’s attempt to use CR59(a)(9) as a catch all is not proper and should not be adopted by
7 this court. As such, the petitioner’s argument that the court should reconsider its decision under
8 CR59(a)(9) should be denied.

- 10 5. The court should award attorney’s fees to the respondent for having to defend against a
11 motion which was filed in violation of CR 11.

12 CR 11(a) provides, in relevant part, that:

13 The signature of a party or of an attorney constitutes a certificate by the party or attorney
14 that the party or attorney has read the pleading, motion, or legal memorandum, and that to
15 the best of the party's or attorney's knowledge, information, and belief, formed after an
16 inquiry reasonable under the circumstances: (1) it is well grounded in fact; (2) is
17 warranted by existing law or a good faith argument for the extension, modification, or
18 reversal of existing law or the establishment of new law; (3) it is not interposed for any
19 improper purpose...; and (4) the denials of factual contentions are warranted on the
20 evidence or, if specifically so identified, are reasonably based on a lack of information or
21 belief.

22 CR 11(a)(4) further provides that:

23 a pleading, motion, or legal memorandum is signed in violation of this rule, the court,
24 upon motion or upon its own initiative, may impose upon the person who signed it, a
25 represented party, or both, an appropriate sanction, which may include an order to pay to
26 the other party or parties the amount of the reasonable expenses incurred because of the
27 filing of the pleading, motion, or legal memorandum, including a reasonable attorney fee.

28 Thus, CR 11 sanctions apply to “baseless filings” which are filings not supported by the facts or
existing law. *Bryant v. Joseph Tree, Inc.*, 119 Wn.2d 210, 219, 829 P.2d 1099 (1992).

As explained above, none of the arguments the petitioner makes in favor of her Motion
are supported by the facts or the law. In fact, the petitioner’s Motion demonstrates not only a

1 misunderstanding of the court's April 7, 2017 Order but also a fundamental misunderstanding of
2 the UCCJEA. For example, the petitioner argues based on UCCJEA provisions which do not
3 apply to this matter; the petitioner directs this court to wrest jurisdiction from Illinois, which this
4 court cannot do; the petitioner claims that the respondent should be punished for periods of time
5 when the petitioner concealed the child from the court, law enforcement, and the respondent.
6 These are just a few of the more glaring examples of the baseless nature of the petitioner's
7 Motion.
8

9 Because the petitioner's Motion was filed in violation of CR11, the respondent is
10 requesting his attorney's fees for having to defend against this Motion. The respondent is
11 requesting that the petitioner and her counsel be made jointly and severally liable for this
12 attorney's fee award.
13

14 Proof of the respondent's counsel notifying the petitioner's counsel of her intent to seek
15 CR 11 sanctions is attached hereto as *Exhibit C*.

16 Respectfully submitted this 26th day of April, 2017.

17 I certify this memorandum contains 4,194 words, in compliance with Local Civil Rules.
18

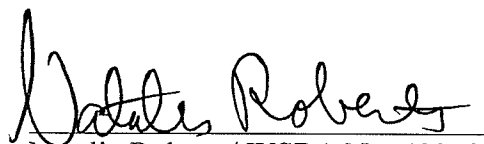
19 
20 Natalie Roberts/ WSBA No. 42250
21 Attorney for Respondent
22
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EXHIBIT A

#25

STATE OF ILLINOIS UNITED STATES OF AMERICA COUNTY OF DU PAGE
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

3805
1017

Parent(s) of:

MICHELLE WATTS
VS

09 - F 143
CASE NUMBER

MICHAEL GANTINE

FILED
2016 FEB 29 PM 2:12
CLERK OF THE
18th JUDICIAL CIRCUIT
DU PAGE COUNTY, ILLINOIS
File Stamp Here

ORDER

Re Order 2/11/16

This cause coming before the Court, the Court being fully advised in the premises, and having jurisdiction of the subject matter, IT IS HEREBY ORDERED; MICHELLE HAVING FAILED TO RESPOND

TO MICHAEL'S PETITION TO MODIFY & NOT APPEARING THIS DATE;

* 1. MICHAEL'S PETITION FOR MODIFICATION OF ALLOCATION OF PARENTAL DECISION MAKING IS GRANTED. MICHAEL GANTINE IS AWARDED PARENTAL RIGHTS OF MEDICAL, PHYSICAL, EDUCATIONAL & EXTRACURRICULAR ACTIVITIES OF J.R.G., AGE 15. Petitioner's right of parenting time is preserved.

* 2. MICHAEL ~~IS~~ AWARDED CUSTODY OF J.R.G FOR PURPOSES OF ALL STATE & FEDERAL STATUTES. ALIEN IS GRANTED TO MICHAEL TO RELOCATE CHILD TO MIAMI FLORIDA.

Name: [Signature] PRO SE

DuPage Attorney Number: 198538

Attorney for: A

Address: 111 E. JEFFERSON

City/State/Zip: NAPERVILLE, IL 60546

Telephone: 630-215-3651

ENTER:

[Signature]

Judge

Date: 2/29/16

EXHIBIT B

A/O

1280

STATE OF ILLINOIS

UNITED STATES OF AMERICA

COUNTY OF DU PAGE

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

1240

MICHELLE WATTS
 vs
 MICHAEL GROSS

09F143
 CASE NUMBER

File Stamp Here

ORDER

This cause coming before the Court; the Court being fully advised in the premises, and having jurisdiction of the subject matter, **IT IS HEREBY ORDERED:**

On Respondent's motion to establish visitation Court finds that immediate re-unification of John Sam would be problematic. Accordingly, the parties shall coordinate retention of a psychologist from Lee, Florida to work toward a reunification of Respondent & the child no later than 4/20/14.

Status on designated of mental health professional is re-terminated per court for 5/20/15 at 9:45 3003 a.m. w/ further notice.

Petitioner's motion to extend plenary order of protection denied for reasons stated in open court.

Name: [Signature] PRO SE
 DuPage Attorney Number: 198538
 Attorney for: [Signature]
 Address: 608 S. W. 1st St #207
 City/State/Zip: Wheaton, IL 60570
 Telephone: 630-215-3651

ENTER: [Signature] Judge
 Date: 4/20/15

EXHIBIT C

Natalie Roberts

From: Monica Chin <mchin@nw-familylaw.com>
Sent: Friday, April 21, 2017 3:41 PM
To: Natalie Roberts
Subject: Re: In re Watts and Gantine Reconsideration

Great Natalie. May God help this child. This is all so wrong, and justice will eventually prevail.

Monica Chin
Attorney at Law
206.467.8000
mchin@nw-familylaw.com

On Apr 21, 2017, at 3:35 PM, Natalie Roberts <nroberts@goldbergjones.com> wrote:

Monica,

I want to put you on notice that we will be seeking CR 11 sanctions against you and your client for your Motion for Reconsideration.

Natalie Roberts
Attorney

<image001.png>

1200 Westlake Ave. N., #700
Seattle, WA 98109
206-448-1010
206 448-0736 (fax)
Visit our Website at www.GoldbergJones-Wa.com

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