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By: Deputy Clerk - Carter, Sharon

IN THE DISTRICT COURT OF THE THIRD JUDICIAL DISTRICT OF THE

STATE OF IDAHO, IN AND FOR THE COUNTY OF CANYON

IN RE: ORDER REQUESTING DECLARATION OF MIRSAD HAJRO AS A VEXATIOUS LITIGANT PURSUANT TO IDAHO COURT ADMINISTRATIVE RULE 59,

VS.

MIRSAD HAJRO,

A Vexatious Litigant.

**CASE NO. CV14-21-8001** 

ORDER FINDING VEXATIOUS LITIGANT PURSUANT TO IDAHO COURT ADMINISTRATIVE RULE 59

This matter is before the Administrative District Judge (ADJ) on a referral from the magistrate court pursuant to Idaho Rule of Family Law Procedure 213(c)(5), requesting the ADJ of the Third Judicial District determine whether Mirsad Hajro is a vexatious litigant as defined by Idaho Court Administrative Rule 59(d).

# **PROCEDURAL HISTORY**

On August 27, 2021, the magistrate judge in case CV14-19-1606, pursuant to Idaho Rule of Family Law Procedure 213(c)(5) and Idaho Court Administrative Rule 59(c), referred Mr. Hajro to the ADJ to determine whether Mr. Hajro qualifies as a vexatious litigant for failing to follow

PREFILING ORDER DECLARING VEXATIOUS LITIGANT PURSUANT TO I.C.A.R. 59

1

the appropriate rules when filing multiple motions for contempt despite multiple admonitions not to do so; filing duplications, repetitive, frivolous, or unmeritorious motions; and/or attempting to litigate or relitigate the validity of multiple determinations against him.

# **LEGAL STANDARDS**

"This Court adheres to the rule that persons acting *pro se* are held to the same standards and rules as those represented by attorneys." *In re Prefiling Order Declaring Vexatious Litigant*, 164 Idaho 771, 776, 435 P.3d 1091, 1096 (2019) (quoting *Huff v. Singleton*, 143 Idaho 498, 500, 148 P.3d 1244, 1246 (2006)) (italics in original); *see also Re Khurana*, No. 46652, 2021 WL 2369198, at \*2 (Idaho June 10, 2021).

An administrative judge may declare a person to be a vexatious litigant who habitually, persistently, and without reasonable grounds engages in conduct that . . . serves merely to harass or maliciously injure another party in a civil action; is not warranted under existing law; imposes an unacceptable burden on judicial personnel and resources, or impedes the normal and essential functioning of the judicial process. I.C.A.R. 59(a). To find a person is a vexatious litigant, as is relevant to the present case, the ADJ must find:

- (2) After a litigation has been finally determined against the person, the person has repeatedly relitigated or attempted to relitigate, *pro se*, either:
  - (A) the validity of the determination against the same defendant or defendants as to whom the litigation was finally determined or
  - (B) the cause of action, claim, controversy, or any of the issues of fact or law, determined or concluded by the final determination against the same defendant or defendants as to whom the litigation was finally determined.
- (3) In any litigation while acting pro se, repeatedly files unmeritorious motions, pleadings, or other papers, conducts unnecessary discovery, or engages in other tactics that are frivolous or solely intended to cause unnecessary delay.

I.C.A.R. 59(d). Once declared to be a vexatious litigant, that person will be prohibited from filing any new litigation in the courts of this state *pro se* without first obtaining leave of a judge of the court where the litigation is proposed to be filed. I.C.A.R. 59(c).

Whether or not an individual is a vexatious litigant is a matter of discretion. *In Re Cook*, 481 P.3d 107, 113 (Idaho 2021) (citing *Telford v. Nye*, 154 Idaho 606, 610, 301 P.3d 264, 268 (2013)). When exercising its discretion, the ADJ must (1) perceive the issue as one of discretion; (2) act within the boundaries of that discretion; (3) act consistently with the legal standards applicable to the choices available; and, (4) exercise reason when reaching its decision. *Lunneborg v. My Fun Life*, 163 Idaho 856, 867, 421 P.3d 187, 198 (2018).

#### ANALYSIS AND FINDINGS OF FACT

As a preliminary matter, the ADJ has considered every document contained within the Clerk's Record in case CV14-19-1606 pursuant to Idaho Rule of Evidence 201(c)(1), and makes its findings based on the information contained therein. A list of those documents is attached as Exhibit A.

#### A. Findings of Fact and Conclusions of Law

#### 1. Pre-Divorce Proceedings and Motions by Mirsad Hajro

Jennifer and Mirsad Hajro<sup>1</sup> were married in Caldwell on September 28, 1999. Jennifer

grew up in Idaho, while Mirsad was born in Bosnia. Jennifer and Mirsad have four children, two

of whom are now adults, and two who are still minors. Over the years, the family has lived in many

places other than the Treasure Valley, including San Diego, Bosnia, and Malaysia. From

November of 2017 to September of 2018, the family resided in Malaysia. In September of 2018,

Jennifer and the children returned to Nampa to live with Jennifer's parents while Mirsad stayed in

Malaysia where he was actively involved in missionary work and attempting to establish a

business.

In November of 2018, Jennifer and her three youngest children returned to Malaysia. The

eldest, then an adult, chose to remain in Idaho. Mirsad was upset and thereafter the relationship

between him and Jennifer began to break down. After three days in Malaysia, Jennifer and her

children returned to Idaho, again moving in with her parents. Mirsad returned to Idaho in January

of 2019, and began living in Boise.

Jennifer filed for divorce in February 2019, citing irreconcilable differences. Mirsad

counterclaimed that Jennifer abandoned one of their children in 2018, and that she had been

unemployed since 2001, with Mirsad being the only provider for the family since then. Jennifer

was represented by an attorney throughout the majority of the proceedings; Mirsad was pro se.

Throughout the entire long and contentious divorce proceeding, both pre and post-divorce,

Mirsad filed numerous motions, objections, or other documents; the bulk of which were denied.<sup>2</sup>

<sup>1</sup> Because both parties share the same last name, for ease of reading and understanding, this

document will refer to each by their first name.

<sup>2</sup> Only eight of Mirsad's motions were granted: Motion for Change of Visitation, filed April 15, 2020; motions to shorten time, filed September 1, 2019, January 8, 2020, September 23, 2020, November 15, 2020 (but only as to one of two other motions filed that day), and December 9, 2020; and motions to continue filed August 27, 2019, and August 10, 2020.

PREFILING ORDER DECLARING

One example prior to the conclusion of the trial that began January 13, 2020, is a series of at least

six motions for contempt, plus related amendments, filed between May 28, 2020, and August 27,

2020. The first such motion was denied as premature. The second, which was substantially similar

to the first, was filed on June 26, 2020, amended on July 3, and denied on the record on July 9,

2020, because it failed to comply with the requirements of Rule 75 because it did not contain an

affidavit swearing out the facts upon which the contempt was sought, it simply contained

conclusory allegations without support.

A third motion and affidavit for contempt, also substantially similar to the preceding

motions, was filed on July 10.3 This was amended on July 17, and again on July 23. This amended

filing was accompanied by a contemporaneous motion to sanction Jennifer. These filings asserted

substantially the same claims, with only a few minor additions, and sought substantially the same

relief to the prior motions for contempt. On July 30, the Magistrate Judge once again denied the

motion for contempt for failing to comply with Rule 75 because specific facts delineating the

alleged contempt were not contained in a sworn affidavit as required by the rule. The motion for

sanctions was denied as untimely.

Approximately one hour after the July 30, 2020 hearing, Mirsad filed a fourth motion for

contempt. On August 12, Mirsad filed a fifth motion for contempt that may have been an attempt

to amend the July 30 filing. He also filed an amended motion and affidavit for sanctions. These

motions contained everything in the previously denied motions, but added a number of requested

sanctions. Several of the requested sanctions in all of these motions for contempt involved custody,

visitation, medical decisions, and therapy issues that had previously been specifically addressed

<sup>3</sup> Although it was captioned as an amended motion, there was no pending motion to amend.

by the magistrate judge. Once again, Mirsad's motions failed to contain a sworn affidavit as

required by Rule 75.

On August 27, the magistrate judge denied the pending motions for contempt and

admonished Mirsad that if he filed another motion that failed to comply with Rule 75, he may be

required to pay attorney's fees. Mirsad inquired as to whether he could file a corrected motion, but

the court declined to make any ruling as to that question. The court also determined that the motion

for sanctions could be heard as evidence at the ongoing trial. The motion for sanctions was

ultimately denied.

Approximately one hour after the August 27th hearing, Mirsad filed a sixth motion for

contempt. He amended the new motion on September 8, 2020. The substance of this motion was

significantly different from any of the preceding motions, consisting of only one sentence alleging

willful violation of signed orders and requesting monetary sanctions. Again, despite the previous

admonitions of the court, the new motion for contempt failed to articulate any facts through sworn

affidavit. At the hearing on this new motion, the court found that, as with the previous motions

for contempt, the present motion failed to comply with Rule 75. The court therefore declined to

hear the motion, struck it, awarded fees and costs to Jennifer, and once again admonished Mirsad

about potential additional sanctions if he continued to file non-compliant motions.

Despite these admonitions, on November 15, Mirsad filed additional motions, including a

motion for sanctions and request for a hearing concerning the appointed therapist. These motions

once again repeated the allegations previously asserted. The court declined to rule on the motion

for sanctions, and ordered therapy to continue with the previously ordered therapist. However, the

court indicated it would reconsider appointing a different therapist if Mirsad submitted the name

6

of a different counselor.

PREFILING ORDER DECLARING VEXATIOUS LITIGANT PURSUANT

TO I.C.A.R. 59

Closing arguments in the divorce trial were held on December 17, 2020, and the court took the matter under advisement. Thereafter, on January 13, 2021, Mirsad filed a document entitled "Declaration on Nurah's Alienation and Therapy for it." This document is eighty-seven pages, the first two of which contain allegations against Jennifer; Rita Mortenson, the therapist; and Jennifer's first attorney. The remainder contains, in part, reference material on parental alienation copied from a website, email communications between Mirsad and the court-appointed therapist, numerous documents that appear to be receipts between school and his daughter confirming submission of his daughter's schoolwork, an undated, unaddressed, unsigned generic document purporting to be an amicus brief by someone named Linda Gottlieb, and an unsigned generic declaration from the same.

Then, on February 4, 2021, Mirsad filed a document he titled "Declaration about Jennifer's Continuous Child Abuse thru Alienation, Latest Abduction, her Kidnapping Tendencies, and Response to Petitioner's and Her Attorney Lies Under Oath About Attorney Fees and Odyssey System. Update on Individual Therapy Failure." This document was a continuation of the previous document's allegation of parental alienation and references specific facts surrounding the failure to exchange one of the children because he was late to the appointment, which he asserted constituted parental kidnapping; the use of vulgarity in front of the children, which he characterized as child abuse; inconsistencies or inaccuracies with the attorney's fees documentation, which he asserted was demonization strategies and double dipping through deception as well as child abuse; as well as copies of some of the same information included in the January 13 filing.

As there was no actual motion before it, the court did not address either of these two documents. Instead, after nine days of court trial spread out over the course of eleven months,<sup>4</sup> on February 8, 2021, the magistrate judge issued an order granting Jennifer's petition for divorce. On February 22, the court awarded Jennifer attorney and paralegal fees in the amount of \$319 arising out of the dismissal of Mirsad's August 27, 2020 contempt motion.

# 2. <u>Post-Divorce Proceedings</u>

Subsequent to the entry of judgment, Mirsad began filing multiple documents relating to reconsideration. The initial documents were as follows as follows:

- 1. Motion & Affidavit to Reconsider Fact Finding, Order, Proposed Final Judgment, Order for Attorney Fees Judgment–Filed March 4, 2021;
- 2. Objection to Proposed Order for Final Judgment-Filed March 4, 2021;
- 3. Motion and Affidavit to Amend Findings or Make New-Filed March 05, 2021; and
- 4. Second Motion & Affidavit to Amend Filings of Make New-Filed March 08, 2021.

The Court issued a judgment on March 9, 2021, and heard argument on the above motions on April 1. At the hearing, Jennifer stipulated to amendment of the child support arrearage on one of the children who had reached the age of majority. The court therefore granted Mirsad's motion on that issue but denied the remainder. An amended judgment was issued April 7, 2021. Thereafter, Mirsad filed the following two additional documents in support of reconsideration:

- 1. Objection to Amended Final Judgment–Filed April 14, 2021; and
- 2. Motion and Affidavit to Set Aside Judgment-Filed April 27, 2021.

