

CYNTHIA J. DIENSTAG, P.A.

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June 16, 2017

The Honorable Marcia Caballero
MDC Children's Courthouse
155 NW 3rd Street, Room MDCC 13360
Miami, FL 33128
VIA FAX

Re: **Michelle Watts v. Michael J.M. Gantine**

Case Nos.: **2017-002826 FC 04, 2017-013378 FC 04 and 2017-013616 FC 04**

Your Honor:

There was a hearing before the Honorable Thomas Else in Illinois case number 09 F 143, Michelle Watts v. Michael Gantine this morning. At said hearing, the Court inquired as to why he had not heard for the Miami-Dade County Judge. Therefore, we would very much appreciate it if you would contact the Honorable Judge Else at 630-407-8854. His Judicial Assistant's name is Olga.

There is also a hearing on that case on Monday, so we would very much appreciate it if you contact the Judge today.

In addition attached please find our Motion for Court to take Telephonic Testimony and to Contact the Attorneys and Judicial Officers in Washington and Illinois and a Order Setting Hearing for June 20, 2017 indicating that the GAL for the minor child is unavailable to appear at the hearing in this matter on Tuesday. Therefore we would appreciate you ruling that Mr. Kenny can appear telephonically at the hearing on June 20th.

Thank you for your consideration.

Very truly yours,
/s/ Cynthia J. Dienstag
Cynthis J. Dienstag

cc: Melody Ridgley Fortunato

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.

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By: /s/ Cynthia J. Dienstag
CYNTHIA J. DIENSTAG, ESQ
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THOMAS G. KENNY
tgk@kennylawoffice.com



MICHAEL H. KENNY
mbk@kennylawoffice.com

June 16, 2017

VIA E-MAIL AND FIRST CLASS MAIL

Cynthia J. Dienstag, PA
Museum Tower, Suite 2710
150 W. Flagler Street
Miami, FL 33130

RE: WATTS/GANTINE
Michelle Watts v. Michael Gantine
Case No. 09 F 143

Dear Ms. Dienstag:

As we discussed, I am engaged in a matter in Illinois which is set for hearing on June 20, 2017 at 9:45 a.m. A copy of the order setting the matter for hearing on that day is enclosed. I spoke with opposing counsel in the matter and asked that he agree to a continuance of the matter. He reported that he and his client were unwilling to agree to a continuance.

I could rearrange my schedule for June 21, 2017 and be available to testify in the event the matter does not conclude on June 20, 2017.

Very truly yours,

KENNY & KENNY


Thomas G. Kenny

TGK/mfo
Enclosure

1640

#6

STATE OF ILLINOIS

UNITED STATES OF AMERICA

COUNTY OF DU PAGE

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

IN RE

- MARRIAGE OF
- PARENTAGE OF
- CIVIL UNION OF

Pickard

090774
Case Number

PETITIONER

Pickard

RESPONDENT

FILED
MAY 10 PM 4:15
CLERK OF THE
CIRCUIT COURT OF THE
EIGHTEENTH JUDICIAL CIRCUIT
DU PAGE COUNTY, ILLINOIS
File Stamp Here

Order

This matter having come before the Court, the Court having jurisdiction and being fully advised in the premises,

IT IS HEREBY ORDERED as follows:

- The case is dismissed for want of prosecution. (Code 1790)
- The case is set for Status on _____ at _____ in Courtroom _____ (Code 1640)
- The case is set for Pre-Trial Conference on _____ at _____ in Courtroom _____ (Code 1640)
- The case is set for Prove-Up on _____ at _____ in Courtroom _____ (Code 1640)
- The case is set for Hearing on 6/20/17 at 945 in Courtroom 3002 (Code 1640)

for the following motions/petitions:

PETITION FOR CONTEMPT

- The following date(s) are stricken: _____ (Code 2840)

Name: Kenny & Kenny PRO-SE

DuPage Attorney: 21739

Attorney for: Theri Pickard

Address: 104 E. Roosevelt Rd

City, State, Zip: Wheaton, IL 60187

Phone Number: 630-462-1620

5/10/17
Date
[Signature]
Judge

CHRIS KACHIROUBAS, CLERK OF THE 18TH JUDICIAL CIRCUIT COURT ©
WHEATON, ILLINOIS 60187-0707