Franklin County Ohio Clerk of Courts of the Common Pleas-2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Exhibit B

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT ONE

Per Judgment Entry – Decree of Divorce, Page 3, Motor Vehicles, Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for not transferring the title of her 2009 Dodge Caliber into her individual name. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a first offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 15 7:26 AM - 10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT TWO

Per Judgment Entry – Decree of Divorce, Page 3, Motor Vehicles, Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for not listing her 2009 Dodge Caliber for sale if it was not placed into her individual name by December 31, 2011. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a second offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM - 10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT THREE

Per Judge Browne's verbal order, Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for not providing the Court with Marcus Van Cleave's physical home address. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a third offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OH
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT FOUR

Per Divorce Trial Transcript, Page 71, Lines 4 – 18 and Judgment Entry – Decree of Divorce, Page 18, Records Access Notice, "The parent who is not residential parent, is entitled to access to any record that is related to the child, under the same terms and conditions as the residential parent, and to which said residential parent is legally provided access. Any keeper of a record who knowingly fails to comply with this order is in contempt of court." Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for not providing Plaintiff with notice of Haley A. Catudal's ("Haley") trips to California to see Marcus Van Cleave ("Marcus") or with the physical address of where Haley would be sleeping on said trips. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a fourth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas 2012 Oct 05 7:26 AM 10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OH
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT FIVE

Per Divorce Trial Transcript, Page 71, Lines 4 – 18 and Judgment Entry – Decree of Divorce, Page 18, Records Access Notice, "The parent who is not residential parent, is entitled to access to any record that is related to the child, under the same terms and conditions as the residential parent, and to which said residential parent is legally provided access. Any keeper of a record who knowingly fails to comply with this order is in contempt of court." Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for not providing Plaintiff with notice that Marcus Van Cleave ("Marcus") was involved in Haley A. Catudal's ("Haley") life to the extent that Haley would be left alone with Marcus in situations that would quantify Marcus as Haley's primary care giver. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a fifth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT SIX

Per Divorce Trial Transcript, Page 71, Lines 4 – 18 and Judgment Entry – Decree of Divorce, Page 18, Records Access Notice, "The parent who is not residential parent, is entitled to access to any record that is related to the child, under the same terms and conditions as the residential parent, and to which said residential parent is legally provided access. Any keeper of a record who knowingly fails to comply with this order is in contempt of court." Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for not providing Plaintiff with notice that Marcus Van Cleave ("Marcus") was involved in Haley A. Catudal's ("Haley") life to the extent that Haley was referring to Marcus as "Dad." Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a sixth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM-10DR004934

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT SEVEN

Per Judgment Entry – Decree of Divorce, Plaintiff was granted Local Rule 27 for parents traveling over 90 miles. Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for denying him a Rule 27(5) Two-Week Vacation in 2011. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a seventh offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT EIGHT

Per Judgment Entry – Decree of Divorce, Plaintiff was granted Local Rule 27 for parents traveling over 90 miles. Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for denying him a Rule 27(2) Winter Break in 2011. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for an eighth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT NINE

Per Judgment Entry – Decree of Divorce, Plaintiff was granted Local Rule 27 for parents traveling over 90 miles. Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for denying him a Rule 27(5) Two-Week Vacation in 2012. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a ninth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT TEN

Per Divorce Trial Transcript, Page 71, Lines 4 – 18 and Judgment Entry – Decree of Divorce, Page 18, Records Access Notice, "The parent who is not residential parent, is entitled to access to any record that is related to the child, under the same terms and conditions as the residential parent, and to which said residential parent is legally provided access. Any keeper of a record who knowingly fails to comply with this order is in contempt of court." Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for not providing Plaintiff with notice that Haley A. Catudal was attending Siefert School Age Services. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a tenth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM - 10DR004934

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT ELEVEN

Per Divorce Trial Transcript, Page 71, Lines 4 – 18 and Judgment Entry – Decree of Divorce, Page 18, Records Access Notice, "The parent who is not residential parent, is entitled to access to any record that is related to the child, under the same terms and conditions as the residential parent, and to which said residential parent is legally provided access. Any keeper of a record who knowingly fails to comply with this order is in contempt of court." Defendant has an obligation to keep Plaintiff informed regarding Haley A. Catudal ("Haley"). Plaintiff was not informed that Maria Goncalvez was babysitting Haley. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for an eleventh offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT TWELVE

Per Judgment Entry – Decree of Divorce, Page 18, Records Access Notice, "The parent who is not residential parent, is entitled to access to any record that is related to the child, under the same terms and conditions as the residential parent, and to which said residential parent is legally provided access. Any keeper of a record who knowingly fails to comply with this order is in contempt of court." Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for providing him with fraudulent contact information for Maria Goncalvez, Haley A. Catudal's alleged babysitter. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a twelfth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT THIRTEEN