A motion to reconsider is not, generally in and of itself, problematic; however, given the substance thereof and when considered in the totality of the circumstances, the motion to reconsider and other related filings are repetitive and attempt to relitigate multiple issues that were

<sup>&</sup>lt;sup>4</sup> Day 1 of the court trial was held January 13, 2020; day 2 was held May 26, 2020; day 3 was held June 1, 2020; day 4 was held June 22, 2020; day 5 was held July 20, 2020; day 6 was held September 14, 2020; day 7 was held October 20, 2020; day 8 was held October 26, 2020; and oral closing arguments were held December 17, 2020.

previously decided by the Court. Further, these documents are merely a continuation of Mirsad's practice of filing repetitive, conclusory, and unsupported documents throughout the course of the case in an attempt to relitigate issues.

The last document listed above, the Motion and Affidavit to Set Aside Judgment filed on April 27, 2021, was completely frivolous and without merit and constituted nothing more than an attempt to relitigate issues in violation of I.C.A.R. 59(a)(3). Mirsad claims that this filing contains "new evidences proving Jennifer's dishonesty and lack of credibility and integrity;" however, less than half of the pages of the filing contain new information. Otherwise, it contains only references to filings from 2019 and 2020, and cites to or copies documents and arguments included in the initial reconsideration filings. For example, the screenshots included in pages 29-35 were included in previous filings which had previously been denied by the magistrate court, page 2 contains a description of an incident that occurred on February 18, 2021, which Mirsad discussed on page 6 of the Second Motion and Affidavit to Amend Findings or Make New"; the end of page 24 through page 26 of this filing are virtually identical to pages 3-4 of Mirsad's previously denied "Objection to Amended Final Judgment"; and pages 12-13 are identical to arguments made in pages 2-3 of the "Objection for Proposed Order for Final Judgment."

In addition to the foregoing motions relating to reconsideration, Mirsad filed numerous motions, affidavits, objections, and/or other documents despite rulings and admonitions given by the magistrate court. *See* Exhibit A. As set forth below, these motions are largely repetitious, meritless, and attempts to relitigate issues already addressed. While only the tip of the iceburg, twenty-one of the post-divorce motions and filings bear further discussion because they clearly highlight Mirsad's attempt to relitigate the validity of the magistrate judge's determinations, the divorce itself, or the issues of fact and/or law concluded therein contrary to I.C.A.R. 59(a)(2).

9

Moreover, each of these filings is without merit as contemplated by I.C.A.R. 59(a)(3). For ease of discussion due to the similarity between the filings, the filings have been categorized into groups as set forth below.

# a. Collateral challenges to the judgment

The first set of documents are from August 5, 2021, the day after the Supreme Court denied Mirsad's request to stay and continue his appeal.

- Notice of Deprivation and Trespass upon Rights;
- Notice of Motion Trespass Upon Rights; and
- Notice to Court Objection Trespass Upon Rights.

# i. Notice of Deprivation and Trespass upon Rights

In his "Notice of Deprivation and Trespass Upon Rights," Mirsad alleged, in part, the magistrate court "trespassed" upon his rights by refusing to grant him a trial by jury. In support of these accusations, Mirsad repeatedly and improperly cites to 18 U.S.C. § 242 and to the United States Supreme Court case of *Howlett By & Through Howlett v. Rose*, 496 U.S. 356 (1990).<sup>5</sup> The reliance on federal law and criminal standards that are inapplicable to Idaho family law

<sup>5</sup> Title 18 of the United States Code is the "Crimes and Criminal Procedure" section, which is

on inapplicable Federal Statutes or cases.

inapplicable here because this is a family law action and, with very few exceptions relating to community property which do not apply here, "[t]he whole subject of the domestic relations of husband and wife, parent and child, belongs to the laws of the States and not to the laws of the United States." *Hisquierdo v. Hisquierdo*, 439 U.S. 572, 581 (1979) (*quoting In re Burrus*, 136 U.S. 586, 593–594 (1890)). Additionally, 18 U.S.C. § 242 is a criminal code that does not provide a private right of action. *See*, *e.g.*, *United States v. Philadelphia*, 644 F.2d 187 (3d Cir.1980). Likewise, the proposition he claims *Howlett v. Rose* stands for—that those rights guaranteed by the Federal Constitution are enforceable in state courts—is misguided and inapplicable to the facts of this case. *Howlett v. Rose* specifically held that the Supremacy Clause of the Constitution required state courts to hear §1983 actions despite state law that purportedly provided "a 'valid excuse' for the state court's refusal to entertain federal actions." *Howlett v. Rose*, 496 U.S. at 379. Similarly, the remaining propositions Mirsad states are "facts" on pages two through fourteen likewise rely

proceedings are simply continued attempts to relitigate issues previously decided by the magistrate judge and constitute nothing more than meritless argument.

#### ii. Notice of Motion Trespass Upon Rights

The full title of Mirsad's next filing was: Notice of Motion Trespass Upon Rights Are Committed Inside This Court By Its Staff And The Adjudicator Is Acting Under a Cooperative Agreement Under the Authority of 42 USC Section 654(7), 45 CFR 302.34, and 45 CFR 303.101 And Is Presider Over Expedited Processes Under Authority of 45 CFR 303.101 And These Facts Are Proof The Adjudicator Is Not Impartial And Is Violating the Defendant's Right To Impartial Due Process.

In this motion, Mirsad alleged he has "received notice that he must pay child support, child support arears, and participate in State title IV-D Child Support Enforcement proceedings." (p.1). He claimed that being required to pay past and future child support as ordered by the Magistrate Court is "proof [he] is ordered by this court under duress and not of his own free will," and that the lack of evidence of a loan or promissory note "he cannot be held in default as claimed by this Court." (p.2). To support these claims Mirsad cited to 42 U.S.C. § 654(7), 45 C.F.R. § 302.34, and 45 C.F.R. § 303.101. Title 42 U.S.C. § 654(7) requires that a state child support plan must allow courts and other officials to "assist the agency administering the plan . . . in order to assure optimum results[, and] with respect to any other matters of common concern." Title 45 C.F.R. § 302.34 requires the State to enter into cooperative agreements between "appropriate courts" and other officials, and that those "arrangements shall contain provisions for providing courts and law enforcement officials with pertinent information needed in locating noncustodial parents, establishing paternity and securing support." Finally, 45 C.F.R. § 303.101 requires states to use expedited procedures for child support actions, and outlines safeguards and expected "functions

performed by presiding officers." Mirsad claims that these arrangements are "proof [he] is not receiving impartial due process under [45 C.F.R. § 303.101(c)(2),]" and that the magistrate court is being improperly "used for administrative Title IV-D proceedings." (pp.3-4). The remaining pages, four through nine, are a repeat of the same inapplicable claims and assertions made in pages 10 through 14 of the "Notice of Deprivation of Rights" discussed previously.

This filing lacks any meritorious information or argument, is not based in relevant law, and constitutes nothing more than a frivolous attempt to relitigate issues already determined by the magistrate court.

## iii. Notice to Court Objection Trespass Upon Rights

The final filing that day was titled: Notice to Court Objection Trespass Upon Rights 18 USC § 242 Deprivation of Rights and Notice Of Claim. As previously discussed, there is no private right of action under 18 U.S.C. § 242. *See*, *e.g.*, *United States v. Philadelphia*, 644 F.2d 187 (3d Cir.1980). Mirsad conflates civil pleading issues with criminal law and the Seventh Amendment right to a jury trial in certain civil matters with the magistrate judge's rulings against him in this family law case.

In this document Mirsad states "[he] is claiming 10,000 dollars for each violation or interference with his rights or trespass upon his property, including but not limited his children being his DNA property, and will charge this court 1 dollar per each second until his rights and property are restored," and that those rights are "guaranteed by the US constitution [sic]." (p.7, citing Santosky v. Kramer, 455 U.S. 745 (1982)). This argument is correct as far as it goes. Idaho recognizes that parents have due process rights in proceedings to terminate their parental rights. In re Doe, 156 Idaho 103, 109, 320 P.3d 1262, 1268 (2014) (citing In Interest of Bush, 113 Idaho 873, 875, 749 P.2d 492, 494 (1988)). However, this was not a proceeding to terminate his parental

rights due to neglect, which was the subject of the *Santosky* case he relies upon. Rather, this was a divorce and custody proceeding. Given the vastly different nature of the cases, Mirsad's reliance on *Santosky* is misplaced, unfounded, and misguided. Ultimately, this filing was similar to prior filings and once again constitutes nothing more than a meritless attempt to relitigate issues already determined by the magistrate in violation of I.C.A.R. 59(a)(2) and lacks any meritorious argument.

### b. Documents filed September 2, 2021

The next group of documents include the following filed on September 2, 2021<sup>6</sup>:

- Notice of Objection and Demand for Clarification of Evidence
- Notice of Motion Demanding Response
- Notice of Demand for Dismissal

# i. Notice of Objection and Demand for Clarification of Evidence

On September 2, 2021, Mirsad filed the Notice of Objection and Demand for Clarification of Evidence. This motion repeats Mirsad's arguments concerning alleged violations of the magistrate's duties. Specifically, the same arguments were made in the Notice of Motion Objection Demand Dismissal of All Motions and the Notice of Motion to Dismiss with Prejudice filed August 26, 2021. Both motions were denied. The issues were previously considered and ruled upon by the magistrate as discussed in some detail above, the and no further authority or support was provided in this motion. As such, the objection and demand for clarification is simply a further attempt to relitigate issues contrary to I.C.A.R. 59(a)(2).

#### ii. Notice of Motion Demanding Response

The Notice of Motion Demanding Response is functionally identical to the Notice of Objection and Demand for Clarification of Evidence; however, it also contains an argument

<sup>&</sup>lt;sup>6</sup> Mirsad filed additional documents on September 2<sup>nd</sup>, but they are discussed elsewhere and so will not be repeated here.

regarding the magistrate court's duty to provide evidence of personal jurisdiction "over a living man with blood flowing through his body and a free citizen of the state." Mirsad inexplicably argues that the court cannot issue judgments until it can provide evidence of an agreement under UCC 2-204, and that the state forced him to participate in the proceedings involuntarily, amounting to indentured servitude thereby violating Mirsad's constitutional right to due process. These arguments are frivolous, repetitive to arguments previously presented and denied, and nothing more than an attempt to undermine proceedings.

The continued filing of documents of this nature is contrary to I.C.A.R. 59(3). voluntary appearance of a party or service of any pleading by the party . . . constitutes a voluntary submission to the personal jurisdiction of the court." Dep't of Fin., Sec. Bureau v. Zarinegar, 167 Idaho 611, 621, 474 P.3d 683, 693 (2020), reh'g dismissed (Nov. 5, 2020) (quoting I.R.C.P. 4.1(a)); see also State v. Aguilar, 103 Idaho 578, 580, 651 P.2d 512, 514 (1982) (holding a defendant consents to the court's personal jurisdiction when the defendant fails to "object or raise as an affirmative defense the asserted lack of personal jurisdiction over him as required under I.R.C.P.... 12(h), and participated in the proceeding"). In the Magistrate Court's Findings of Fact, the Magistrate Court detailed how Mirsad had filed an answer and counterclaim to Jennifer's Petition for Divorce along with numerous other filings in this case, thereby subjecting himself to the jurisdiction of the Magistrate Court. In addition, Idaho follows the rule that "the court of any state where the plaintiff is domiciled may issue a divorce decree entitled to full faith and credit in all other states," which means the magistrate court not had both personal jurisdiction and subject matter jurisdiction and was authorized to grant the divorce Jennifer requested. Donaldson v. Donaldson, 111 Idaho 951, 956, 729 P.2d 426, 431 (Ct. App. 1986) (citing Newell v. Newell, 77 Idaho 355, 363, 293 P.2d 663, 668 (1956), overruled on other grounds by Baker v. Baker, 100

Idaho 635, 637, 603 P.2d 590, 592 (1979)); *see also* I.C. § 5-514(e) (conferring jurisdiction on parties who have maintained a "matrimonial domicile" in the State at the time "of any act giving rise to a cause of action for divorce").

It is also notable that this filing, as well as the Objection and Demand for Clarification contain identical arguments to those presented in the Motion for Permissive Appeal filed on June 25, 2021, and denied by the magistrate on July 27, 2021.

# iii. Notice of Demand for Dismissal

Next, in the Notice of Demand for Dismissal, Mirsad argues the magistrate court is required to dismiss this case under Federal Rule of Civil Procedure 12(b)(6) because Jennifer "has failed to prove standing by fail[ing] to introduce clear and convincing evidence proving [she] suffered an injury in fact." Again, as with other motions made and ruled upon, there is no merit to Mirsad's argument because the Federal Rules of Civil Procedure are not controlling in Idaho Courts. *See Kalashnikov v. State*, No. 41413, 2014 WL 4243639, at \*3 (Idaho Ct. App. Aug. 27, 2014) (finding that allegations of violations of the Federal Rules of Civil Procedure are inapplicable in a state court matter). Further, issues of standing and the existence of an injury in fact were ruled upon by the magistrate and/or any such arguments became moot at the conclusion of trial. Again, these arguments are without merit. Further, they are repetitive to arguments presented and previously denied.

