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IN THE DISTRICT COURT IN FOR TULSA COUNTY  
STATE OF OKLAHOMA



[Redacted]

Petitioner,

vs.

[Redacted]

Respondent.

JUN 29 PM 4:35  
DON NEWBERRY  
COURT CLERK

[Redacted]

DISTRICT COURT  
FILED  
JUN 29 2017  
DON NEWBERRY, Court Clerk  
STATE OF OKLA. TULSA COUNTY

**EXPEDITED MOTION TO MODIFY VISITATION**

COME NOW the Petitioner, [Redacted], and move this Court for an Expedited Order modifying visitation between the Respondent and the minor child. In support of this Motion, the Petitioner offers the following:

1. That this Court has continuing jurisdiction over the parties hereto, the minor child, and the subject matter hereof.
2. That this Court has continuing jurisdiction concerning the minor child, B.E. E., born 09/06/2006. More particularly, under the Uniform Interstate Family Support Act, 43 O.S. §601-101 et seq., and under the law of this state, which grants this Court jurisdiction to modify existing child visitation orders, this Court has such child support jurisdiction and the same should be exercised herein.
3. The District Court of Tulsa County sustained an Emergency Motion to Modify Custody of the minor child, B.E. E., born 09/06/2006 on May 11, 2016. Subsequent to the hearing the Parties entered into an Agree Order of Modification setting forth the visitation between the Respondent and the Minor child, as well as, certain provisions on who could be present with minor child.

4. This matter was set on March 23, 2017 for the Court to determine child support arrearage, and determine the judgment amount for past child support, day care and medical. Further, Respondent has not provided the documentation as ordered.

5. Specific in the Order was a provision that Respondent's current boyfriend, Mr. Stefani would not be around the child. He has criminal history for armed robbery and the Court had previously sustained an Emergency Application dealing with his contact.

6. Subsequent to the December 2016 visitation, Petitioner left the jurisdiction of Oklahoma and is believed to be residing in Colorado.

7. Petitioner has issued discovery to the Respondent requesting information on residence, work history, and requesting the names of other individuals who have been present when the Respondent has the minor child.

8. Respondent violated the December 5, 2016 Order and allowed the minor to have contact with Mr. Stefani.

9. Mr. Stefani is believed to be a twice convicted felon, involving Bank Robbery and has new charges. The Respondent has claimed she is now married to him. Further, several social media posts have been published utilizing the minor child's photographs by Mr. Stefani.

10. The Respondent has taken the minor child against agreements of the parties in the past.

11. More particularly, under the Uniform Interstate Family Support Act, 43 O.S. §601-101 et seq., and under the law of this state, which grants this Court jurisdiction

to modify existing child support orders, this Court has such child support jurisdiction and the same should be exercised herein.

12. It is in the best interest of the minor child to not have extended visitation with the Respondent out of this state.

WHEREFORE, premises considered, the Petitioner and the Respondent respectfully pray this Court for an order modifying the Child Custody Order.

Respectfully submitted,



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918.584.2430 Facsimile  
Attorney for Petitioner

VERIFICATION

STATE OF OKLAHOMA     )  
  ) ss.  
COUNTY OF TULSA     )

Donald Lee Evans, III, being first duly sworn upon his oath, states:

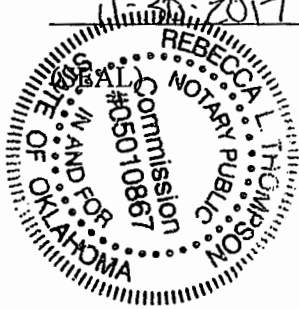
That he is the Petitioner above named; that he has read the above and foregoing document and knows the contents thereof, and that the statements, allegations and facts therein set forth are true and correct to the best of his information, knowledge and belief.



Subscribed and sworn to before me this 29<sup>th</sup> day of June, 2017.

Rebecca L. Thompson  
Notary Public


My Commission Expires: 11/30/2017



CERTIFICATE OF MAILING

I, Max C. Myers, do hereby certify that on the 29<sup>th</sup> day of June 2017, a true and correct copy of the above and foregoing document was mailed via United States Postal Service, certified/return receipt requested, with the proper postage prepaid thereon, as follows:

Stuart Ericson, Esq.  
115 West 3<sup>rd</sup>  
Suite 417  
Tulsa, OK 74103  
Attorney for Respondent



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Max C. Myers