

VIRGINIA:

**IN THE JUVENILE AND DOMESTIC RELATIONS
COURT OF LOUDOUN COUNTY**

**IN RE: LIAM SMITH.
DOB 7/22/97**

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Case No. _____

MOTION FOR A RULE TO SHOW CAUSE

COMES NOW the Petitioner Wesley C. Smith ("the Father"), by counsel, and moves this Honorable Court for issuance of a Rule to Show Cause directing the Respondent Cheri Smith ("the Mother") to appear and show cause why she should not be found in contempt for violating the terms of this Court's Order entered May 13, 2003 ("the Order"), and in support of this Motion states under oath as follows:

1. Pursuant to the terms of the Order, the Mother was precluded from denying the Father access to the Child on the days which visitation with the Father was not scheduled, and preventing the Child from spending time with the Father if the Child so desired.
2. The Order further provides the Mother must refrain from "taking any action, making any communication or otherwise interfering with" the Father's exercising visitation with the Child.
3. The Order was based on evidence before the Court that the parties continued to cohabit.
4. A copy of the Order is attached hereto and incorporated herein as Exhibit A.
5. On or about June, 2003 the Mother left the marital residence with the Child and relocated to the home of Mr. and Mrs Day, local neighbors of the parties.
6. The Father has been served with a trespass notice and is therefore forbidden from going to the residence of Mr. and Mrs. Day pursuant to Virginia Code § 18.2-119.

7. The Mother has since stated that she has relocated to an apartment at an unknown address.
8. The Mother's actions therefore operate to deny the Father access to the Child in violation of the Order.
9. The Mother has further rescheduled important meetings related to the Child's special needs during the Father's visitation times in an effort to decrease his time with the Child.
10. The Mother's actions are in willful and direct violation of the Order, and will permanently damage the relationship between the Child and the Father.
11. The Mother's actions are such that they require immediate sanction by this Court.

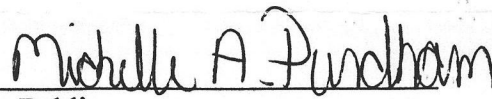
WHEREFORE, the Father moves this Honorable Court for entry of an Order for Rule to Show Cause compelling the Mother to appear and show cause why she should not be found in contempt, that an appropriate sanction be imposed on the Mother by the Court, for ~~an award of~~ ^{US} ~~attorneys' fees and costs expended~~, and for such other relief as the Court may deem appropriate.



WESLEY C. SMITH

COMMONWEALTH OF VIRGINIA
COUNTY OF LOUDOUN, to-wit: Prince Wm

Subscribed and sworn to before me by Wesley C. Smith on this 13th day of ^{June} ~~March~~, 2003.



Notary Public

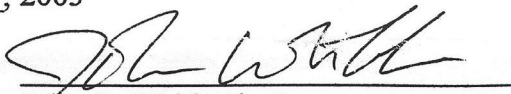
My Commission Expires: 11-30-2003



John C. Whitbeck, Jr., Esquire
Kazem, Whitbeck, Seck & Kazem, PLC
15-D Loudoun Street, SW
Leesburg, Virginia 20175
(703) 777-1795
(703) 777-9079 facsimile
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this Motion was delivered *via first class mail*, to
Loretta Vardy, Esquire, Esquire, 8657 Point of Woods Drive, Manassas, Virginia 22110-6334,
this 13 day of June, 2003


John C. Whitbeck, Jr.

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IN THE JUVENILE AND DOMESTIC RELATIONS
COURT OF PRINCE WILLIAM COUNTY

IN RE: LIAM SMITH.

DOB: 7/22/97

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PRAECIPE

THE CLERK will kindly add the address listed below to the Motion for Rule to

Show Cause previously filed herein, for service of said Motion on the Respondent:

Cheri Smith
SAIC
1710 SAIC Drive
McLean, Virginia 22102


Respectfully submitted,
WESLEY C. SMITH
by Counsel



John C. Whitbeck, Jr., Esquire
Kazem, Whitbeck, Seck & Kazem, PLC
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Leesburg, VA 20175
(703) 777-1795
(703) 777-9079 (Facsimile)
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this pleading was sent via facsimile and first-class mail, this 20 day of June, 2003, to Loretta Vardy, Esquire 12388 Silent Wolf Drive, Manassas, Virginia 20112-7524, counsel for Respondent.


John C. Whitbeck, Jr.