

Index of Record - Case # D112333



Document

1 .	Signed Order of the Court	08/15/1996
2 .	Service, Financial, Supp, Return Serv	08/15/1996
3 .	Service, Financial, Supp, Return Serv	08/15/1996
4 .	Preliminary Injunction	08/15/1996
5 .	Opening Document in Case J1	08/15/1996
6 .	Signed Order of the Court	08/16/1996
7 .	Miscellaneous Filing	08/21/1996
8 .	Acceptance of Service	08/26/1996
9 .	Answer or Resp Pleading, Reply, or	08/28/1996
10 .	Fee, Fine, Bond, Restitution, Service	08/28/1996
11 .	Service, Appeal, Hearing, Depo, Change	08/28/1996
12 .	Service, Appeal, Hearing, Depo, Change	08/28/1996
13 .	Miscellaneous Filing	08/30/1996
14 .	Signed Order of the Court	09/25/1996
15 .	Service, Financial, Supp, Return Serv	09/27/1996
16 .	Minute Entry	10/01/1996
17 .	Fact Sheet for Support Information	10/07/1996
18 .	Signed Order of the Court	10/07/1996
19 .	Signed Order of the Court	10/07/1996
20 .	Stipulation in Any Case	10/07/1996
21 .	Cert Recpt, Return Mail, Letter IN/OUT	10/15/1996
22 .	Any type of Assignment	10/17/1996
23 .	Cert Recpt, Return Mail, Letter IN/OUT	11/04/1996
24 .	Signed Order of the Court	11/13/1996
25 .	Motion in Any Case	01/14/1997
26 .	Service, Appeal, Hearing, Depo, Change	02/06/1997
27 .	Stipulation in Any Case	02/13/1997
28 .	Stipulation in Any Case	03/05/1997
29 .	Motion in Any Case	05/07/1997
30 .	Service, Appeal, Hearing, Depo, Change	05/08/1997
31 .	Opposition to Something in any Case	07/06/1997
32 .	Answer or Resp Pleading, Reply, or	07/08/1997
33 .	Minute Entry	07/09/1997
34 .	Motion in Any Case	07/09/1997
35 .	Motion in Any Case	07/09/1997

Index of Record - Case # D112333



Document

36 .	Answer or Resp Pleading, Reply, or	07/11/1997
37 .	Opposition to Something in any Case	07/11/1997
38 .	Minute Entry	07/14/1997
39 .	Pre Trial Statement	08/01/1997
40 .	Minute Entry	08/04/1997
41 .	Minute Entry	08/05/1997
42 .	Signed Order of the Court	08/11/1997
43 .	Signed Order of the Court	08/11/1997
44 .	Signed Order of the Court	08/11/1997
45 .	Decree in Domestic Case	08/11/1997
46 .	Fact Sheet for Support Information	08/11/1997
47 .	Cert Recpt, Return Mail, Letter IN/OUT	08/12/1997
48 .	Cert Recpt, Return Mail, Letter IN/OUT	08/14/1997
49 .	Cert Recpt, Return Mail, Letter IN/OUT	08/18/1997
50 .	Cert Recpt, Return Mail, Letter IN/OUT	09/03/1997
51 .	Service, Financial, Supp, Return Serv	12/03/1998
52 .	Petition in Any Case	12/03/1998
53 .	Signed Order of the Court	12/03/1998
54 .	Fee, Fine, Bond, Restitution, Service	12/03/1998
55 .	Signed Order of the Court	12/08/1998
56 .	Motion in Any Case	12/08/1998
57 .	Miscellaneous Filing	12/15/1998
58 .	Signed Order of the Court	12/15/1998
59 .	Minute Entry	12/17/1998
60 .	Service, Financial, Supp, Return Serv	12/24/1998
61 .	Miscellaneous Filing	12/30/1998
62 .	Minute Entry Order	12/30/1998
63 .	Fee, Fine, Bond, Restitution, Service	01/21/1999
64 .	Signed Order of the Court	01/21/1999
65 .	Parents Worksheet for Support	01/21/1999
66 .	Service, Financial, Supp, Return Serv	01/21/1999
67 .	Petition in Any Case	01/21/1999
68 .	Signed Order of the Court	01/25/1999
69 .	Service, Financial, Supp, Return Serv	02/04/1999
70 .	Service, Financial, Supp, Return Serv	02/18/1999

Index of Record - Case # D112333



Document

71 .	Petition in Any Case	02/18/1999
72 .	Fee, Fine, Bond, Restitution, Service	02/18/1999
73 .	Fee, Fine, Bond, Restitution, Service	02/22/1999
74 .	Signed Order of the Court	02/22/1999
75 .	Motion in Any Case	02/22/1999
76 .	Signed Order of the Court	02/25/1999
77 .	Fee, Fine, Bond, Restitution, Service	02/25/1999
78 .	Service, Appeal, Hearing, Depo, Change	02/26/1999
79 .	Service, Financial, Supp, Return Serv	03/01/1999
80 .	Stipulation in Any Case	03/01/1999
81 .	Service, Financial, Supp, Return Serv	03/16/1999
82 .	Stipulation in Any Case	03/16/1999
83 .	Minute Entry	03/18/1999
84 .	Answer or Resp Pleading, Reply, or	03/29/1999
85 .	Confirmation on OSC Hearing	04/01/1999
86 .	Minute Entry	04/07/1999
87 .	Minute Entry	04/13/1999
88 .	Service, Financial, Supp, Return Serv	04/29/1999
89 .	Minute Entry	05/05/1999
90 .	Signed Order of the Court	05/06/1999
91 .	Signed Order of the Court	05/06/1999
92 .	Motion in Any Case	05/12/1999
93 .	Miscellaneous Filing	05/12/1999
94 .	Opposition to Something in any Case	05/17/1999
95 .	Signed Order of the Court	05/18/1999
96 .	Minute Entry	06/03/1999
97 .	Signed Order of the Court	08/11/1999
98 .	Signed Order of the Court	08/19/1999
99 .	Signed Order of the Court	10/12/1999
100 .	Miscellaneous Filing	02/14/2000
101 .	Service, Appeal, Hearing, Depo, Change	08/22/2001
102 .	ORDER & NOTICE TO WITHHOLD INCIOME FOR CHILD SUPPORT	10/04/2002
103 .	Notice Re: Reassignment	06/12/2012

ARIZONA SUPERIOR COURT, PIMA COUNTY

FILED

<p>In re the Marriage of: TAMMY LYNN FLORES, Petitioner, and ROBERT STEWART FLORES, Respondent.</p>	<p>No. D 112333 96 AUG 15 PM 4:23 REQUEST FOR ORDER TO SHOW CAUSE HEARING DATE Assigned To Judge Pro Tempore Quigley JAMES H. CORBETT CLERK SUPERIOR COURT BY <i>[Signature]</i></p>
--	---

It is hereby requested that the Order to Show Cause filed with the Clerk of Court on August 15, 1996 be set for hearing.