#### c. Post-Divorce Motions for Contempt

Following the decree of divorce, and despite repeated warnings from the magistrate concerning the filing of unsupported and unmeritorious contempt motions, Mirsad continued to file motions for contempt. A total of eight such motions were filed. The first post-judgment motion seeking contempt was filed April 15, 2021, and denied on the record on May 6, 2021. Four

more motions were filed on April 25, 2021,<sup>7</sup> and denied on May 20, 2021. The sixth was filed on

August 26, 2021, and the most recent two were filed on September 2, 2021, and denied on

September 13. Despite numerous admonitions from the magistrate throughout the course of

litigation, each of these motions failed to comply with the requirements of Rule 75 by failing to

properly outline or articulate the behavior that was alleged to constitute contempt, and containing

conclusory and unsupported allegations. They were all found to be meritless and frivolous by the

magistrate judge. This Court agrees.

Mirsad filed the first of these multiple motions for contempt a mere one week after the

magistrate court issued the Amended Judgment and Decree of Divorce. The affidavits supporting

these motions were lengthy and more importantly, repetitious. The first affidavit alone was fifty-

nine pages and the affidavits supporting the subsequent four motions contained a total of sixty-

nine pages, at least twenty-nine of which were information that was previously filed in motions

for contempt denied by the magistrate court prior to issuance of the Findings of Fact.<sup>8</sup> These

motions were denied by the magistrate court because they did not comply with the mandatory

requirements of I.R.C.P. 75.

Idaho Rule of Civil Procedure 75(c)(3) requires that a motion for contempt:

<sup>7</sup> The filing date referenced is that of the physical filing stamp on the document rather than the date in the electronic filing system.

16

<sup>&</sup>lt;sup>8</sup> As just a few examples: page 5 of the April 15 affidavit contains an identical screenshot to pages 13-14 of a motion for contempt filed on May 28, 2020; pages 6 and 7 are screenshots of emails found on pages 8 and 9 of a motion for contempt filed June 26, 2020, page 9 contains a screenshot of an email included on page 30 of a motion for contempt filed July 3, 2020; and page 3 of the affidavit in support of the April 25 2<sup>nd</sup> motion is a screenshot also found on page 31 of a motion for contempt filed on July 17, 2020.

...must allege the specific facts constituting the alleged contempt and set forth each instance of alleged contempt separately. The written charge or affidavit need not allege facts showing that the respondent's failure to comply with the court order was willful. If the alleged contempt is the violation of a court order, the written charge or affidavit must also allege that either respondent or the respondent's attorney was served with a copy of the court order or had actual knowledge of it.

I.R.C.P.75(c)(3). Upon review of each of these filings, it is clear that none of the contempt motions as set forth above complied with Civil Rule 75(c)(3) in that they do not contain any specific allegations of fact showing the alleged contempt.

Mirsad was repeatedly informed that any motions for contempt must comply with the rule and he had been previously sanctioned for failure to comply with this requirement. These filings contain no new information, lack merit, and constitute nothing more than repetitious attempts designed to frustrate, obfuscate, and relitigate this this case.

# d. Motions Relating to Appointment of a Parenting Coordinator

Mirsad has made multiple motions concerning appointment of a parenting coordinator, but the following are most notable:

- Objection on Appointment of Parenting Coordinator–filed July 23, 2021;
- Motion and Affidavit Objecting to Proposed Order Appointing Parenting Coordinator-filed August 13, 2021;
- Notice of Appeal on Order Appointment of Parenting Coordinator-filed August 26,
- Motion & Affidavit to Restart Visits filed August 31, 2021; and
- Affidavit to Support Objection to Appointment of Parenting Coordinator-filed September 5, 2021.

In May 2021, Jennifer filed a motion to appoint a parenting coordinator with the magistrate court, requesting appointment of a parenting coordinator due to the difficulty "co-parent[ing] effectively" with Mirsad; and a month later, she supplied the magistrate court with the name of an available parenting coordinator. The motion was granted.

<sup>&</sup>lt;sup>9</sup> September 10, 2020. PREFILING ORDER DECLARING **VEXATIOUS LITIGANT PURSUANT** TO I.C.A.R. 59

Following an additional opportunity to oppose the motion and the ruling by the magistrate, Mirsad filed a lengthy objection to the appointment of Jennifer's suggested coordinator, claiming the magistrate court "fail[ed] to state a claim upon which relief must be granted" under Federal Rule of Civil Procedure 12(b)(6), and that the magistrate court was in violation of various United States Supreme Court cases. The remainder of this objection repeated many of the claims from his original objection to Jennifer's Motion for Parenting Coordinator, including the same screenshots, and included an additional fourteen pages of information on parental alienation.

The repetitious nature of Mirsad's arguments opposing appointment of the parenting coordinator continue throughout the other nearly contemporaneous filings on this issue including:

- 1. Motion and Affidavit Objecting to Proposed Order Appointing Parenting Coordinator–This was filed August 13, 2021, in which Mirsad alleged "[the order] violates IRFLP 1002, lacks written evidences requested from this court, lacks due process, trespasses with the rights of the aggrieved, continues child abuse by officer of this court, and causes hardship to aggrieved and his children." That filing then included twenty-four pages repeating the information contained in his previous parenting coordinator objections, including the same arguments, screenshots, and information regarding parental alienation. *Id.*, pp.3-26.
- 2. Notice of Appeal of Order for Parenting Coordinator—this thirty-eight page document was filed August 26, 2021, the day before the hearing on Mirsad's objection above. It contained thirty-five pages of the same screenshots, arguments, and parental alienation information included in his previously filed objections. *See* Notice of Appeal of Order for Parenting Coordinator (filed 08/26/2021);

- 3. Motion and Affidavit to Restart Visits–filed August 31, 2021, in which Mirsad again repeated many of the same arguments and includes the same screenshots discussed in his previous objections to the parenting coordinator;<sup>10</sup> and
- 4. Affidavit to Support Objection to Appointment of Parenting Coordinator–Here, Mirsad asserted that the appointed coordinator has a conflict because Mirsad filed a bar complaint and a notice of claim for \$750,000. The filing references his past filings as part of the support for his motion and asks for additional time to find an acceptable parenting coordinator. No related motion to appoint a different coordinator was filed, as the court noted during the October 27<sup>th</sup> hearing.

The filings after the magistrate court's July 1<sup>st</sup> appointment of the parenting coordinator are frivolous and without merit.<sup>11</sup> They offer no valid basis for the objection to the parenting coordinator and appear merely obstreperous in nature, Mirsad objected because he was unhappy with the entire process and wished to exert control over Jennifer and the children. Ultimately, this is nothing more than multiple repeated baseless attempts by Mirsad to relitigate the cause of action, claim, controversy, and the issues decided by the magistrate court.

# e. August 26, 2021 Filings:

The next group concerns the following seven filings, all made on August 26, 2021:12

<sup>&</sup>lt;sup>10</sup> Pages 2-6 repeat the same arguments from pages 10-14 from the Notice to Court Objection Trespass Upon Rights filed August 5, and pages 3-7 from the Motion and Affidavit Objecting to Parenting Coordinator based on the children being "his DNA property;" pages 9-28 repeat the same parental alienation information from pages 10-26 of the Motion and Affidavit Objecting to Parenting Coordinator; and pages 28-40 repeat (including highlights) pages 26-37 of the Notice of Appeal of Order for Parenting Coordinator.

<sup>&</sup>lt;sup>11</sup> The appointment of parenting coordinator was made on the record during the July 1, 2021 hearing. The order was issued July 9.

<sup>&</sup>lt;sup>12</sup> There was also a motion for contempt filed on this day, but it will not be addressed here as it was discussed previously.

- Affidavit of Conflict of Interest;
- Motion & Affidavit for Contempt;
- Notice of Motion Objection Demand Dismissal of All Motions;
- Notice of Motion to Dismiss with Prejudice;
- Notice to Court Change of Venue;
- Notice to Court Demanding a Trial by Jury; and
- Petition for Non-Statutory Writ of Habeas Corpus.

#### i. Affidavit of Conflict of Interest

Here Mirsad asserted without foundation or basis that the appointed Parenting Coordinator had a conflict of interest preventing her from being impartial and a request for appointment of his proposed Parenting Coordinator. This filing is largely repetitive of the "Objection Trespass Upon Rights," filed on August 5, the "Motion Objecting to Parenting Coordinator," and the "Motion to Shorten Time," filed on August 27, and the "Urgent Motion" filed on August 31, 2021. Despite the allegations, there is no evidence provided of any conflict of interest and the document can be considered nothing more than an attempt to disrupt proceedings and relitigate issues.

#### ii. Motion & Affidavit for Contempt

This filing concerns allegations that Mirsad is entitled to equal custody despite the entry of Judgment in this case that had been previously issued. This contains no new information and is an attempt to continuously relitigate matters that have already been determined.

#### iii. Notice of Motion Objection Demand Dismissal of All Motions

Here Mirsad asserts that statements made by counsel in briefs or argument are not evidence and cannot form the basis for granting a motion, that as a non-lawyer, he should not be held to the same standards as a lawyer, and that under the federal rules, the court was required to dismiss the PREFILING ORDER DECLARING VEXATIOUS LITIGANT PURSUANT 20 TO I.C.A.R. 59

case because there was no evidence of jurisdiction or injury in fact. The arguments here are without any merit or basis in law and are repetitious in nature.

#### iv. Notice of Motion to Dismiss with Prejudice

This filing is again largely repetitious of claims that Mirsad has made throughout the course of the litigation despite the entry of judgment in the case.

# v. Notice to Court Change of Venue

This motion demands removal to the Federal Courts—a remedy that is not available under the circumstances here. It is also once again similar in nature to many of Mirsad's previous filings. Once again this constitutes an attempt to relitigate issues already determined by the magistrate court.

## vi. Notice to Court Demanding a Trial by Jury

This motion is meritless and is yet another attempt to relitigate issues already determined previously in the litigation.

#### vii. Petition for Non-Statutory Writ of Habeas Corpus

This petition is meritless because habeus petitions only apply to those that are in custody. 13

These motions were all properly denied by the magistrate judge as without merit or basis in law. Upon review, and as noted above, the documents constitute attempts to relitigate issues already determined and also constitute frivolous and unmeritorious documents.

11

<sup>&</sup>lt;sup>13</sup> The Court also questions whether such petition is an available mechanism of relief in a family law case subsequent to enactment of the Uniform Child Custody Jurisdiction act. See *Marks v. Vehlow*, 105 Idaho 560, 574, 671 P.2d 473, 487 (1983).

### f. Documents Relating to the Magistrate Judge

Beginning in late October, 2021, Mirsad began directing his filings against the magistrate judge personally. These filings include the following:

- Affidavit on Grievance;
- Affidavit on Bar Grievance Against Mr. Sullivan; and
- Notice of Claim for Mr. Sullivan.

#### i. **Affidavit on Grievance**

This filing appears to be a complaint to the judicial council. With no bearing on the issues in the divorce case.

# ii. Affidavit on Bar Grievance Against Mr. Sullivan for Child Abuse and Mental Torture

This document simply notes the filing of a bar grievance, again with no apparent bearing on the issue in the divorce case.

#### iii. Notice of Claim for Mr. Sullivan

Herein, Mirsad alleges the magistrate judge has committed multiple crimes and/or violations against him resulting from the decisions rendered in the divorce case. There is no merit to the filing.

None of these filings have any relevance to the divorce and custody matters before the magistrate judge. They are inappropriate filings and can only be considered further attempt to delay or complicate the proceedings.

# g. Other documents in the divorce proceeding

There are several other recent filings since the referral of Mirsad as a vexatious litigant that have not yet been ruled upon by the magistrate court, but that appear to amount to no more than additional meritless argument/motions or attempts to relitigate issues previously adjudicated in much the same way as those filings specified above. A sampling of those documents is as follows:

- 1. First Motion and Affidavit for Contempt filed October 21, 2021;
- 2. Affidavit of Status filed October 27, 2021;
- 3. Special Appearance filed November 8, 2021;
- 4. Motion and Affidavit to Clarify filed November 8, 2021;
- 5. Second Motion and Affidavit for Contempt filed November 12, 2021 and amended November 18, 2021;
- 6. Affidavit with Objection to Writ of Plea filed November 22, 2021;
- 7. Affidavit in Support of First and Second Motions for Contempt filed November 22, 2021;
- 8. Notice of Federal Claim Filed December 8, 2021;
- 9. Demand to Appellate Court to Show all Evidence filed December 17, 2021;
- 10. Second Demand for Written Response filed December 17, 2021;
- 11. Notice of Objection to December 20, 2021 Order filed December 22, 2021;
- 12. Six distinct motions for contempt files December 24, 2021;
- 13. Four motions for contempt filed January 3, 2022; and
- 14. Notice of Immediate Urgent Motion for Court to Issue a Statement Clarifying Final Judgment filed January 5, 2022.

