

ME

Donald R. Hoffman (Ks. 07332)
Jason P. Hoffman (Ks. 17637)
HOFFMAN & HOFFMAN
CoreFirst Bank & Trust Building
100 E. 9th Street – 3rd Floor East
Topeka, Kansas 66612
Ph. (785) 233-5887
Fax (785) 233-2173

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IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS

DW4

In the Matter of)
)
HAL RICHARDSON,)
Petitioner,)
and)
)
CLAUDINE DOMBROWSKI,)
Respondent.)
_____)

Case No. 96-D-217

MOTION FOR ORDER TO APPEAR & SHOW CAUSE

COMES NOW the petitioner above named, by and through counsel Donald R. Hoffman, Hoffman & Hoffman, and moves the Court for an Order directing respondent to show cause why she should not be found in contempt of the Court's Order of September 27, 2006. Further, petitioner prays the Court for an Order finding respondent in contempt and directing her to remove any images of the parties' minor child from the Web and for an Order assessing petitioner's attorney fees for the preparation and prosecution of the instant motion

In support thereof, the Court is shown:

1. The Court directed respondent to remove all pictures of the parties' minor child from her website on September 27, 2006;

2. A cursory Google search of respondent's name discloses that respondent maintains a myspace.com account¹. The URL for the account is www.myspace.com/firesheart. A number of links on respondent's myspace.com page are to various pictures of the parties' minor child. Notably, the link:
<http://www.slide.com/r/89V7tcZj6DtKrxfhvfnOtitOfDTgFtE?view=large> redirects the user to the external website slide.com and to "Claudine & Rikki's Slide Show". There appear to be 78 images on this webpage, the majority of which are of the parties' minor child.
3. There are links to several other slide shows on the slide.com page created by respondent entitled "Class of 2013", "Untitled" and "4-21-2007 School Carnival" that contain an additional 33 images of the parties' minor child.
4. Finally, when the link to "angelfury" (respondent's screen name on her slide.com page) is opened, a slide show is presented featuring pictures of the parties' minor child.
5. While respondent's website- AngelFury.org² –does not contain pictures of the parties minor child, pages maintained by respondent certainly do. Clearly, respondent has not acted in conformity with the Court's directive with respect to maintaining pictures of the parties' minor child on the Web. As a result,

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<http://profile.myspace.com/index.cfm?fuseaction=user.viewprofile&friendID=70664122>

The name on respondent's myspace.com account is "AngelFury".

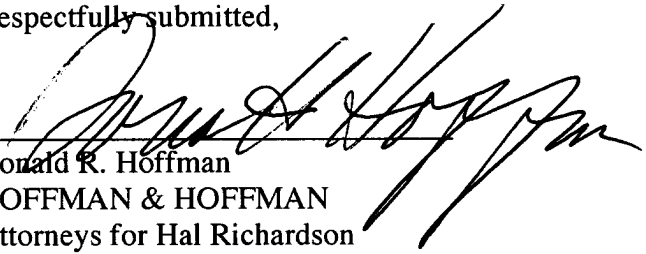
² Angelfury.org is a web site that is "under construction" the home page of which contains a dialogue box attributed to respondent. The link at the bottom of the home page to Claudine Dombowski's e-mail identifies her e-mail address as AngelFury@AngelFury.org.

respondent should be required to show cause why she should not be held in contempt.

6. Further, petitioner's attorney fees for the preparation and prosecution of the instant motion should be assessed against respondent.

WHEREFORE, petitioner prays the Court enter an Order directing respondent to appear and show cause why she should not be held in contempt of Court; for an Order finding respondent in contempt and directing her to remove any images of the parties' minor child from the Web; for an Order assessing petitioner's attorney fees for the preparation and prosecution of the instant motion and for such and other further relief as the Court deems just and equitable under the circumstances.

Respectfully submitted,


Donald R. Hoffman
HOFFMAN & HOFFMAN
Attorneys for Hal Richardson

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 13 day of Feb 2008, a true and correct copy of the above and foregoing document was deposited in the United States

Mail, first class, postage prepaid, addressed to the following:

Claudine Dombrowski, Pro Se
P.O. Box 4974
Topeka, KS 66604

Jill Dykes, Esq,
1243 SW Topeka Blvd.
Topeka, KS 66612


Donald R. Hoffman
HOFFMAN & HOFFMAN
Attorneys for Hal Richardson