1. Type of Order to Show Cause:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Pre-Judgment | <input type="checkbox"/> Provisional Remedy |
| <input type="checkbox"/> Post-Judgment | <input type="checkbox"/> Supplemental Proceedings |
| <input type="checkbox"/> Other _____ | |

2. Previous matters were heard by Judge/Commissioner _____.

3. Estimated time for the ENTIRE hearing: 1 HOUR

4. Court Reporter required Yes No

5. Relief sought:

- | | |
|---|--|
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Temporary Restraining Order |
| <input type="checkbox"/> Injunction | <input type="checkbox"/> Modification |
| <input type="checkbox"/> Special Action | <input type="checkbox"/> Decree, Support, etc. |
| <input type="checkbox"/> Appoint Receiver | <input type="checkbox"/> Child Custody |
| <input type="checkbox"/> Wage Assignment | <input type="checkbox"/> Possession |

Other Temporary custody, child support & spousal maintenance

6. The opposing party is represented by _____.

I hereby consent to the Order to Show Cause being heard by a Commissioner.

Jean Moskow, Esq.
 BUTLER & STEIN, P.C.
 110 S. Church Ave.
 Suite 9300
 Tucson, Arizona 85701
 (602)628-1618
 PCC: 64512

Date: August 15, 1996.

[Signature]

 Attorney for Petitioner

M-0

ARIZONA SUPERIOR COURT, PIMA COUNTY

In re the Marriage of: TAMMY LYNN FLORES, and ROBERT STEWART FLORES, Respondent.	NO. D 112333 SPOUSE'S FINANCIAL AFFIDAVIT <input type="checkbox"/> As of date of order sought to be modified <input checked="" type="checkbox"/> Current Assigned To Judge Pro Tempore Quigley.	FILED 86 AUG 15 PM 4:24 JAMES H. CORBETT CLERK SUPERIOR COURT BY <i>[Signature]</i> DEPUTY <i>Keith Ylarska</i>
--	---	--

NAME: TAMMY LYNN FLORES BIRTHDATE: 2-4-64
 ADDRESS: 6280 South Campbell #44104 SSN: [REDACTED]
Tucson, Arizona 85706

NECESSARY MONTHLY EXPENSES	
For yourself & minor child(ren) residing with you.	
Housing (rent/mtg):	470.00
Repair/Upkeep:	_____
Utilities:	_____
Electricity	100.00
Gas	_____
Water	_____
Phone	65.00
Garbage	_____
Food & Household Supplies:	200.00
Work/School Lunch:	50.00
Medical, dental, drugs, supplies:	10.00
Insurance not deducted from pay:	_____
Clothing:	100.00
Laundry/Dry Cleanings:	_____
Child Care/Sitter:	120.00
Support paid for spouse and/or minor children of prior marriage:	_____
Car Repair/Maint.	75.00
Car Insurance	35.00
Gas/Oil	40.00
License	25.00
Bus/Taxi Fares	_____
Other: <u>Misc.</u>	50.00
_____	_____
_____	_____
TOTAL MONTHLY EXPENSES.....	\$ 1340.00

OTHER MONTHLY PAYMENTS		
Creditor	Balance	Payment
Firestone	\$ 331.55	\$ 15.00
Macy's	\$ 382.00	\$ 20.00
Chase Visa	\$ 923.66	\$ 18.00
Texaco	\$ 119.67	\$ 20.00
Chevron	\$ 232.33	\$ 52.00
Total from Page 3		\$ 166.00
TOTAL MONTHLY PAYMENTS.....		\$ 291.00
TOTAL MONTHLY EXPENSES/PAYMENTS. \$1631.00		
GROSS PAYCHECK (YTD AVERAGE).... \$ <u>unemployed</u>		
[check one]		
<u>weekly</u> x 4.3	<input type="checkbox"/> twice mo. x 2	
<input checked="" type="checkbox"/> monthly	<input type="checkbox"/> every 2 wks x 2.16	
GROSS MONTHLY INCOME..... \$ _____		
GROSS PAYCHECK (current)..... \$ _____		
Less:		
Federal Taxes	\$ _____	
State Taxes	_____	
FICA	_____	
Credit Union	_____	
Insurance	_____	
Union Dues	_____	
Savings, etc.	_____	
Other:	_____	
<u>Medicare</u>	_____	
Total deductions.....		\$ _____
Net Paycheck..... \$ _____		
OTHER MONTHLY INCOME		
Pension/Retirement		\$ _____
Social Security/SSI		_____
Dividends/Interest		_____
GA/AFDC		_____
Rec'd. for minor child(ren not of this marriage under your care		_____
Other: <u>Disability</u>		678.00
_____		_____
TOTAL OTHER INCOME.....		\$ 678.00

Computer No. _____

M-0

Present Occupation: unempl Starting Date: _____

Name, address, phone of present employer: _____

Prior Occupation: Patient Care Associate Starting Date: 12-29-95
Monthly pay: \$800.00 Ending Date: 07-26-96

Name, address, phone number of prior employer: St. Mary's Hospital, 1601 W. St. Mary's
Tucson, Arizona 85706

If not employed, why? was fired - and am on disability

Do you expect to work? Yes If so, when? ASAP Anticipated Occupation: Cashier

Name(s) and age(s) of minor child(ren) residing with you: Casey Alexander Flores 9 years
Dakota Bryan Flores 4 years

Are you or your spouse pregnant? Yes no If yes, estimated deliver date: _____

Physical defect or organic disease suffered by you or your minor children: None

List all bank accounts, including checking, savings, credit union, certificates of deposit, in your name, in name of both spouses, or in which you have an interest:

Bank/Branch	Type of Account	Account Number	Amount
Bank One	Checking	1188-3734	\$250.00
_____	_____	_____	_____
_____	_____	_____	_____

List all cash under your control and stocks, shares and/or bonds in your or your spouse's name or in which you or your spouse have an interest. None

Attorney fees paid to date: \$ 1500.00 Court costs paid to date: \$ _____

List all debts not included in monthly payments schedule on page 1:

Creditor	Balance	Payment	Creditor	Balance	Payment
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

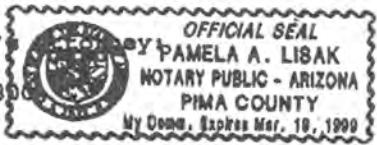
James A. Moran
Petitioner/Respondent

STATE OF ARIZONA)
County of Pima) ss:

SUBSCRIBED AND SWORN/AFFIRMED TO, before me this 13th day of August, 1996.

My commission expires: 3-19-99 Pamela A. Lisak
Notary Public

Name and address of Affiant's
Jean Moskow, Esq.
110 S. Church Ave., Suite 930
Tucson, Arizona 85701



Computer No. 64512

M-0

Q 112333

Continued from Page 1:

Other Monthly Payments
Creditor

Balance

Payment

American Express
Personal Loan

\$5236.12
2000.00

\$106.00
60.00

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ARIZONA SUPERIOR COURT, PIMA COUNTY

TAMMY LYNN FLORES, <p align="center">Petitioner,</p> ROBERT STEWART FLORES, <p align="center">Respondent.</p>	<p align="center">No. 112333</p> AFFIDAVIT RE: MINOR CHILDREN (A.R.S. 8-409)	<p align="center">FILED</p> <p align="center">96 96 AUG 15 PM 4: 23</p> JAMES M. CORBETT CLERK SUPERIOR COURT DEPUTY <i>Keith Urisak</i>
--	--	---

STATE OF ARIZONA)
) ss. Assigned To Judge
 County of Pima) Pro Tempore Quigley

1. Minor children subject to this proceeding are:

CHILD'S NAME: CASEY ALEXANDER FLORES BIRTHDATE: 2-25-87 BIRTHPLACE: Ft. Huachuca, AZ

DATES OF RESIDENCE [LAST 5 EARS]	ADDRESS OF CHILD DURING EACH RESIDENCE PERIOD	NAME AND PRESENT ADDRESS OF PERSON(S) HAVING PHYSICAL CUSTODY OF EACH CHILD DURING EACH PERIOD	RELATIONSHIP TO CHILD
1/96 to present	62805 S. Campbell #44104, Tucson, AZ	Robert & Tammy Flores	Parents
8/94 to 7/95	1617 S. Jackson, S.A., Texas	Robert & Tammy Flores	"
7/93 to 7/94	1701 Sunset #35, S.A., Texas	Robert & Tammy Flores	"
7/92 to 7/93	3300 Voight #31, S.A., Texas	Robert & Tammy Flores	"

CHILD'S NAME: Dakota Ryan Flores BIRTHDATE: 6-12-92 BIRTHPLACE: San Antonio, Texas

DATES OF RESIDENCE [LAST 5 EARS]	ADDRESS OF CHILD DURING EACH RESIDENCE PERIOD	NAME AND PRESENT ADDRESS OF PERSON(S) HAVING PHYSICAL CUSTODY OF EACH CHILD DURING EACH PERIOD	RELATIONSHIP TO CHILD
to present	SAME AS ABOVE		
to			
to			

CHILD'S NAME: _____ BIRTHDATE: _____ BIRTHPLACE: _____

DATES OF RESIDENCE [LAST 5 EARS]	ADDRESS OF CHILD DURING EACH RESIDENCE PERIOD	NAME AND PRESENT ADDRESS OF PERSON(S) HAVING PHYSICAL CUSTODY OF EACH CHILD DURING EACH PERIOD	RELATIONSHIP TO CHILD
to present			
to			
to			

Revised: 12/93

M-A

③

D112333

2. The nature of this action is: [] Dissolution [X] Legal Separation
[] Annulment [] Child Custody Modification.

3. The wife [] is [X] is not presently pregnant.

4. There [X] are [] are not minor children of either or both of the parties in this case who are in the custody of either or both of the parties.

5. I [] have [X] have not participated as a party, witness, or in any other capacity in any other litigation concerning custody of a child mentioned above, in this or any other state. (If affirmative, state name of each child, manner of participate, court, state and county (or district), case number, date of order of judgment, if any).

6. I [] do [X] do not have any information of any custody proceeding concerning a child mentioned above pending in a court of this or any other state. (If affirmative, state name of each child, nature of proceeding, court, state and county (or district), case number, status of proceeding).

7. I [] do [X] do not know of any person not a party to this proceeding who has physical custody or claims to have custody or visitation rights with respect to any child mentioned above. (If affirmative, state name and address of person, whether physical custody, claiming custody rights, or claiming visitation rights, name of child involved).

8. Wife's mailing address is: c/o Butler & Stein, P.C., 110 S. Church #9300, Tucson 85701

9. Husband's mailing address is: 6280 S. Campbell #44104, Tucson, Arizona 85706

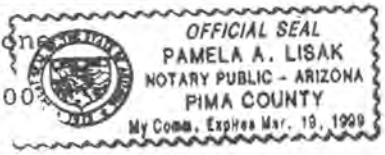
Sammy Jones
[X] Petitioner [] Respondent

STATE OF ARIZONA)
) ss.
Count of Pima)

SUBSCRIBED AND SWORN TO before me this 13th day of August, 1996.

My commission expires: 3-19-99 Pamela A. Lisak
Notary Public

Attorney's name, address, phone
Jean Moskow, Esq.
110 S. Church Ave., Suite 9300
Tucson, Arizona 85701
(602) 628-1618
Computer No. 64512



M-A

IMPORTANT - YOU SHOULD READ THIS COURT ORDER IMMEDIATELY

ARIZONA SUPERIOR COURT, PIMA COUNTY

Petitioner
TAMMY LYNN FLORES,

Respondent
ROBERT STEWART FLORES.