The Court has not considered these motions in making its decision regarding whether Mirsad is a vexatious litigant; however, it is noted that these documents reflect that Mirsad apparently intends to continue his now long-standing pattern of filings.

#### h. Filings in the present case

Following the prefiling order issued on September 7, 2021, in the present case, Mirsad filed multiple documents in response to the proposed prefiling order. While several were ministerial in nature, the substantive filings are as follows:

- Affidavit in Objection;
- Affidavit in Confirmation of Bar Grievance;
- Affidavit Requesting Sanctions;
- Affidavit on Mr. VanderVelde and Mr. Southworth;

• Notice to Court Motion to Dismiss and Notice to Change of Venue; and

• Order (proposed) for compensation.

i. Affidavit in Objection

In this document, Mirsad makes multiple claims and arguments including, but not limited

to, the violation of numerous constitutional provisions; the lack of a valid claim before the court;

the fact that because he did not bring this case, none of his filings are frivolous, that he was robbed

of his property (his children); that he was not warned about the length of his filings; and that he

has only been involved in two other small claims in Idaho, thus his claims here are not vexatious

or frivolous. He also sets forth his own allegations of conspiracy and his reasoning as to the errors

of the proceedings below.

ii. Affidavit in Confirmation of Bar Grievance

Herein Mirsad asserts that the filing of the bar related documents in the divorce case were

informational and not frivolous. However, a document that bears no relevance to the issues at hand

is frivolous. There is nothing about a judicial complaint that makes any issue decided in Mirsad's

divorce case more or less likely. It was simply an attempt by Mirsad to express his frustration and

displeasure with the court's rulings;

iii. Affidavit Requesting Sanctions

This document is simply another attempt to readjudicate the determinations made by the

magistrate judge in the divorce proceeding;

iv. Affidavit on Mr. VanderVelde and Mr. Southworth

This filing challenges the validity of the divorce judgment both because he was denied a

jury trial and because the court lacks personal jurisdiction. It is not clear whether Mirsad is

referencing the jurisdiction of the magistrate court or this Court; however, as discussed above, his

PREFILING ORDER DECLARING VEXATIOUS LITIGANT PURSUANT TO I.C.A.R. 59

24

presence before the Court subjects him to the personal jurisdiction herein. Simply stating he is making a special appearance, whether in this specific document or others, is insufficient to avoid submission to jurisdiction of the court where Mirsad brings up issues and argues for relief other than those relating to jurisdiction. I.R.C.P. 4.1;

#### v. Notice to Court Motion to Dismiss and Notice to Change of Venue

Herein, Mirsad states, "Vexatious litigant is unconstitutional declaration AND in my case it is used to intimidate, frighten, harass, fear monger, and to deprive my first amendment right to free speech and right to defend in the court of law and right to petition the court and sixth amendment [sic] right confrontation clause to be Belligerent in person." He also claims to be a sovereign state citizen national and attempts to prohibit the Court from calling him a citizen. He then asks for a change of venue to an Article 3 court. While clearly expressing his vehement disagreement with the current proceeding, this document advances no meritorious facts or law that would weigh against him being found a vexatious litigant. As to his request for a change of venue to an Article 3 court, it is not clear Mirsad understands his own argument. To the extent he references removal to federal court, he does not meet the jurisdictional requirements for the same. The present court is the appropriate venue for the matter at hand. See I.C.A.R. 59; and

# vi. Order (proposed) for compensation

Finally, submitted to this Court but not filed was a request for compensation for the time spent responding to some actions of the petitioner. The Court is not clear who the petitioner in this instance might be or what the complained of actions were. Further, *pro se* litigants are not entitled to such compensation. This document is therefore without any merit in law.

None of the documents filed by Mirsad in this case present any meritorious defense to the prefiling order or provide explanation as to why Mirsad should not be determined to be a vexatious

litigant. Rather, each of these filings constitute continued renewed attempts, and the emphasis of Mirsad's belief, that he has the right to continue to file any documents he wishes, saying anything he wishes, and relitigate issues already determined by the magistrate court.

#### i. Hearing in the present case

The hearing in this case took place on December 2, 2021. First, both through filings and at the hearing on this matter, Mirsad attempted to appear through individuals who are not licensed to practice law in Idaho. This request was denied. During the hearing, Mirsad offered no meritorious explanation for the frequent, repetitive and/or meritless filings that he continues to file in his divorce proceeding. Instead, Mirsad once again attempted to relitigate that case. Moreover, Mirsad acknowledged that he is a vexatious litigant, and he clearly believes that this continuing such behavior is necessary to protect his rights relating to custody of his children.

# **CONCLUSION AND ORDER**

Idaho Court Administrative Rule 59(d)(2) permits a court to find a person to be a vexatious litigant where that person has, in effect, sought to repeatedly re-litigate a final determination made against that person. Additionally, Idaho Court Administrative Rule 59(d)(3) permits a court to make a vexatious litigant finding where a *pro se* litigant has "repeatedly file[d] unmeritorious motions, pleadings, or other papers, conduct[ed] unnecessary discovery, or engage[d] in other tactics that are frivolous or solely intended to cause unnecessary delay." It is evident from a thorough review of case CV14-19-1606 and the information set forth above that Mirsad Hajro is a vexatious litigant as defined under both 59(d)(2) and (3). He demonstrates a clear pattern of filing frivolous motions and other documents that have no merit. Further, such filings They are simply attempts to relitigate issues already decided on facts and evidence already considered. This Court

therefore concludes that a prefiling order should be entered against him pursuant to I.C.A.R. 59(c),

(d) and (e).

Pursuant to this court's finding Mirsad Hajro is ordered not to file any new pro se litigation,

either in this case, the underlying proceeding CV14-19-1606, or in any new action, in this state

without first obtaining leave of the court where the litigation is proposed to be filed.

Mirsad Hajro is further notified that disobedience of this order may be punished as a

contempt of court and can result in the court dismissing any action filed by as provided by I.C.A.R.

59(h) and (j).

Dated;

1/11/2022 02:44 PM

Davis F. VanderVelde

Administrative District Judge

Dollar

Third Judicial District of Idaho

# **CLERK'S CERTIFICATE OF SERVICE**

| I HEREBY CERTIFY that on this day of January 2022, I caused to be served a true and correct copy of the foregoing order by the method indicated below, and addressed to the following persons:   |                             |
|--|-----------------------------|
| Brooke A. O'Neil, Sarah E. Scott, Greta C LAW/ALTERNATIVES/PLLC 2404 Bank Dr., Ste. 201 P.O. Box 50269 Boise, ID 83705 boneil@lawalternativesidaho.com sscott@lawalternativesidaho.com gnycklemore@lawalternativesidaho.com Attorneys for Petitioner, Jennifer Hajro | . Nycklemore                |
| Mirsad Hajro<br>mhajro@gmail.com<br><i>Pro Se Respondent</i>   | ⊠ E-Mail                    |
| Jamie Robb<br>Trial Court Administrator  | ⊠ E-Mail                    |
| Hon. Davis F. VanderVelde  Administrative Judge  | ⊠ E-Mail                    |
| Hon. Thomas A. Sullivan  Magistrate Judge  | 🔀 E-Mail                    |
|  | CLERK OF THE DISTRICT COURT |

By: Ohmon Castar
Deputy Clerk

| <b>Odyssey Document Date</b> | <b>Physical Filing Date</b> | <b>Odyssey Document Title</b>                                   |
|------------------------------|-----------------------------|---|
| 02/22/2019                   |                             | Family Case Law Information Sheet                               |
| 02/22/2019                   |                             | Motion and Affidavit for Fee Waiver                             |
| 02/28/2019                   |                             | Order Granting Fee Waiver                                       |
| 02/28/20219                  |                             | Summons Issued  |
| 02/28/2019                   |                             | Petition for Divorce (With Minor Children)                      |
| 02/28/2019                   |                             | Order to Attend Focus on Children                               |
| 02/28/2019                   |                             | Summons Hajro, Mirsad Served: 03/03/2019                        |
| 03/11/2019                   |                             | Affidavit of Service- Mirdad served 03/09/219                   |
| 03/12/2019                   |                             | Status Report- Focus on Children Defendant<br>Appeared/Complied |
| 03/18/2019                   | 03/15/2019                  | Family Case Law Information Sheet                               |
| 03/18/2019                   | 03/15/2019                  | SEC-Response to Petition-Family Mirsad H.                       |
| 03/20/2019                   |                             | FOC Status Report 03/13/2019 Petitioner attended                |
| 03/20/2019                   |                             | Affidavit of Service- Jennifer served 03/15/2019                |
| 03/21/2019                   | 03/20/2019                  | SEC- Amended Response to Petition-<br>Family                    |
| 03/22/2019                   |                             | Amended Reply to Counterclaim                                   |
| 04/02/2019                   |                             | WF-FCS File Review Screening                                    |
| 04/03/2019                   |                             | Certificate of Service- Jennifer served 03/20/2019              |
| 04/04/2019                   | 04/03/2019                  | Certificate of Service  |
| 04/04/2019                   | 04/03/2019                  | Motion for Temporary Order- Respondent                          |
| 04/04/2019                   | 04/03/2019                  | Affidavit   |
| 04/04/2019                   | 04/03/2019                  | Notice of Hearing   |
| 04/04/2019                   |                             | Proposed Order for Temporary Custody (HOLD)                     |
| 04/08/2019                   |                             | Order for Family Civil Intake Screen                            |

| 04/08/2019 |                           | Order Setting Case   |
|------------|---------------------------|--|
| 04/11/2019 |                           | Affidavit  |
| 04/11/2019 |                           | Response to Motion- Family- for Temporary<br>Custody Order-Petnr |
| 04/11/2019 |                           | Status Report FCS Family Intake Screening                        |
| 04/15/2019 |                           | WF Notice of Appearance J. Roark for J. Hajro                    |
| 04/15/2019 |                           | Affidavit Support of Objection to Motion for Temp Ords-Ptnr      |
| 04/19/2019 | (Judge signed 3/16/20/18) | Joint Preliminary Injunction                                     |
| 04/30/2019 |                           | Order for Mediation- MPX1  |
| 04/30/2019 |                           | Temporary Order Custody-MPX1                                     |
| 04/30/2019 |                           | Supplemental Order   |
| 05/01/2019 |                           | Copy/Audio Request   |
| 05/08/2019 |                           | Notice of Service of Mandatory Disclosures                       |
| 05/20/2019 |                           | Mediation Status Report- Ongoing                                 |
| 06/14/2019 |                           | Affidavit 04/15/2019   |
| 06/14/2019 |                           | Affidavit 04/11/2019   |
| 06/19/2019 |                           | Motion to Reconsider   |
| 06/19/2019 |                           | Notice of Hearing  |
| 06/19/2019 |                           | Affidavit in Support of Motion to Reconsider                     |
| 06/19/2019 |                           | Proposed Order for Motion to Reconsider<br>Hold for Hearing      |
| 06/19/2019 |                           | WF Response to Courts Request- Mirsad                            |
| 06/19/2019 |                           | WF (6/25)-Notice of Proposed Providers                           |
| 06/19/2019 |                           | Affidavit in Support of Motion                                   |
| 06/19/2019 |                           | Motion to Amend Temporary Orders                                 |
| 06/19/2019 |                           | Affidavit on Low Quality Therapist                               |
| 06/25/2019 |                           | Notice of Hearing  |
|            |                           |  |