Per Judgment Entry – Decree of Divorce, Defendant was given the responsibility and obligation to serve Haley A. Catudal's ("Haley") best interest(s). Having a willful and/or reckless disregard for, and/or negligently performing said obligation and duty, should rise to the level of contempt of this Court. Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for leaving Haley unattended for an extended period of time (i.e., one to two hours) every morning for the year preceding Plaintiff's 2012 Summer Break. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a thirteenth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT FOURTEEN

Per Judgment Entry – Decree of Divorce, Defendant was given the responsibility and obligation to serve Haley A. Catudal's ("Haley") best interest(s). Having a willful and/or reckless disregard for, and/or negligently performing said obligation and duty, should rise to the level of contempt of this Court. Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for neglecting Haley's medical needs. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a fourteenth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT FIFTEEN

Per Judgment Entry – Decree of Divorce, Page 18, Relocation Notice, "If the Residential Parent intends to move to a residence other than the residence specified in the Parenting Time Order or Decree of the Court, the Residential Parent shall file a notice of intent to relocate with the Court." Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for not filing a Relocation Notice prior to moving. The Court should note that Defendant moved shortly after Plaintiff filed his Motion for an Emergency Ex Parte Order. Plaintiff filed said Motion after discovering that the contact information for Maria Goncalvez was fraudulent. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a fifteenth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM - 10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT SIXTEEN

Per Divorce Trial Transcript, Page 71, Lines 4 – 18 and Judgment Entry – Decree of Divorce, Page 18, Records Access Notice, "The parent who is not residential parent, is entitled to access to any record that is related to the child, under the same terms and conditions as the residential parent, and to which said residential parent is legally provided access. Any keeper of a record who knowingly fails to comply with this order is in contempt of court." Defendant refused to tell Plaintiff what physical address and State that Haley A. Catudal ("Haley") was in on 7/29/12 at approximately 6:43 PM. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a sixteenth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT SEVENTEEN

Per Judgment Entry – Decree of Divorce, Plaintiff was granted Local Rule 27 for parents traveling over 90 miles. Per Local Rule 27(4)(b), Defendant was obligated to provide Plaintiff with a general itinerary of her Summer Vacation with Haley A. Catudal. Defendant did not comply. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a seventeenth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT EIGHTEEN

Defendant refusal to tell Plaintiff what physical address and State that Haley A. Catudal was in on 7/29/12 at approximately 6:43 PM was not "civil" or "adult" and thus a violation of this Court's order. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for an eighteenth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas - 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT NINETEEN

Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for interference of custody of Haley A. Catudal on July 21, 2012 per Agreed Judgment Entry dated May 18, 2012. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a nineteenth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

Franklin County Ohio Clerk of Courts of the Common Pleas- 2012 Oct 05 7:26 AM-10DR004934

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

vs.

Anna C. Catudal, Defendant
[redacted]
Fort Huachuca, Arizona 85613

Case #: 10DR-12-4934
Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT TWENTY

Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for interference of custody of Haley A. Catudal on July 21, 2012. Defendant is guilty of showing up to Plaintiff's home with two police officers to pick up Haley A. Catudal prior to the agreed upon time. Defendant lied to the police to facilitate their assistance. Defendant did not treat Plaintiff in a "civil" or "adult" manner. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a twentieth offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

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IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
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Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

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PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT TWENTY-ONE

Per Judgment Entry – Decree of Divorce, Plaintiff was granted Local Rule 27 for parents traveling over 90 miles. Per Local Rule 27(7)(b), Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for denying him telephone contact with Haley A. Catudal ("Haley"). Plaintiff's ability to phone Haley was amended on or about July 25, 2012 by the Magistrate (See **Exhibit A**). Defendant has not complied with either order of the Court. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a twenty-first offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff

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IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY
DIVISION OF DOMESTIC RELATIONS

Chance Catudal, Plaintiff
[redacted]
Dublin, Ohio 43017

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[redacted]
Fort Huachuca, Arizona 85613

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Judge Kim A. Browne
Magistrate William Sieloff

PLAINTIFF'S AMENDED MOTION TO HOLD DEFENDANT IN CONTEMPT OF COURT – COUNT TWENTY-TWO

Plaintiff hereby moves the Court for an order holding Defendant in contempt of court for conspiring to subject him to parental alienation from Haley A. Catudal throughout the entire proceedings before the Court. Defendant's willful, wanton, and negligent performance of the duties entrusted to her by Judgment Entry – Decree of Divorce, as well as the later amendments to such, should certainly rise to the level of contempt of court. Plaintiff requests that this Court punish Defendant by imposing the maximum penalty allowed by ORC 2705.05 for a twenty-second offence. Plaintiff further moves the Court for an order requiring Defendant and Defendant's attorney to pay all the expenses incurred by Plaintiff that were caused by Defendant's contumacious conduct, including, but not limited to, costs incurred in brining the within Motion.

Respectfully submitted,

[redacted]
Chance Catudal, Plaintiff

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and accurate copy of the foregoing Motion was served upon all parties or their counsel by Electronic Mail, Regular Mail, Certified Mail, and/or in person on the 5 day of Oct., 2012 in compliance with Civ. R. 5(B).

[redacted]
Chance Catudal, Plaintiff