NO. D- **D 112333**
PRELIMINARY INJUNCTION
AGAINST BOTH
PETITIONER AND RESPONDENT
Assigned to Judge
Pro Tempore Quigley

FILED

86 AUG 15 PM 4:22

JAMES N. CORBETT
CLERK OF SUPERIOR COURT

WARNING. THIS IS AN OFFICIAL COURT ORDER. IF YOU DISOBEY THIS ORDER THE COURT MAY FIND YOU IN CONTEMPT OF COURT. YOU MAY ALSO BE ARRESTED AND PROSECUTED FOR THE CRIME OF INTERFERING WITH JUDICIAL PROCEEDINGS AND ANY OTHER CRIME YOU MAY HAVE COMMITTED IN DISOBEYING THIS ORDER.

YOU OR YOUR SPOUSE MAY FILE A CERTIFIED COPY OF THIS ORDER WITH THE PIMA COUNTY SHERIFF. A CERTIFIED COPY MAY BE OBTAINED FROM THE CLERK OF THE COURT THAT ISSUED THIS ORDER. IF YOU ARE THE PERSON THAT BROUGHT THIS ACTION, YOU MUST ALSO FILE EVIDENCE WITH THE SHERIFF THAT THIS ORDER WAS SERVED ON YOUR SPOUSE.

THIS COURT ORDER IS EFFECTIVE UNTIL A FINAL DECREE OF DISSOLUTION OR LEGAL SEPARATION IS FILED OR THE ACTION IS DISMISSED.

IT IS ORDERED that during the pendency of this action YOU, PETITIONER AND RESPONDENT NAMED ABOVE, as parties to this action, are enjoined from and shall not:

(a) Transfer, encumber, conceal, sell or otherwise dispose of any of the joint, common or community property of the parties, except in the usual course of business or for necessities of life, without the written consent of both parties or permission of the court; and, the use of joint property of the parties is permissible for "court fees and reasonable attorney fees associated with an action filed under this article".

(b) Molest, harass, disturb the peace of, or commit an assault or battery on the person of your spouse (petitioner or respondent) or any natural or adopted child of the parties; and

(c) Remove from the State of Arizona any natural or adopted child of the parties presently residing in the State of Arizona without prior written consent of both parties or permission of the court.

IT IS FURTHER ORDERED that this injunction is effective against both parties to this action. If you are the petitioner, the injunction is effective upon filing the petition for dissolution or legal separation. If you are the respondent, this injunction is effective upon being served with, or accepting service of, a copy of this injunction upon you.

IT IS FURTHER ORDERED that this injunction has the same force and effect an order of the Superior Court signed by a judge and is enforceable by all remedies made available by law, including contempt of court.

Issued by my hand and seal of this court this _____ day of _____, 19____
Jean Moskow, Esq.
BUTLER & STEIN, P.C.
110 S. Church, Ste. 9300
Tucson, AZ 85701
(602) 628-1618 Computer No.:64512

AUG 15 1996
JAMES N. CORBETT
Clerk of the Court
By: *[Signature]*
Deputy Clerk *Keith Ulisaber*

M-A

2

Keith Ulisaber

1 Jean Moskow, Esq.
2 BUTLER & STEIN, P.C.
3 110 South Church Ave.
4 Suite 9300
5 Tucson, Arizona 85701
6 (602) 628-1618
7 Pima County Computer No. 64512
8 Attorney for Petitioner

FILED
96 86 AUG 15 PM 4:21
JAMES N. CORBETT
CLERK SUPERIOR COURT
BY *[Signature]*
DEPUTY

9 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA *Ruth Ulisak*
10 IN AND FOR THE COUNTY OF PIMA

11 In re the Marriage of:)
12 TAMMY LYNN FLORES,) NO. D- D 112333
13 Petitioner,) PETITION FOR LEGAL SEPARATION
14 vs.) (with children)
15 ROBERT STEWART FLORES,) (Unassigned)
16 Respondent.)

Assigned To Judge
Pro Tempore Quigley

17 Petitioner, TAMMY LYNN FLORES, ("Petitioner"), by and
18 through her attorney undersigned, as and for her Petition for
19 Legal Separation hereby alleges as follows:

20 I

21 That petitioner is the wife of the respondent, ROBERT
22 STEWART FLORES, ("Respondent"); that the true name of
23 petitioner is TAMMY LYNN FLORES; that petitioner is 32 years of
24 age, having been born on the 4th day of February 1964, that her
25 social security number is [REDACTED] that petitioner resides
26 at 6280 South Campbell #44104, Pima County, Arizona 85706; that
27 petitioner is currently on disability and unemployed; that she

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

FILED: STATEMENT
RE MINOR CHILDREN

135446

141

[Handwritten initials]

CIVIL

M-A

①

1 has been a resident of and domiciled in Pima County, Arizona
2 for more than ninety (90) days prior to the filing of this
3 petition; and that she is currently not pregnant.

4 II

5 That respondent is the husband of the petitioner; that the
6 true name of respondent is ROBERT STEWART FLORES; that
7 respondent is 35 years of age, having been born on the 24th day
8 of February, 1961; that respondent resides at 6280 South
9 Campbell #44104, Tucson, Pima County, Arizona 85706; that
10 respondent is currently employed by St. Joseph's Hospital,
11 Tucson, Arizona; and that respondent has been a resident of and
12 domiciled in Pima County, Arizona for more than ninety days
13 prior to the filing of this petition.

14 III

15 That the parties were married in Sierra Vista, Arizona, on
16 or about May 19, 1986.

17 IV

18 That petitioner desires to live separate and apart from
19 respondent, and no conciliation proceedings have been filed by
20 either party.

21 V

22 That there are two minor children of the marriage; namely,
23 CASEY ALEXANDER FLORES ("Casey"), whose date of birth is
24 February 25, 1987, and DAKOTA RYAN FLORES, whose date of birth
25 is June 12, 1992.

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VI

That petitioner is a fit and proper person to be granted sole legal custody of the parties' minor children, subject to visitation for respondent, and it is in the best interests of the minor children that such a custody arrangement be ordered, *pendente lite*.

VII

That respondent should be ordered to pay child support to petitioner, through the Clerk of Pima County Superior Court, in an amount determined pursuant to the Arizona Child Support Guidelines.

VIII

That petitioner is entitled to and in need of spousal maintenance.