| 06/25/2019    | Motion to Strike   |
|---------------|--|
| 06/25/2019    | Proposed order to strike   |
| 06/26/2019    | Referral and Order for Investigation   |
| 07/03/2019    | Affidavit against motion to amend  |
| 07/08/2019    | Notice of Submission of Counseling<br>Records                                |
| 07/11/2019    | Order for Safety Plan (mp; no cert)  |
| 07/11/2019    | Order for Reunification Therapy (mp; no cert)                                |
| 07/11/2019    | Mediation Status Report - At Impasse   |
| 07/15/2019    | Notice of Service of Discovery Requests<br>Notice of Service Interrogs-Hajro |
| 07/23/2019    | Motion to Compel   |
| 07/23/219     | Affidavit of J. Roark in Support of Motion to Compel                         |
| 07/23/2019    | Notice of Hearing  |
| 07/25/2019    | Certificate of Service   |
| 07/25/2019    | Affidavit for Proposed Order from 6/26/19<br>Hearing                         |
| 07/26/2019    | Report of Investigation Court Ordered  |
| 07/30/2019    | Amended Order for Child Custody and Support                                  |
| 07/30/2019    | Supplemental Order   |
| 07/30/219     | Proposed Order on Motion to Reconsider                                       |
| 07/30/2019    | Affidavit for Motion to Compel   |
| 07/30/2019    | Affidavit for Motion to Amend  |
| 07/30/2019    | Notice of Hearing - 07.31.19 - Resp's Motn to Reconsider                     |
| 07/30/2019    | Motion to Amend (Thumbrive w/ Secretary)                                     |
| 07/31/2019    | Request to Inspect or Obtain Copies/Audio                                    |
| 08/01/2019    | Notice of Hearing  |
| EXHIBIT A p.3 |  |

| 08/01/2019 | Motion for In Camera Interview                                  |
|------------|---|
| 08/02/2019 | Order Setting Case and Scheduling Order (T. Sullivan)           |
| 08/08/2019 | Notice of Service- Petitioner's                                 |
| 08/08/2019 | Objection -Petitioner's   |
| 08/08/2019 | Affidavit of J. Hajro   |
| 08/08/2019 | Affidavit of J. Roark   |
| 08/09/2019 | Motion to Compel  |
| 08/09/2019 | Proposed Order to compel  |
| 08/09/2019 | Notice of Hearing   |
| 08/09/2019 | Affidavit in Support of Motion to Compel                        |
| 08/09/2019 | Objection to in camera interview and school schedule.pdf        |
| 08/09/2019 | Affidavit on objection for school schedule                      |
| 08/14/2019 | Affidavit on Opposing Parties<br>Manipulations & Parental Alien |
| 08/16/2019 | Notice of Hearing for Motion to Compel                          |
| 08/16/2019 | Aff-response to interogs  |
| 08/19/2019 | Memorandum of Costs & Attorney Fees                             |
| 08/21/2019 | Objection to Motion to Compel                                   |
| 08/23/2019 | Second Amended Temporary Order (T. Sullivan)                    |
| 08/27/2019 | Order for Interview of Minor Children                           |
| 08/27/2019 | Order to Compel and for Atty Fees                               |
| 08/27/2019 | WF (8/27)-Proposed Order for Motion to Continue                 |
| 08/27/2019 | Motion and Affidavit to Continue                                |
| 08/27/2019 | Order Setting Case  |
| 08/29/2019 | Request to inspect or obtain Copies of Judicial Records         |

| 08/30/2019 |            | WF (8/30)-Affidavit of Clarafication of Order to Compel from 08/27/19           |
|------------|------------|---|
| 08/30/2019 |            | Affidavit in Support of Motion for Sanctions                                    |
| 08/30/2019 |            | Motion to Shorten Time  |
| 08/30/2019 |            | WF- Motion for Sanctions  |
| 09/01/2019 |            | Affidavit of clarification of 8.27.19 Order to compel-amende                    |
| 09/03/2019 |            | Request to Inspect or Obtain Copies/Audio                                       |
| 09/03/2019 |            | Audio/Copy Request  |
| 09/04/2019 | 09/01/2019 | Affidavit in Response to Motion to sanction                                     |
| 09/05/2019 |            | Order to Shorten Time Petitioner's Motion for Sanctions (NO Cert) (T. Sullivan) |
| 09/05/2019 |            | Proposed Order for relief and to sanction (No Cert)                             |
| 09/05/2019 | 09/01/2019 | Motion for relief and to sanction   |
| 09/05/2019 | 09/01/2019 | Motion to Shorten Time  |
| 09/05/2019 | 09/01/2019 | Affidavit in support of motion for relief and to sanction                       |
| 09/06/2019 |            | WF- Pretrial Memorandum- Petitioner's   |
| 09/06/2019 |            | WF- Pretrial Memorandum- Respondent's   |
| 09/07/2019 |            | Objection to Pretrial memorandum  |
| 09/09/2019 | 09/01/2019 | Letter with Discoveries   |
| 09/10/2019 |            | WF (9/11)-Report - FCS Interview of a minor child                               |
| 09/11/2019 |            | WF Memorandum of Costs & Attorney Fees  |
| 09/11/2019 |            | Notice of Service – Supplemental  |
| 09/13/2019 |            | Letter with Answers to 9/6/19 Request   |
| 09/16/2019 |            | Order Releasing Interview (no mp/cert)  |
| 09/17/2019 |            | Audio/Copy Request  |
|            |            |   |

| 09/20/2019 | Order Granting Motion for Santions (no mp/cert)                         |
|------------|---|
| 09/21/2019 | letter of Non-received Evidence & Discoveries                           |
| 09/30/2019 | Audio/Copy Request  |
| 01/08/2020 | Proposed Order - to Continue - no mp/no cert *hold for hearing*         |
| 01/08/2020 | Motion to Shorten Time  |
| 01/08/2020 | Motion and Affidavit to Continue  |
| 01/09/2020 | Order to Shorten Time - no mp/no cert                                   |
| 01/09/2020 | Notice of Hearing   |
| 01/09/2020 | Affidavit of Service Risa Mortensen                                     |
| 01/09/2020 | Affidavit of Service Jeff Moreno  |
| 01/09/2020 | Objection to Motion to Continue   |
| 01/13/2020 | Petitioner's Exhibit 002 - Letter From Risa<br>Mortensen Dated 07/03/19 |
| 01/14/2020 | Exhibit List/Log  |
| 01/17/2020 | Audio/Copy Request  |
| 01/23/2020 | Notice of Service   |
| 02/07/2020 | Request to Inspect or Obtain Copies.Audio                               |
| 03/20/2020 | Amended Order Setting Case  |
| 04/01/2020 | Second Amended Order Setting Case                                       |
| 04/15/2020 | WF Motion & Affidavit to Change Therapist  – Defendant                  |
| 04/27/2020 | Order Setting Case- Telephonic Hearing                                  |
| 05/04/2020 | wf Objection to Motion and affidavit                                    |
| 05/06/2020 | Order Setting Case  |
| 05/18/2020 | Request to Inspect or Obtain Copies/Audio                               |
| 05/20/2020 | Motion to Shorten Time & Continue                                       |
| 05/20/2020 | WF Proposed Order to Continue   |
|            |   |

| 05/22/2020 | Notice of Service- Petnr   |
|------------|--|
| 05/22/2020 | Subpoena Issued- Jeff Moreno   |
| 05/26/2020 | Exhibit List/Log   |
| 05/26/2020 | Petitioner's Exhibit 003 - Copies Of Text<br>Messages (Three Pages)                                      |
| 05/26/2020 | Petitioner's Exhibit 004 - E-mail From<br>Respondent To Petitioner Dated December<br>26, 2018 (One Page) |
| 05/26/2020 | Petitioner's Exhibit 005 - Text Messages<br>Between Petitioner And Child (Nurah) (Six<br>Pages)          |
| 05/26/2020 | Petitioner's Exhibit 011 - Petitioner's Proposed Judgment And Decree                                     |
| 05/26/2020 | Petitioner's Exhibit 013 - Copies From<br>Petitioner's Journal In Regards To Visitation<br>And Exchanges |
| 05/26/2020 | Petitioner's Exhibit 014 - Report Cards  |
| 05/26/2020 | Petitioner's Exhibit 015 - Three Letters (Three Pages Total)   |
| 05/27/2020 | Proposed Respondent's Exhibits   |
| 05/27/2020 | Certificate of Service for Electronic Exhibits  – Mirsad   |
| 05/28/2020 | WF Proposed Order to Shorten Time and Contempt   |
| 05/28/2020 | Motion and Affidavit to Shorten Time,<br>Contempt and Sanction   |
| 05/29/2020 | Objection to Motion for Contempt and Motion to Shorten Time  |
| 06/11/2020 | Records Request  |
| 06/18/2020 | Request to Inspect or Obtain Copies/Audio  |
| 06/22/2020 | Exhibit List/Log   |
| 06/22/2020 | Respondent's Exhibit 101 - Receipt AMT<br>Coffee Ireland Dublin Airport                                  |
|            |  |

| 06/22/2020 | Respondent's Exhibit 102 – DB                                       |
|------------|---|
| 06/22/2020 | Respondent's Exhibit 103 - Invoice 2018-3473844                     |
| 06/22/2020 | Respondent's Exhibit 104 – Video                                    |
| 06/22/2020 | Respondent's Exhibit 105 - Video Called "Angry"                     |
| 06/23/2020 | Temporary Orders Taxes and Holiday (Sullivan)                       |
| 06/26/2020 | WF Proposed Order Re: Motion for Contempt (No Cert)                 |
| 06/26/2020 | Notice of Hearing - 06.26.2020 - Respondents Motion for Contempt    |
| 06/26/2020 | Motion and Affidavit for Contempt                                   |
| 07/01/2020 | Objection to second motion for contempt and motion to shorten time  |
| 07/03/2020 | WF Motion and Affidavit for Contempt – Amended                      |
| 07/10/2020 | Notice of Hearing   |
| 07/10/2020 | Proposed Order re Motion for Contempt *hold for hearing*            |
| 07/10/2020 | Motion and Affidavit for Contempt – Amended                         |
| 07/14/2020 | Letter with List of Exhibits  |
| 07/15/2020 | Proposed Other Document Requiring Court Signature                   |
| 07/17/2020 | WF Motion & Affidavit for Contempt-<br>Second Amended - Defendant's |
| 07/20/2020 | Objection to Third Motion for Contempt – Petitioner                 |
| 07/23/2020 | Motion for Contempt - Respondent – Amended                          |
| 07/23/2020 | WF Proposed Order Re: Motion for Contempt (No Cert)                 |
|            |   |

| 07/23/2020 | WF Proposed Order on Motion to Sanction (No Cert)  |
|------------|--|
| 07/23/2020 | Motion to Shorten Time – Respondent  |
| 07/23/2020 | Affidavit in Support of Respondent's Motion for Contempt – Amended                             |
| 07/23/2020 | Motion and Affidavit to Sanction – Respondent  |
| 07/24/2020 | Substitution of Counsel  |
| 07/28/2020 | DENIED Proposed Order on Motion to<br>Shorten Time (No Cert)                                   |
| 07/30/2020 | Notice of Hearing  |
| 07/30/2020 | Proposed Order on Motion for Contempt -<br>Respondent's no mp no cert ** Hold for<br>Hearing** |
| 07/30/2020 | Motion for Contempt - Respondent's **Hold for Hearing**  |
| 07/30/2020 | Affidavit in Support of Motion for Contempt - Respondent's                                     |
| 07/31/2020 | WF Notice of Non-Availability  |
| 07/31/2020 | Partial Satisfaction of Judgment of Attorney<br>Fees - \$30 Paid                               |
| 08/03/2020 | Notice of Hearing - Respondent's Motion for Contempt & Sanctions                               |
| 08/10/2020 | Motion to Continue   |
| 08/12/2020 | Order to Continue  |
| 08/12/2020 | Motion For contempt amended  |
| 08/12/2020 | wf Proposed Order For Motion For<br>Sanctions Amended  |
| 08/12/2020 | wf Proposed Order Contempt amended   |
| 08/12/2020 | Affidavit in support of motion for contempt  |
| 08/12/2020 | Motion & Affidavit for Sanctions Amended   |
| 08/19/2020 | Objection to Fourth Motion for Contempt  |
|            |  |

| 08/27/2020 | Notice of Hearing for Motion to Contempt   |
|------------|--|
| 08/27/2020 | Motion for Contempt - Respondent's   |
| 08/27/2020 | Proposed Order for Motion for Contempt **hold for hearing**                      |
| 08/27/2020 | Affidavit ISO for Motion for Contempt  |
| 09/03/2020 | Objection to Fifth Motion for Contempt   |
| 09/08/2020 | Motion for Contempt- Amended   |
| 09/09/2020 | Proposed Order of Amended Motion for<br>Contempt *Hold for Hearing               |
| 09/11/2020 | WF- Verified Motion to Amend Second<br>Amended Temporary Order                   |
| 09/14/2020 | objection to Amend Second Amended<br>Temporary Order v4                          |
| 09/14/2020 | Respondent's Exhibit 200 - 07/09/2020 IDHW Letter                                |
| 09/14/2020 | Respondent's Exhibit 201 - 02/26/2020 IDHW Letter                                |
| 09/14/2020 | Respondent's Exhibit 202 - 07/26/2019 IDHW Letter                                |
| 09/14/2020 | Respondent's Exhibit 203 - 06/11/2019 IDHW Letter                                |
| 09/14/2020 | Respondent's Exhibit 204 - 07/08/2019 IDHW Letter                                |
| 09/14/2020 | Respondent's Exhibit 205 - St. Al's, Patient Plan Dated 06/17/2020, 5 Pages      |
| 09/14/2020 | Respondent's Exhibit 206 - St. Al's, Patient Plan Dated 07/01/2020               |
| 09/14/2020 | Respondent's Exhibit 207 - One Page Text<br>Message Dated 11/21/2018             |
| 09/14/2020 | Respondent's Exhibit 208 - Text Message<br>Dated 11/23-12/28/2018                |
| 09/14/2020 | Respondent's Exhibit 209 - 11 Pages, Text<br>Messages And Additional Pages Added |
|            |  |

