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FILED BY CLERK
KS. DISTRICT COURT
THIRD JUDICIAL DIST
MAY 28 8 59 AM '99
GENERAL JURISDICTION
TOPEKA, KANSAS

IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS
DIVISION 12

In the Matter of the Marriage of

HAL RICHARDSON
and
CLAUDINE DOMBROWSKI

Case No. 96 D 217

**MOTION TO ADVANCE HEARING ON RESPONDENT'S
OBJECTIONS TO CASE MANAGER RECOMMENDATIONS**

COMES NOW the Petitioner, Hal Richardson, by and through counsel, Donald R. Hoffman, and respectfully moves the Court to advance the hearing on Respondent's Objections to the Case Manager Recommendations.

In support thereof, the Court is shown:

1. This matter was fully and finally adjudicated in the Appellate Courts on December 12, 1998.
2. This Court ordered the Respondent to return the child to the Topeka area. The case manager reaffirmed the order on March 2, 1999. Respondent has appealed.
3. Respondent has steadfastly refused to return the child or to make arrangements to return. Respondent has refused to comply with the supervised visitation (Safe Visit Program Topeka YMCA) even though she agreed to do so during meetings with the case manager. Respondent has apparently been advised by her own counsel to ignore this agreement.
4. Petitioner has been denied visitation with the child as a result of the conduct and delay of Respondent.
5. Petitioner is concerned that Respondent will leave the jurisdiction with the child. This has also been the concern of the Guardian ad Litem and others involved in the case.

6. It is unreasonable for the matter to be delayed for further proceedings until July, 1999. Counsel for both parties are established in law firms where other members can assist in meeting court appearances. The Court should advance the hearing forthwith.

WHEREFORE, movant prays the court advance the above hearing date, order compliance with the agreement concerning interim visitation, direct Respondent to return to Topeka or in the alternative, grant custody to Petitioner per the Court's order.



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CERTIFICATE OF SERVICE

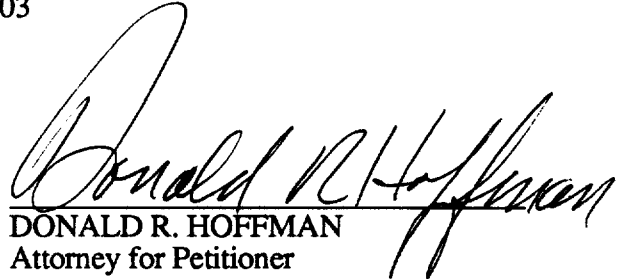
I hereby certify that on the 28th day of May, 1999, the above and foregoing Motion to Advance Hearing on Respondent's Objections to Case Manager Recommendations was faxed to:

Rebecca A. King
 RILING, BURKHEAD & NITCHER, CHTD.
 808 Massachusetts
 P.O. Box B
 Lawrence, KS 66044

Harry Moore
 Case Manager
 Shawnee County Court Services
 Shawnee County Courthouse
 200 S.E. 7th Street
 Topeka, Kansas 66603

and a chamber copy hand delivered to:

Honorable James Buchele
District Court Judge - Division 12
Shawnee County Courthouse
200 S.E. 7th Street
Topeka, Kansas 66603


DONALD R. HOFFMAN
Attorney for Petitioner