IX

That the parties have acquired certain joint, common, and community property, both real and personal, during their marriage, which property should be equitably divided.

X

That the parties have acquired certain joint, common, and community financial obligations during their marriage, which obligations should be equitably allocated.

XI

That it is the best interest of the minor children that *pendente lite* orders be issued with regard to child custody and support.

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

XII

1
2 That petitioner is entitled to and in need of spousal
3 maintenance, *pendente lite*.

4 WHEREFORE, petitioner prays that this Court:

5 1. Grant the parties a legal separation one from the
6 other;

7 2. Award petitioner sole legal custody of the parties'
8 minor children, subject to reasonable visitation rights for
9 respondent;

10 3. Order respondent to pay child support to petitioner
11 in an amount determined by the Arizona Child Support
12 Guidelines;

13 4. Order respondent to pay to petitioner a reasonable
14 sum as and for spousal maintenance;

15 5. Award and reaffirm any and all of petitioner's
16 separate property to petitioner, as her sole and separate
17 property, free and clear of any and all claims of the
18 respondent;

19 6. Award and reaffirm any and all of respondent's
20 separate property to respondent, as his sole and separate
21 property, free and clear of any and all claims of the
22 petitioner;

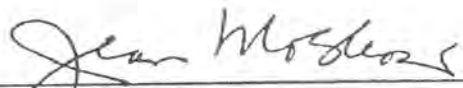
23 7. Order that the joint, common and community property
24 of the parties, both real and personal, be equitably divided;

25 8. Order that the joint, common and community debts and
26 obligations of the parties be equitably allocated;

- 1 9. Issue an order requiring respondent to appear and
2 show cause, if any he has, why the Court should not:
3 a. Award petitioner sole custody of the parties'
4 minor children, *pendente lite*, subject to reasonable visitation
5 for respondent;
6 b. Order respondent to pay petitioner through the
7 Clerk of the Court a sum of money as and for temporary child
8 support, *pendente lite*;
9 c. Order respondent to pay to petitioner, *pendente*
10 *lite*, a reasonable sum as and for spousal maintenance;
11 d. Order respondent to pay to petitioner and/or her
12 attorney a reasonable amount toward the attorney's fees and
13 costs to be incurred in bringing this action; and
14 e. Order any other and further relief deemed just
15 and proper under the circumstances.
16 7. Grant such other and further relief as this court
17 deems just and proper under the circumstances.

18 RESPECTFULLY SUBMITTED this 15 day of August 1996.

19 BUTLER & STEIN, P.C.
20

21 
22 _____
23 Jean Moskow
24 Attorney for Petitioner
25
26
27
28

D112333

VERIFICATION

1
2 STATE OF ARIZONA)
3 County of Pima) ss:

4 TAMMY LYNN FLORES, being first duly sworn upon her oath
5 deposes and says:

6 1. That she is the Petitioner in the above entitled
7 action;

8 2. That as such, she is familiar with the facts in this
9 action;

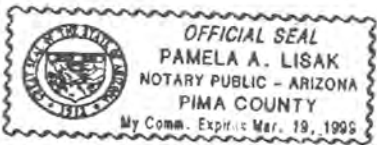
10 3. That she has read the foregoing pleading and knows the
11 contents thereof;

12 4. That the contents of the pleading are true to the best
13 of her knowledge, except as to those items stated on information
14 and belief, and as to those she believes them to be true.

15
16 *Tammy Lynn Flores*
17 TAMMY LYNN FLORES

18 SUBSCRIBED AND SWORN to before me this 13 day of
19 August, 1996, by TAMMY LYNN FLORES.

20 (SEAL)



21 *Pamela A Lisak*
22 NOTARY PUBLIC

23 My Commission Expires: 3-19-99

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M-A

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

BUTLER & STEIN, P.C.
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TUCSON, ARIZONA 85701
(520) 628-1818

AS

1 Jean Moskow, Esq.
2 BUTLER & STEIN, P.C.
3 110 South Church Ave.
4 Suite 9300
5 Tucson, Arizona 85701
6 (602) 628-1618
7 Pima County Computer No. 64512
8 Attorney for Petitioner

FILED
JAMES M. CORBETT
CLERK SUPERIOR COURT

96 AUG 16 PM 4:50

BY: J. HOOKE, DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

9 In re the Marriage of:)
10 TAMMY LYNN FLORES,)
11 Petitioner,)
12 vs.)
13 ROBERT STEWART FLORES,)
14 Respondent.)

2 112333

NO. D- 112333

ORDER TO SHOW CAUSE

CONFIRMATION DUE
PURSUANT TO LOCAL RULE 8.3(E)
(With children)

Assigned To Judge
Pro Tempore Quigley

Upon good cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that

Respondent, ROBERT STEWART FLORES, shall appear before this
Court at 110 West Congress, Tucson, Pima County, Arizona on _____
_____, the 30th day of September, 1996 at the hour of _____
10:00 a.m., then and there to show cause, if any he has, why
the Court should not grant the following relief:

1. Award Petitioner sole custody of the parties' minor children, *pendente lite*, subject to liberal visitation for Respondent;
2. Order Respondent to pay to Petitioner through the Clerk of the Court a sum of money as and for child support,

(R)

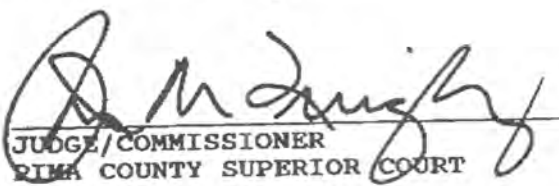
D112333

1 pendente lite;

2 3. Order Respondent to pay to Petitioner a sum of money
3 as and for spousal maintenance, pendente lite;

4 4. Order such other and further relief as this court
5 deems just and proper under the circumstances.