| 09/14/2020 | Respondent's Exhibit 210 - Picture Of Islamic Culture                        |
|------------|--|
| 09/14/2020 | Respondent's Exhibit 211 - Picture Of Mosque                                 |
| 09/14/2020 | Respondent's Exhibit 212 - Two Page<br>Holiday Celebration Picture           |
| 09/14/2020 | Respondent's Exhibit 213 - Picture 06/07/2019 Of Area Where Jennifer's House |
| 09/14/2020 | Respondent's Exhibit 214 - Target Website<br>Re: Products 6 Pages            |
| 09/14/2020 | Respondent's Exhibit 215 - Two Pages<br>Pictures Of Bag Interior             |
| 09/14/2020 | Respondent's Exhibit 216 - Odyssey Printout                                  |
| 09/14/2020 | Respondent's Exhibit 217 - Picture Of H&W Pamphlet                           |
| 09/14/2020 | Respondent's Exhibit 218 - Food And<br>Nutrition Pamphlet                    |
| 09/14/2020 | Respondent's Exhibit 220 - Retirement<br>System Case Refund Form             |
| 09/14/2020 | Respondent's Exhibit 222 - Arm With Bites (Mr. Hajro)                        |
| 09/14/2020 | Respondent's Exhibit 223 - Text Message<br>Re: Cure For COVID                |
| 09/14/2020 | Respondent's Exhibit 225 - Pictures Of<br>Homework                           |
| 09/14/2020 | Respondent's Exhibit 226 - Picture Of Nina<br>And Mirsad Hajro               |
| 09/14/2020 | Respondent's Exhibit 227 - Stellar Mental<br>Health And Mediation Letters    |
| 9/14/2020  | Respondent's Exhibit 228A - Copy Of Check                                    |
| 09/14/2020 | Respondent's Exhibit 228B - Transaction History                              |

| 09/14/2020 |            | Respondent's Exhibit 228C - Withdrawal Slip   |
|------------|------------|---|
| 09/14/2020 |            | Respondent's Exhibit 229 - Picture Of<br>Modest Attire                              |
| 09/14/2020 |            | Respondent's Exhibit 230 - Picture Of Nina<br>Hajro                                 |
| 09/14/2020 |            | Respondent's Exhibit 232 - Itinerary Flight Record                                  |
| 09/14/2020 |            | Respondent's Exhibit 233 - Text Message<br>From Mr. Hajro To Mrs. Hajro 11/20-12/26 |
| 09/14/2020 |            | Respondent's Exhibit 234 - 11/23/19, Text<br>Message                                |
| 09/14/2020 |            | Respondent's Exhibit 235 - 05/28/19, Text<br>Messages                               |
| 09/14/2020 |            | Respondent's Exhibit 236 - Screenshot From<br>Risa Mortensen Website                |
| 09/14/2020 |            | Respondent's Exhibit 237 - CDC Printout   |
| 09/14/2020 |            | Respondent's Exhibit 238A - Bank<br>Statement                                       |
| 09/14/2020 |            | Respondent's Exhibit 238B - Bank<br>Statement                                       |
| 09/15/2020 |            | Exhibit List/Log  |
| 09/15/2020 |            | Records Request   |
| 09/16/2020 |            | WF Proposed Order of Judgment for<br>Attorney and Paralegal Fees                    |
| 09/16/2020 |            | WF Proposed Order for Attorney and Paralegal Fees & Costs                           |
| 09/16/2020 |            | Memorandum of Attorney and Paralegal Fees   |
| 09/18/2020 |            | Third Amended Temporary Order   |
| 09/18/2020 | 09/17/2020 | Objection for Attorney Fees   |
| 09/18/2020 | 09/17/2020 | Objection to Amend Second Amended<br>Temporary Order                                |
|            |            |   |

| 09/18/2020 | Supplemental Order   |
|------------|--|
| 09/22/2020 | Notice of hearing for objection for Third<br>Amended Temporary Order and motion for<br>sanctions |
| 09/23/2020 | Motion to Shorten Time   |
| 09/23/2020 | Affidavit on 3rd amended order   |
| 09/24/2020 | Motion to Modify 3rd Amended Order   |
| 09/24/2020 | wf Proposed Order to modify 3rd amended order  |
| 09/26/2020 | Objection to Motion to Amend Third<br>Amended Order  |
| 09/28/2020 | DENIED Order to Shorten Time   |
| 09/28/2020 | Order to Shorten Time-Amended  |
| 10/07/2020 | WF Report- Reintegration Therapy   |
| 10/13/2020 | Objection to Inaccurate Proposed Fourth<br>Temporary Order                                       |
| 10/16/2020 | Affidavit of Jennifer Hajro Re: Counseling   |
| 10/19/2020 | Fourth Temporary Order   |
| 10/20/2020 | Exhibit List/Log   |
| 10/20/2020 | Respondent's Exhibit 300 - Article from BSU Re: Misrad Hajro                                     |
| 10/20/2020 | Respondent's Exhibit 301 - Email from Jennifer Hajro   |
| 10/20/2020 | Respondent's Exhibit 302 - Text Picture of Marijuana Info  |
| 10/20/2020 | Respondent's Exhibit 303 - Wells Fargo<br>Account Dated 02/22/2019                               |
| 10/20/2020 | Respondent's Exhibit 305 - Text Message<br>Dated 03/22/2020                                      |
| 10/20/2020 | Respondent's Exhibit 306 - Text Message<br>Re: Laylaa 03/22/2020                                 |

| 10/20/2020  Respondent's Exhibit 309 - Capital One Bank Statement Dated 09/23/2017  Respondent's Exhibit 310 - Text Message Dated 01/25/2019  10/20/2020  Respondent's Exhibit 311 - Another Text Message Dated 01/25/2019  10/20/2020  Respondent's Exhibit 312 - Text Message |
|---|
| Dated 01/25/2019  10/20/2020  Respondent's Exhibit 311 - Another Text Message Dated 01/25/2019  |
| Message Dated 01/25/2019  |
| 10/20/2020 Respondent's Exhibit 312 - Text Message  |
| Dated 03/20/2020  |
| 10/20/2020 Respondent's Exhibit 313 - Text Message Dated 04/24/2020   |
| 10/20/2020 Respondent's Exhibit 314 - Text Message Dated 04/11/2020   |
| 10/20/2020 Respondent's Exhibit 315 - Stellar Report<br>Two Pages   |
| 10/20/2020 Respondent's Exhibit 316 - Text Message, 09/20/2020  |
| 10/20/2020 Respondent's Exhibit 318 - Emails Between Parties Dated 01/25/2020 Re: LifeWay   |
| 10/20/2020 Respondent's Exhibit 319 - Email Re:<br>Settlement Offer Dated 01/10/2020  |
| 10/20/2020 Respondent's Exhibit 320 - Email Dated 0 3/15/2020   |
| 10/20/2020 Respondent's Exhibit 321 - Two Page, CPS<br>Report Dated 06/26/2019  |
| 10/20020 Respondent's Exhibit 322 - Two Page, CPS<br>Report Dated 02/10/2020  |
| 10/20/2020 Respondent's Exhibit 323 - CPS Report Dated 06/16/2020   |
| 10/20/2020 Respondent's Exhibit 324 - CPS Report Dated 04/28/2020   |
| 10/20/2020 Respondent's Exhibit 325 - Text Message Dated 09/13/2020   |

| 10/20/2020 | Respondent's Exhibit 326 - Text Message<br>Dated 09/13/2020                      |
|------------|--|
| 10/20/2020 | Respondent's Exhibit 327 - Letter From Mr. Fischer 09/09/2019                    |
| 10/20/2020 | Respondent's Exhibit 328 - Text Message<br>Dated 12/10/2019                      |
| 10/20/2020 | Respondent's Exhibit 329 - Text Message<br>Dated 12/17/2019                      |
| 10/20/2020 | Respondent's Exhibit 330 - Steven Miller M.D. Re: Parental Alienation            |
| 10/20/2020 | Respondent's Exhibit 331 - Text Message<br>Dated 02/23/2020                      |
| 10/20/2020 | Respondent's Exhibit 332 - Text Message<br>Dated 02/08/2020 And 02/12/2020       |
| 10/20/2020 | Respondent's Exhibit 333 - Text Message<br>Dated 02/07/2020                      |
| 10/20/2020 | Respondent's Exhibit 334 - Text Message<br>Dated 02/04/2020                      |
| 10/20/2020 | Respondent's Exhibit 335 - Emails Re:<br>Misrad Hajro's Business/Employment Info |
| 10/20/2020 | Respondent's Exhibit 336 - Email Re: Bank<br>Account Closed, Dated 04/04/2019    |
| 10/20/2020 | Respondent's Exhibit 337 - Texting from The Parties June Through August          |
| 10/20/2020 | Respondent's Exhibit 338 - Text Message Dated 10/11/2019                         |
| 10/20/2020 | Respondent's Exhibit 339 - Text Message<br>Dated 10/11/2019                      |
| 10/20/2020 | Respondent's Exhibit 340 - Text Message<br>Dated 01/25-27/19                     |
| 10/20/2020 | Respondent's Exhibit 341 - Text Message<br>Dated 01/17-19/19                     |
| 10/20/2020 | Respondent's Exhibit 342 - Picture Dated 05/27/2020                              |
|            |  |

| 10/20/2020 | Respondent's Exhibit 343 - Picture of Messy<br>Car   |
|------------|--|
| 10/21/2020 | Proposed Other Document Requiring Court<br>Signature - Exhibits Log for Zoom Hearing -<br>Respondent's |
| 10/26/2020 | Amended Fourth Temporary Order   |
| 10/26/2020 | Exhibit List/Log   |
| 10/26/2020 | Exhibit List/Log   |
| 10/26/2020 | Petitioner's Exhibit 100 - Idaho Behavioral<br>Health  |
| 10/26/2020 | Respondent's Exhibit 344 - IDHW Letter Dated 10/20/2020  |
| 10/26/2020 | Respondent's Exhibit 345 - Emails, Various   |
| 10/26/2020 | Respondent's Exhibit 346 - Email To Jeff<br>From Jennifer Hajro  |
| 10/26/2020 | Respondent's Exhibit 347 -<br>Statement/Invoice (Incomplete)   |
| 10/26/2020 | Respondent's Exhibit 348 - Statement (Incomplete)  |
| 10/26/2020 | Respondent's Exhibit 349 - Text Message<br>Dated 10/12/2019 Between Parties                            |
| 10/26/2020 | Respondent's Exhibit 350 - Letter From Wells Fargo   |
| 10/26/2020 | Respondent's Exhibit 351 - Bank Statement For Wells Fargo  |
| 10/26/2020 | Respondent's Exhibit 352 - Affidavit Verifying Income  |
| 10/26/2020 | Respondent's Exhibit 353 - Text Message Dated 11/08/2019   |
| 10/26/2020 | Respondent's Exhibit 354 - Text Message<br>Dated 12/13/2019  |
| 10/26/2020 | Respondent's Exhibit 355 - String Of<br>Emails/Text Messages Between The Parties<br>04/10-11/2019      |

| 10/26/2020 | Respondent's Exhibit 357 - Email Dated 05/08/2019   |
|------------|---|
| 10/26/2020 | Respondent's Exhibit 358 - Picture Of "Community";  |
| 10/26/2020 | Respondent's Exhibit 359 - Email To<br>Teacher From Nurah                                     |
| 10/30/2020 | Fifth Temporary Order   |
| 11/04/2020 | Copy Status Report - Child Advocacy<br>Services - Supervised Access from CPOR<br>CV14-20-9032 |
| 11/05/2020 | Status Report-Therapeutic Service 11/05/2020  |
| 11/06/2020 | Notice of Remote Hearing  |
| 11/06/2020 | Sixth Temporary Order (No Cert)   |
| 11/06/2020 | Notice of Petitioners Choice of Individual<br>Counselor                                       |
| 11/13/2020 | Seventh Temporary Order (Sullivan)  |
| 11/13/2020 | Hearing for Motion on new hearing for child's therapy and sanctions                           |
| 11/15/2020 | Motion to Shorten   |
| 11/15/2020 | WF Proposed Order to Sanction   |
| 11/15/2020 | Motion to New Hearing for Therapist<br>Proposal   |
| 11/15/2020 | Motion and Affidavit to Sanction  |
| 11/17/2020 | Objection to Another Motion for Sanctions and to Hearing for Therapist Proposal               |
| 11/19/2020 | Order to Shorten Time   |
| 11/19/2020 | Order to New Hearing for Therapy  |
| 12/09/2020 | WF-Proposed Order to Continue Trial (No MP)   |
| 12/09/2020 | Motion to Continue Trial  |
| 12/09/2020 | Motion to Shorten   |