6 DONE IN OPEN COURT this 15th day of August, 1996.

7
8
9 
10 JUDGE/COMMISSIONER
11 PIMA COUNTY SUPERIOR COURT

12 JOHN M. QUIGLEY

13 BUTLER & STEIN, P.C.
14 ATTORNEYS AT LAW
15 110 SOUTH CHURCH AVENUE
16 SUITE 8300
17 TUCSON, ARIZONA 85701
18 (520) 628-1618

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BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

A

1 Jean Moskow, Esq.
2 BUTLER & STEIN, P.C.
3 110 South Church Ave.
4 Suite 9300
5 Tucson, Arizona 85701
6 (602) 628-1618
7 Pima County Computer No. 64512

8 Attorney for Petitioner

FILED

96 AUG 21 PM 6:40

JAMES N. CORBETT
CLERK OF SUPERIOR COURT

BY *[Signature]*
DEPUTY

9 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

10 IN AND FOR THE COUNTY OF PIMA

11 In re the Marriage of:)
12 TAMMY LYNN FLORES,)
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NO. D-112333

REQUEST FOR
CHANGE OF JUDGE

(Assigned to
Judge Quigley)

Pursuant to Rule 42(f), Ariz.R.Civ.P., notice is hereby given that the above named petitioner does hereby exercise her right to a change of judge in the above-captioned action and petitioner requests that the action be transferred from the Honorable John Quigley and assigned to another judge designated in accordance with said rule. Undersigned counsel avows that no previous requests have been made in this case for change of judge.

DATED this 21 day of Aug, 1996.

BUTLER & STEIN, P.C.

Jean Moskow
Jean Moskow
Attorney for Petitioner

1-K

D112333

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COPY of the foregoing
mailed this 21 day
of August, 1996 to:

Lynn Elaine Saul, Esq.
100 N. Stone Avenue #602
Tucson, Arizona 85701
Attorney for Respondent

Copy of the foregoing
hand-delivered this 21 day
of August, 1996, to:

The Honorable John M. Quigley
Pima County Superior Court
110 W. Congress Street
Tucson, Arizona 85701

The Honorable Gordon T. Alley
Pima County Superior Court
110 W. Congress Street
Tucson, Arizona 85701

Domestic Court Administrator

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

M-K

ARIZONA SUPERIOR COURT, PIMA COUNTY

In re the Marriage of: TAMMY LYNN FLORES, Petitioner, and ROBERT STEWART FLORES, Respondent,	No. D-112333 ✓ ACCEPTANCE OF SERVICE OF PROCESS PRAYER FOR RESTORATION OF FORMER NAME	FILED JAMES N. CORBETT CLERK SUPERIOR COURT 96 AUG 26 PM 5:30 BY: E. BRADFORD. DEPUTY
---	--	--

NOTE: PETITION MUST BE FILED AND PRELIMINARY INJUNCTION ISSUED BEFORE THIS IS SIGNED.

RESPONDENT, pursuant to Rule 5(e), Arizona Rules of Civil Procedure:

1. Hereby accepts service of Petition, Preliminary Injunction and Affidavit Regarding Minor Children; Right to Convert Medical Insurance, Request for Order to Show Cause, Order to Show Cause, Spouse's Financial Affidavit, Blank Spouse's Affidavit, and Rule 8.
2. Hereby waives issuance and service of Summons;
3. Hereby acknowledges that failure to appear and defend in the above entitled action in this court, within TWENTY (20) days, exclusive of the date signed, if signed within the State of Arizona, or within THIRTY (30) days, exclusive of the date signed, if signed without the State of Arizona, may result in judgment by default being rendered against respondent for the relief demanded in the petition;
4. If in the military, respondent further waives rights under the Soldiers' and Sailors' Civil Relief Act of 1940, as amended.
5. Optional: Respondent prays that the court include in the Decree, restoration of Respondent's former name, to-wit _____, and waives all further notices and presence in court, and consents to hearing and determination of this dissolution action by a Court Commissioner of the above court.



 Respondent's Signature

SUBSCRIBED AND SWORN TO before me on August 26, 1996
 My commission expires: 10/12/97

 Notary Public

RESPONSE FEE REQUIRED ONLY IF RESTORATION OF FORMER NAME REQUESTED.

Attorney's Name, Address, Phone:

Jean Moskow, Esq.
 BUTLER & STEIN, P.C.
 110 South Church, Suite 9300
 Tucson, Arizona 85701
 (602) 628-1618
 PCC: 64512


PCBA DR-03
 Revised: 12/93

811-11

FILED

96 AUG 28 PM 5:56

JAMES N. CORBETT
CLERK OF SUPERIOR COURT

BY 

1 Law Office of
2 LYNN ELAINE SAUL
3 100 N. Stone Avenue, Suite 602
4 Tucson AZ 85701
5 (520) 882-6226
6 Fax (520) 882-7678
7 State Bar # 3343
8 Pima County Comp. # 40144
9 Attorney for Respondent

10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
11 IN AND FOR THE COUNTY OF PIMA

12 In re the Marriage of
13 TAMMY LYNN FLORES,
14 Petitioner,
15 and
16 ROBERT STEWART FLORES,
17 Respondent.

18)
19) No. D-112333
20)
21) RESPONSE
22)
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28 Respondent, ROBERT STEWART FLORES, by his attorney, LYNN ELAINE SAUL, hereby responds to the Petition for Dissolution of Marriage filed in this matter as follows:

- 29 I. Admitted.
- 30 II. Admitted.
- 31 III. Admitted.
- 32 IV. Admitted, but Respondent affirmatively alleges that he objects to a Legal Separation being entered in this matter and requests that this action be treated as an action for Dissolution of Marriage.
- 33 V. Admitted.
- 34 VI. Denied. Respondent affirmatively alleges that Petitioner has certain emotional disabilities which make it inappropriate and

REC# 08-24-98 137797
 DOC# 20112333
 RESP DISSOLUTION \$106.50
 CHECK \$106.50

169

M-0

CIVIL ENTRY Teresa Mayou

1 not in the best interest of the children for her to have sole
2 custody of the minor children. Respondent further
3 affirmatively alleges that the best interest of the children
4 would be served either by Respondent having sole legal custody
5 of the children, or by an agreement for joint legal and
6 physical custody of the children, *pendente lite* and
7 permanently.

8 VII. Respondent admits that child support should be paid in
9 accordance with the Arizona Child Support Guidelines, based on
10 the ultimate custody arrangements reached by the parties.

11 VIII. Denied.

12 IX. Respondent denies that there is any real property owned as
13 joint, common or community property by the parties; otherwise,
14 Paragraph IX is admitted.

15 X. Admitted.

16 XI. Admitted.

17 XII. Denied.

18 WHEREFORE, Respondent requests this Court:

19 I. To decree a dissolution of the marriage of the parties.

20 II. To deny the relief requested by Petitioner for *pendente lite*
21 custody and support orders.

22 III. To grant Respondent sole custody of the minor children of the
23 parties, subject to reasonable visitation by Petitioner,
24 *pendente lite* and permanently, or, in the alternative, to
25 approve a joint custody agreement if the parties are able to
26 reach such an agreement.

27 IV. To order reasonable child support in accordance with the
28 Arizona Child Support Guidelines.

M-0

1 v. To equitably divide the joint, common and community property
2 and obligations of the parties.

3 VI. For such other relief as may be just and reasonable.

4 DATED this 28 day of August, 1996.

6 Lynn Elaine Saul
7 LYNN ELAINE SAUL
8 Attorney for Respondent

9 STATE OF ARIZONA)
10)
11 COUNTY OF PIMA)

12 The foregoing Response to Petition for Dissolution of Marriage
13 is true and correct.

14 Robert A. Flores
15 ROBERT STEWART FLORES

16 SUBSCRIBED AND SWORN TO before me this 28 day of
17 August, 1996.

18 Lynn Elaine Saul
19 Notary Public

20 My commission expires: 10/10/97

21 Copy mailed this 28 day of
22 August, 1996 to:

23 Jean Moskow
110 S. Church #9300
Tucson AZ 85701

24 Attorney for Petitioner

M-0

Office of
CLERK OF SUPERIOR COURT, PIMA COUNTY
TUCSON, ARIZONA

CIV No 137797

DATE: 8-28-96

Received from: Saul

Amount Received: 106 ⁵⁰ Case No. D 112333

Caption: Tony Flores v Robert Flores

Cash Check Money Order Credit Card

New Civil <input type="checkbox"/>	Appearance Fee <input type="checkbox"/>	Passport <input type="checkbox"/>
New Dissolution <input type="checkbox"/>	Appeal Fee <input type="checkbox"/>	Marriage License <input type="checkbox"/>
New Annulment <input type="checkbox"/>	Cash Bond <input type="checkbox"/>	Notary <input type="checkbox"/>
New SF <input type="checkbox"/>	Writ/subpoena <input type="checkbox"/>	Process Server <input type="checkbox"/>
New Domestic <input type="checkbox"/>	Jury Fees <input type="checkbox"/>	Photocopies <input type="checkbox"/>
New T Case <input type="checkbox"/>	Post Judgment <input type="checkbox"/>	Search Fee <input type="checkbox"/>
Change Venue <input type="checkbox"/>	Transmittal <input type="checkbox"/>	Misc. <u>Gusma</u>

James N. Corbett

By: Miley Johnson
Deputy Clerk

M-O

51

FILED
JAMES N. CORBETT
CLERK SUPERIOR COURT

96 AUG 28 PM 3:40

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE: HON. RICHARD NICHOLS BY: H. MULHOLLAND, DEPUTY CLERK CASE NO. D-112333

COURT REPORTER: None DATE: August 28, 1996

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES Petitioner and
Jean Moskow Petitioner's Attorney

ROBERT STEWART FLORES Respondent
Lynn Elaine Saul Respondent's Attorney

NOTICE

IN CHAMBERS:

This matter having been reassigned to this Division; **IT IS HEREBY ORDERED** resetting the Order to Show Cause to *October 1, 1996 at 9:00 a.m. for 1 hour.* NOTE: Confirmation due pursuant to Local Rule 8.3(E).

cc: Hon. Richard Nichols
Domestic Calendaring
Jean Moskow, Esq.
Lynn Elaine Saul, Esq.
Hon. John M. Quigley

AUG 29 1996

Raquel Fleischman
Judicial Administrative Assistant

MA-2

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
JAMES H. BERDET
CLERK OF SUPERIOR COURT
IN AND FOR THE COUNTY OF PIMA

FILED
96 AUG 28 AM 10:54
NOTICE RE: REASSIGNMENT

PETITIONER: FLORES, TAMMY LYNN
RESPONDENT: FLORES, ROBERT STEWART

BY: E. BRADFORD,
DEPUTY

CASE: D-112333
DATE: 8/27/1996

Pursuant to Rule 5.3, Local Rules of Practice, AND

A NOTICE OF CHANGE OF JUDGE HAVING BEEN FILED
BY JEAN MOSKOW, ESQ.

This case is reassigned to JUDGE RICHARD D. NICHOLS, DIVISION 14,
for all further proceedings herein.

CC: HON. RICHARD D. NICHOLS
HON. JOHN M. QUIGLEY
JEAN K MOSKOW
LYNN ELAINE SAUL
CALENDAR SERVICES

BY: JULIANNE GREENOUGH
DEPUTY COURT ADMINISTRATOR

117-18

Court Admin.
cc

1 Jean Moskow, Esq.
2 BUTLER & STEIN, P.C.
3 110 South Church Ave.
4 Suite 9300
5 Tucson, Arizona 85701
6 (602) 628-1618
7 Pima County Computer No. 64512
8 Attorney for Petitioner

9 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
10 IN AND FOR THE COUNTY OF PIMA

11 In re the Marriage of:

12 TAMMY LYNN FLORES,
13 Petitioner,
14 vs.
15 ROBERT STEWART FLORES,
16 Respondent.

NO. D-112333
REQUEST FOR
CHANGE OF JUDGE

(Assigned to
Judge Quigley)

17 Pursuant to Rule 42(f), Ariz.R.Civ.P., notice is hereby
18 given that the above named petitioner does hereby exercise her
19 right to a change of judge in the above-captioned action and
20 petitioner requests that the action be transferred from the
21 Honorable John Quigley and assigned to another judge
22 designated in accordance with said rule. Undersigned counsel
23 avows that no previous requests have been made in this case
24 for change of judge.

25 DATED this 21 day of Aug, 1996.

BUTLER & STEIN, P.C.