| 12/09/2020 |            | Objection to Motion to Continue Trial Due to New Therapist, Adj Schedule, and Enforce Court Orders      |
|------------|------------|---|
| 12/11/2020 |            | Notice of Hearing   |
| 12/11/2020 |            | Order to Shorten Time   |
| 12/13/2020 |            | Copy Status Report - Child Advocacy<br>Services - Supervised Access from CPOR<br>CV14-20-9032           |
| 12/21/2020 | 12/18/2020 | Declaration and Summary of Final<br>Argument Requests – Mirsad  |
| 12/28/2020 |            | Notice of Change of Address- K. Stretch   |
| 01/12/2021 |            | Copy of WF Report - Child Advocacy<br>Services - Summary of Visit (3rd) from<br>CPOR Case CV14-20-9032  |
| 01/13/2021 |            | Declaration on Nurah's Alienation and<br>Therapy for It - Respondent's                                  |
| 01/25/2021 |            | WF Records Request  |
| 01/29/2021 |            | Notice Correcting Info  |
| 01/29/2021 | 01/27/2021 | Partial Satisfaction of Judgment  |
| 01/29/2021 | 01/28/2021 | Notice to Court   |
| 02/04/2021 |            | Declaration About Petitioner's Continuous<br>Child Abust Through Alienation and<br>Abduction            |
| 02/08/2021 |            | Findings of Fact and Conclusions of Law and Order   |
| 02/22/2021 |            | Order for Attorney and Paralegal Fees (no cert)   |
| 02/22/2021 |            | Judgment for Attorney and Paralegal Fees (no cert)  |
| 03/04/2021 |            | Notice of Hearing for Motion to Reconsider  |
| 03/04/2021 |            | Motion and Affidavit to Reconsider Fact<br>Finding, Proposed Final Judgment, Order<br>for Attorney Fees |

| 03/05/2021 | WF Proposed Order for Motion to Amend<br>Findings or Make New (No Cert)                  |
|------------|--|
| 03/05/2021 | Motion and Affidavit to Amend Filings or<br>Make New – Respondent                        |
| 03/08/2021 | Motion to Amend Findings or Make New   |
| 03/09/2021 | Judgment and Decree of Divorce email only cert x1  |
| 03/09/2021 | Certified Copy of Judgment and Decree of Divorce email only cert x1                      |
| 03/09/2021 | Objection to Proposed Order for Final<br>Judgment – Mirsad                               |
| 03/10/2021 | Notice of Remote Hearing   |
| 03/10/2021 | Order Setting Hearing (Email Only)   |
| 03/15/2021 | Partial Satisfaction of Judgment of Attorney<br>Fees for the Amount of \$5               |
| 03/17/2021 | WF Records Request mb  |
| 03/25/2021 | Respondent's Exhibit 356 - Info Re: Rep<br>Brandon Hixon                                 |
| 03/25/2021 | Respondent's Exhibit 356 - Info Re: Rep<br>Brandon Hixon                                 |
| 04/01/2021 | Record Request – CG  |
| 04/01/2021 | WF Report- 4th Supervised Access Report-<br>Child Advocacy Services                      |
| 04/07/2021 | Order Denying Motions for Reconsider,<br>New FoF, New Trial, Granting Amend<br>Judgement |
| 04/07/2021 | Amended Judgment and Decree of Divorce-<br>no MP; Cert x1                                |
| 04/07/2021 | Certified Copy of Amended Judgment and Decree of Divorce- no MP; Cert x1                 |
| 04/07/2021 | Supplemental Order   |
| 04/14/2021 | Notice of hearing re motion for sanctions and contempt (Respondent's)                    |

| 04/14/2021 |            | Motion and Affidavit for Fee Waiver for Supreme Court Appeal (Respondent's)                     |
|------------|------------|---|
| 04/14/2021 |            | Objection to amended final judgment and divorce decree (Respondent's)                           |
| 04/14/2021 |            | WF APPLS/TRANS-Notice of Appeal notarized (Respondent's)  |
| 04/15/2021 |            | Motion for Contempt – Resp  |
| 04/15/2021 |            | Affidavit in Support of Motion for Contempt   |
| 04/16/2021 |            | Notice of Remote Hearing  |
| 04/16/2021 |            | wf Notice of Non-Availability Petn for<br>Hearing   |
| 04/19/2021 |            | Notice of Hearing 5/6/21  |
| 04/19/2021 |            | WF 2nd Memorandum of Attorney and Paralegal Fees  |
| 04/19/2021 |            | Proposed Order of 2nd Order for Attorney & Paralegal Fees & Costs- Email Only; no Cert          |
| 04/19/2021 |            | Proposed Order of 2nd Judgment for<br>Attorney & Paralegal Fees & Costs- Email<br>Only; no Cert |
| 04/22/2021 |            | Notice of Remote Hearing  |
| 04/22/2021 | 04/21/2021 | Motion to Continue  |
| 04/22/2021 |            | Proposed Notice of Hearing for Contempt & Objection Set Aside                                   |
| 04/23/2021 |            | Proposed Order DENIED to Continue   |
| 04/26/2021 |            | Supreme Court Order Conditionally Dismiss<br>Appeal #48757-2021                                 |
| 04/26/2021 |            | SC Received Email re: Order Conditionally Dismissing Appeal                                     |
| 04/26/2021 | 04/25/2021 | Motion for Contempt - 1st – Respondent  |
| 04/26/2021 | 04/25/2021 | Motion for Contempt - 2nd – Respondent  |
| 04/26/2021 | 04/25/2021 | Motion for Contempt - 3rd – Respondent  |
|            |            |   |

| 04/26/2021 | 04/25/2021 | Motion for Contempt - 4th – Respondent  |
|------------|------------|---|
| 04/26/2021 | 04/25/2021 | Affidavit for 2nd Motion for Contempt – Respondent                            |
| 04/26/2021 |            | WF Proposed Order for Motions for<br>Contempt 1 thru 4 (No Cert)              |
| 04/26/2021 | 04/25/2021 | Affidavit for 1st Motion for Contempt – Respondent                            |
| 04/26/2021 | 04/25/2021 | Declaration for Motion for Contempt   |
| 04/26/2021 | 04/25/2021 | Affidavit in Support of 3rd Motion for Contempt – Respondent                  |
| 04/26/2021 | 04/25/2021 | Affidavit for 4th Motion for Contempt – Respondent                            |
| 04/27/2021 |            | Motion to Shorten Time – Resp   |
| 04/27/2021 |            | Motion & Affidavit to Set Aside Judgment                                      |
| 04/28/2021 |            | DENIED Order for Fee Waiver Supreme<br>Court Appeal NO MP, NO CERT PD         |
| 04/29/2021 |            | WF Proposed Order to Set Aside Judgment (no cert)                             |
| 04/29/2021 |            | DENIED- Proposed Order to Shorten Time and Continue Hearing (No Cert)         |
| 04/29/2021 |            | Sent Receipt - Proposed Order Denied to<br>Shorten Time and Continue Hearing  |
| 04/29/2021 |            | Objection to Motion & Affidavit to Set Aside the Judgment- Plaintiff          |
| 04/29/2021 |            | Objection to Five Post-Judgment Motions for Contempt- Plaintiff               |
| 04/29/2021 |            | Response to Objection to Amended Final Judgment & Divorce Decree- Plaintiff   |
| 04/30/2021 |            | Motion to Shorten and Continue Hearing<br>Scheduled 04.29.2021 – Respondent   |
| 04/30/2021 |            | Proposed Order DENIED Re: Motion to<br>Shorten and Continue Hearing (No Cert) |
|            |            |   |

| 04/30/2021 | Motion to Continue Hearing for Contempt & Set Aside Judgment  |
|------------|---|
| 04/30/2021 | WF Proposed order on Motn to Continue -<br>Email Only; no Cert  |
| 04/30/2021 | Motion to Shorten Time for Motion to Continue Hearing   |
| 04/30/2021 | WF Proposed Order of Motion to Shorten<br>Time for Motion to Continue                                     |
| 04/30/2021 | WF Prpsd Order to Shorten Time for<br>Motions for Contempt & to Set Aside<br>Jdgmnt - Email Only; no Cert |
| 04/30/2021 | Memorandum & Affidavit in Support of<br>Objection to Proposed Order for Attorney<br>Fees                  |
| 04/30/2021 | WF Proposed Order for Hearing for Motion for Contempt & to Set Aside- Email Only; no Cert                 |
| 04/30/2021 | Motion to Shorten for Objection for<br>Memorandum & Affidavit of Fees & Costs                             |
| 04/30/2021 | WF Proposed Order of Motion to Shorten for Objection for Mem & Aff of Fees & Costs-Email; no cert         |
| 04/30/2021 | Objection to 2nd Memorandum & Affidavit of Attorney & Paralegal Fees                                      |
| 04/30/2021 | Motion to Shorten Time for Motions for Contempt & Set Aside Judgment                                      |
| 05/03/2021 | Supreme Court Order Dismissing Appeal SC#48757-2021   |
| 05/05/2021 | Proposed- Notice of Hearing   |
| 05/06/2021 | Petitioner's Verfied Motion for Parenting<br>Coordinator  |
| 05/07/2021 | Motion to Shorten Time - Petitioner's   |
| 05/10/2021 | Order Shortening Time w/Zoom Hearing Info 5/20/2021 11:30 am no mp no cert                                |
|            |   |

| 05/10/2021 |            | Order Denying Second Request for Attorney and Paralegal Fees and Costs nomp/nocert             |
|------------|------------|--|
| 05/10/2021 |            | Order Denying Respondent's First Post-<br>Judgment Motion for Contempt<br>Nomp/nocert          |
| 05/14/2021 |            | WF Motion to Clarify Judgment –<br>Respondent  |
| 05/14/2021 |            | WF Motion to Clarify Protection Order – Respondent   |
| 05/14/2021 |            | Proposed Order for Motion to Clarify<br>Judgment No MP No Cert **Hold for<br>Hearing**         |
| 05/14/2021 |            | Proposed Order for Motion to Clarify<br>Protection Order No MP No Cert **Hold for<br>Hearing** |
| 05/14/2021 |            | Motion to Shorten Time for Motions to Clarify – Respondent                                     |
| 05/14/2021 |            | Proposed Notice of Hearing Motion to<br>Clarify – Respondent                                   |
| 05/14/2021 |            | Affidavit in Support of Motion to Clarify<br>Judgment and Protection Order –<br>Respondent     |
| 05/14/2021 |            | WF Notice of Appeal to Supreme Court 4-7-2021 Judgment   |
| 05/14/2021 |            | WF Notice of Appeal to SC 3-9-2021<br>Judgment   |
| 05/17/2021 |            | Motion to Withdraw - Petitioner's  |
| 05/17/2021 |            | Affidavit in Support of Motion for Leave to Withdraw - Petitioner's                            |
| 05/17/2021 |            | Motion to Shorten Time - Petitioner's  |
| 05/17/2021 |            | Proposed Order Granting Leave to<br>Withdraw *Hold for Hearing* mp no cert                     |
| 05/17/2021 | 05/18/2021 | Order Shortening Time  |
| 05/17/2021 | 05/18/2021 | Denied Order for Motion to Shorten Time<br>Respondent  |

| 05/19/2021 | WF Amended Order to Shorten Time   |
|------------|--|
| 05/25/2021 | Supreme Court Order Conditionally<br>Dismissing Appeal                           |
| 05/25/2021 | Record Request – MA  |
| 05/25/2021 | Order Granting Leave to Withdraw as<br>Attorney of Record                        |
| 05/25/2021 | Order Denying Respondent's Motions and Reserving Judgment on Petitioner's Motion |
| 05/25/2021 | Notice of Remote Hearing   |
| 06/04/2021 | WF Notice of Appearance - Jennifer Pro Se  |
| 06/04/2021 | Response to Resp Motion to Clarify the Final Judgment                            |
| 06/11/2021 | Motion for Parenting Coordinator – Jennifer                                      |
| 06/11/2021 | Notice of Hearing - 07.01.2021 - Petitioner's Motion for Parenting Coordinator   |
| 06/15/2021 | Notice of Remote Hearing   |
| 06/15/2021 | Supreme Court Document Filed-Misc  |
| 06/21/2021 | wf Letter Recieved-Child Advocacy Service<br>of The Treasure Valley              |
| 06/22/2021 | Letter - Child Advocacy Services   |
| 06/23/2021 | WF Notice of Appearance - B. O'Neil for Jennifer                                 |
| 06/25/2021 | Objection and Affidavit to Proposed<br>Parenting Coordinator                     |
| 06/25/2021 | Motion and Aff for permissive appeal   |
| 06/25/2021 | Motion shorten coord   |
| 06/25/2021 | Proposed Order for Permissive Appeal NO MP, NO CERT PD **hold for hearing**      |
| 06/25/2021 | Objection to all motions   |
| 06/25/2021 | Proposed Notice of hearing for obj tara permissive coord                         |

| 06/28/2021 | DENIED - Proposed Order for Hearing for short objection NO MP, NO CERT PD                  |
|------------|--|
| 06/30/2021 | WF SEC -Petitioner's Response to Objection and Affidavit to Proposed Parenting Coordinator |
| 07/01/2021 | WF SEC - Respondent's Affidavit and objection on opposing party dishonest claims           |
| 07/01/2021 | Notice of Hearing 7/22/21  |
| 07/07/2021 | Notice of Remote Hearing   |
| 07/09/2021 | Order Appointing Parenting Coordinator – Petitioner  |
| 07/12/2021 | Records Request – CK   |
| 07/16/2021 | Objection to Notice of Hearing on 7/22   |
| 07/23/2021 | Proposed order for mot to tara bosnia cas<br>NO MP, NO CERT PD                             |
| 07/23/2021 | Proposed Notice of hearing for mot to tara cas bosnia                                      |
| 07/23/2021 | Motion shorten tara bosnia cas   |
| 07/23/2021 | Motion and Affidavit for tara bosnia coord writing   |
| 07/23/2021 | Objection on Appointment of Parenting<br>Coordinator-Respondent                            |
| 07/27/2021 | Order Denying Respondent's Motion for Permissive Appeal no mp no cert                      |
| 07/28/2021 | DENIED - Proposed order on Motion to short tara bosnia cas NO MP, NO CERT PD               |
| 07/28/2021 | Mtn to Shorten Time to allow travel  |
| 07/28/2021 | Proposed Order to Allow Travel Hold for<br>Hearing   |
| 07/28/2021 | Proposed Notice of hearing   |
| 07/29/2021 | Notice of Remote Hearing 8.5.21  |
| 08/04/2021 | Received Email from SC Re: Order Denying   |

| 08/04/2021 |            | Supreme Court Order Denying Motion to<br>Stay and Continue Appeal #48816-2021                        |
|------------|------------|--|
| 08/05/2021 |            | Notice of Deprivation and Trespass Upon<br>Rights CF.18 USC Section 242-Respondent                   |
| 08/05/2021 |            | Notice of Motion Trespass Upon Rights Are<br>Committed Inside This Court-Respondent                  |
| 08/05/2021 |            | Notice to Court Objection Trespass Upon<br>Rights-Respondent   |
| 08/06/2021 | 08/09/2021 | Order Appointing Parenting Coordinator<br>Amended  |
| 08/09/2021 |            | Order Appointing Parenting Coordinator-<br>Amended   |
| 08/13/2021 |            | Motion & Affidavit Objecting to Order Appointing Parenting Coordinator                               |
| 08/16/2021 |            | Motion to Shorten Time on Motion & Affidavit Objecting to Order Appointing Parenting Coordinator     |
| 08/16/2021 |            | WF Proposed Order for Motion Objecting to<br>Appointment of Parenting Coordinator NO<br>CERT         |
| 08/16/2021 |            | Proposed Other Document Requiring Court<br>Signature Notice of Hearing                               |
| 08/16/2021 |            | Order Setting Case   |
| 08/16/2021 |            | Proposed Order Denied Order to Shorten<br>Time   |
| 08/18/2021 |            | Objection to Motion and Affidavit Objecting to Prop Order Appoint Parent Coordinator, etc-Petitioner |
| 08/23/2021 |            | Status Report - Parenting Coordination<br>Compliance Report  |
| 08/24/2021 |            | Motion to Allow Travel with Children **Hold for Hearing**  |
| 08/24/2021 |            | Declaration in Support of Motion to Travel   |
| 08/24/2021 |            | Motion to Shorten Time   |

| 08/24/2021 | Affidavit in Support of Motion to Shorten Time                                     |
|------------|--|
| 08/25/2021 | Order to Shorten Time  |
| 08/25/2021 | Notice of Remote Hearing 8.26.21   |
| 08/26/2021 | Notice to Court Change of Venue – Respondent                                       |
| 08/26/2021 | Motion to Shorten Time – Respondent  |
| 08/26/2021 | Petition for Non-Statutory Writ of Habeas<br>Corpus – Respondent                   |
| 08/26/2021 | Notice of Motion Objection Demand<br>Dismissal of All Motions – Respondent         |
| 08/26/2021 | Affidavit of Conflict of Interest –<br>Respondent                                  |
| 08/26/2021 | Notice to Court Demanding a Trial by Jury – Respondent                             |
| 08/26/2021 | Objection to Motion to Allow Travel – Respondent                                   |
| 08/26/2021 | Motion & Affidavit for Contempt – Respondent                                       |
| 08/26/2021 | Notice of Remote Hearing 9.03.21   |
| 08/26/2021 | Proposed Order Denied to Shorten Time  |
| 08/26/2021 | Notice of Motion to Dismiss with Prejudice   |
| 08/26/2021 | Notice of Appeal of Order for Parenting<br>Coordinator                             |
| 08/27/2021 | Motion to Shorten Time - Respondent's  |
| 08/27/2021 | Transcript Request – CG  |
| 08/27/2021 | Proposed Order to Shorten Time Denied  |
| 08/27/2021 | Order for Referral to Administrative Judge for a Declaration of Vexatious Litigant |
| 08/27/2021 | Notice of Estimate of Transcript Cost  |
| 08/31/2021 | Received Receipt re; estimate  |
| 08/31/2021 | Motion to Shorten Time – Resp  |
|            |  |

| 08/31/2021 |            | Motion and Affidavit to Restart Visits - Respondent **Hold for Hearing**                                   |
|------------|------------|--|
| 09/01/2021 |            | Declaration Re:Parenting Coordinator-<br>Petitioner  |
| 09/02/2021 |            | Motion and Affidavit for Contempt 1  |
| 09/02/2021 |            | WF Proposed Order for Contempt no cert   |
| 09/02/2021 |            | Notice of Objection and Demand for Clarification of Evidence   |
| 09/02/2021 |            | Notice of Motion Demanding Response  |
| 09/02/2021 |            | Notice of Demand for Dismissal   |
| 09/02/2021 |            | Motion and Affidavit for Contempt 2  |
| 09/02/2021 |            | Affidavit in Objection to Petitioner's Declaration   |
| 09/02/2021 |            | Proposed Order Denied to Shorten Time – Respondent   |
| 09/03/2021 |            | Order Denying Objection to Parenting<br>Coordinator – Petitioner   |
| 09/05/2021 |            | Affidavit to Support Objection to<br>Appointment of Parenting Coordinator –<br>Respondent                  |
| 09/05/2021 |            | Objection to Referral to Admin Judge – Respondent  |
| 09/05/2021 |            | WF Proposed Notice of Hearing  |
| 09/13/2021 |            | Order on Request for Hearing   |
| 09/14/2021 |            | Supreme Court Order Denying Motion for Appeal by Permission SC #49044-2021                                 |
| 09/30/2021 | 09/29/2021 | Affidavit in Objection to Courts Denial of Hearing and Demand of Written Response - Respondent's           |
| 10/06/2021 |            | Supreme Court Document - Order Re:<br>Affidavit with Notice of Appeal and<br>Objection to Denied Permissiv |
| 10/13/2021 | 10/14/2021 | Notice of Remote Hearing   |

| 10/14/2021 |            | Order Order Re: Affidavit in Objection and Order of Review                           |
|------------|------------|--|
| 10/21/2021 |            | Motion & Affidavit for Contempt  |
| 10/21/2021 |            | Motion to Shorten Time   |
| 10/22/2021 |            | Response RE Review of Parenting<br>Coordinator                                       |
| 10/26/2021 |            | Affidavit in Objection to Response to Review for Parenting Coordinator               |
| 10/26/2021 |            | Affidavit on Grievance Against Mr Sullival with Judiciary Board and Bar              |
| 10/27/2021 |            | Affidavit on bar grievance against Mr<br>Sullivan for child abuse and mental torture |
| 10/27/2021 |            | Order to Shorten Time DENIED   |
| 11/02/2021 |            | NOH - 1st Motn of Contempt 11/18/21 – Respondent                                     |
| 11/03/2021 | 10/27/2021 | Affidavit of Status – Respondent   |
| 11/03/2021 | 10/27/2021 | Notice of Claim – Respondent   |
| 11/03/2021 | 10/27/2021 | Petition to Appellate Court for Writ Of<br>Mandamus – Respondent                     |
| 11/05/2021 |            | Notice of Remote Hearing   |
| 11/11/2021 | 11/08/2021 | Motion to Shorten Time - Respondent's  |
| 11/11/2021 |            | WF Proposed - Notice of Hearing on<br>Motions - Respondent's                         |
| 11/11/2021 |            | WF Proposed Order for Compensation no cert   |
| 11/11/2021 | 11/08/2021 | Motion and Affidavit for Sanctions – Respondent's                                    |
| 11/11/2021 | 11/08/2021 | Notice of Special Appearance – Respondent's  |
| 11/11/2021 | 11/08/2021 | Motion & Affidavit to Clarify the Amended Final Judgment - Respondent's              |

| 11/12/2021 |            | Motion and Affidavit for Contempt – Respondent  |
|------------|------------|---|
| 11/15/2021 |            | Proposed Order DENIED Shortening Time   |
| 11/15/2021 |            | Objection and Affidavit RE Rescheduling<br>Hearing – Respondent                                       |
| 11/16/2021 |            | Motion to Vacate and Reset Hearing –<br>Petitioner  |
| 11/16/2021 |            | Affidavit ISO Motion to Vacate and Reset<br>Hearing   |
| 11/16/2021 |            | Affidavit ISO Motion to Vacate and Reset<br>Hearing   |
| 11/16/2021 |            | Zoom Supplemental J. Sullivan   |
| 11/16/2021 |            | Order Vacating and Resetting Hearing no cert  |
| 11/16/2021 |            | Notice of Hearing - Respondent's 2nd<br>Motion for Contempt   |
| 11/18/2021 |            | Motion to Shorten Time  |
| 11/18/2021 |            | Affidavit about Court's Mistake to Schedule Hearing   |
| 11/18/2021 | 11/19/2021 | WF Proposed Order DENIED to Shorten Time no cert  |
| 11/18/2021 |            | Notice of Hearing - Amended - Urgnt Motn to Restart, 2nd Motn for Contempt, Motn for Sanctions        |
| 11/18/2021 |            | Motion & Affidavit for Contempt -<br>Amended – Respondent   |
| 11/19/2021 |            | Not Guilty Plea & Request for Trial –<br>Petitioner   |
| 11/22/2021 |            | Affidavit with Objection to Writ of Plea,<br>Challenging Personal Jurisdiction and<br>Notice of Claim |
| 11/22/2021 |            | Affidavit in Support of 1st & 2nd Motions for Contempt Describing Indicators of Parental Alienation   |

| 11/23/2021 | Objection to Motn & Affidavit to Clarify the Amended Final Judgment from 4-7-2021 RE: Holidays, ETC. |
|------------|--|
| 11/24/2021 | Notice of Remote Hearing 11.29.21  |
| 11/24/2021 | Order Setting Case and Scheduling Order  |
| 11/26/2021 | Notice of Motion/Objection/Demand/<br>Dismissal-Respondent's   |
| 11/26/2021 | Affidavit in Verification of Earlier<br>Affidavits - Respondent's                                    |
| 11/26/2021 | Affidavit Rebutting Opposing Party<br>Objection - Respondent's                                       |
| 11/29/2021 | Notice of Appearance of Non Bar Counsel  |
| 11/29/2021 | Affidavit RE Rebutting Opposing Party<br>Objection – Amended   |
| 11/29/2021 | Motion and Affidavit RE Vaccine  |
| 11/29/2021 | Motion to Shorten Time   |
| 11/29/2021 | WF Proposed Order to Shorten Time no cert  |
| 12/01/2021 | Order on Motion to Clarify Judgment  |
| 12/03/2021 | Order on Motion to Shorten Time to Hear Motion & Affidavit RE: Vaccine                               |