26 Jean Moskow
27 Jean Moskow
28 Attorney for Petitioner

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520)628-1618

Handwritten initials and date: *OS*
AM
8/27/96

50-10

D 112333

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COPY of the foregoing
mailed this 21 day
of August, 1996 to:

Lynn Elaine Saul, Esq.
100 N. Stone Avenue #602
Tucson, Arizona 85701
Attorney for Respondent

Copy of the foregoing
hand-delivered this 21 day
of August, 1996, to:

The Honorable John M. Quigley
Pima County Superior Court
110 W. Congress Street
Tucson, Arizona 85701

The Honorable Gordon T. Alley
Pima County Superior Court
110 W. Congress Street
Tucson, Arizona 85701

Domestic Court Administrator

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520)628-1618

MA-K

FILED

96 AUG 28 PM 6:47

JAMES N. CORBETT
CLERK OF SUPERIOR COURT

BY *Paul J. Galbreath*
CLERK

1 Law Office of
2 LYNN ELAINE SAUL
3 100 N. Stone Avenue, Suite 602
4 Tucson AZ 85701
5 (520) 882-6226
6 Fax (520) 882-7478
7 State Bar # 3343
8 Pima County Camp. # 40164

9 Attorney for Respondent

10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

11 IN AND FOR THE COUNTY OF PIMA

12 In re the Marriage of)

13 TAMMY LYNN FLORES)

No. D-112333

14 Petitioner,)

REQUEST FOR MEDIATION

15 and)

(Unassigned)

16 ROBERT STEWART FLORES)

17 Respondent.)

18 Respondent Robert Stewart Flores, by his attorney, LYNN ELAINE
19 SAUL, requests that this matter be referred to mediation as the
20 parties have a dispute regarding custody and/or visitation.

21 The names and addresses of the parties are as follows:

22 Robert Stewart Flores
23 6280 S. Campbell #44104
24 Tucson AZ 85706

Tammy Lynn Flores
& Jean Moskow, Esq.
BUTLER & STEIN, P.C.
110 S. Church Suite 9300
Tucson AZ 85701

25 Dated this 28 day of August, 1996.

Lynn Elaine Saul

LYNN ELAINE SAUL
Attorney for Respondent

M-K

0112333

1 Copy mailed this 28 day
2 of August, 1996 to:
3 Jean Moskow, Esq.
4 BUTLER & STEIN, P.C.
5 110 S. Church Suite 9300
6 Tucson AZ 85701
7 Attorney for Petitioner
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PAID-10

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520)628-1618

1 Jean Moskow, Esq.
BUTLER & STEIN, P.C.
2 110 South Church Ave.
Suite 9300
3 Tucson, Arizona 85701
(602) 628-1618
4 Pima County Computer No. 64512
5 Attorney for Petitioner

96 FILED
96 SEP 25 PM 4:55
JAMES W. CURTIS
CLERK OF THE COURT
BY *JA*
DEPUTY

6
7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF PIMA**

9 In re the Marriage of:)
10 TAMMY LYNN FLORES,)
11 Petitioner,)
12 vs.)
13 ROBERT STEWART FLORES,)
14 Respondent.)

NO. D-112333
CONFIRMATION OF
ORDER TO SHOW CAUSE
HEARING

15 PLEASE TAKE NOTICE that the Order to Show Cause hearing
16 scheduled for Tuesday, October 1, 1996 at the hour of 9:00
17 a.m., will take place as scheduled.

18 RESPECTFULLY SUBMITTED this 25th day of September, 1996.

19 BUTLER & STEIN, P.C.

20
21 *J Moskow*
22 Jean Moskow
Attorney for Petitioner

23 Copy of the foregoing
24 mailed this 25th day of
September, 1996, to:

25 Lynn Elaine Saul, Esq.
100 N. Stone Avenue #602
26 Tucson, Arizona 85701
27 Attorney for Respondent

28 Court Administrator

M-K

ARIZONA SUPERIOR COURT, PIMA COUNTY FILED

In re the Marriage of: TAMMY LYNN FLORES, and ROBERT STEWART FLORES, Respondent.	NO. D 112333 SPOUSE'S FINANCIAL AFFIDAVIT <input type="checkbox"/> As of date of order sought to be modified <input checked="" type="checkbox"/> Current	JAMES N. CORBETT CLERK SUPERIOR COURT 96 SEP 27 96 SEP 27 PM 2:53 BY: E BRADFORD, DEPUTY Assigned to Judge Pro Tempore Quigley
--	--	--

NAME: Robert Stewart Flores BIRTHDATE: 2-24-61
 ADDRESS: 6280 South Campbell, #44104 SSN: [REDACTED]
Tucson, Arizona 85706

NECESSARY MONTHLY EXPENSES
 For yourself & minor child(ren) residing with you.

Housing (rent/mtg):	<u>470.00</u>
Repair/Upkeep:	
Utilities:	
Electricity	<u>100.00</u>
Gas	
Water	
Phone	<u>65.00</u>
Garbage	
Food & Household Supplies:	<u>200.00</u>
Work/School Lunch:	<u>50.00</u>
Medical, dental, drugs, supplies:	<u>10.00</u>
Insurance not deducted from pay:	
Clothing:	<u>100.00</u>
Laundry/Dry Cleaning:	
Child Care/Sitter:	
Support paid for spouse and/or minor children of prior marriage:	
Car Repair/Maint.	<u>113.70</u>
Car Insurance	<u>29.00</u>
Gas/Oil	<u>90.00</u>
License	<u>25.00</u>
Bus/Taxi Fares	
Other: <u>MISC</u>	<u>50.00</u>
<u>VOICEMAIL/PAGER</u>	<u>15.94</u>
<u>Cell - 1yr contract</u>	<u>39.00</u>

OTHER MONTHLY PAYMENTS

Creditor	Balance	Payment
Chase Mastercards	<u>500.00</u>	<u>\$ 20.00</u>
Sears	<u>50.00</u>	<u>\$ 10.00</u>
MSAP Student Loans	<u>3,039.43</u>	<u>\$ 50.00</u>
M&T-Comm	<u>906.04</u>	<u>\$ 20.00</u>
* Total from page # 3		<u>50.00</u>
TOTAL MONTHLY PAYMENTS.....		<u>\$ 150.00</u>
TOTAL MONTHLY EXPENSES/PAYMENTS..		<u>\$ 1517.64</u>
GROSS PAYCHECK (YTD AVERAGE)....		<u>\$ 800.00</u>
[check one]		
weekly x 4.3	<input checked="" type="checkbox"/> twice mo. x 2	
monthly	<input type="checkbox"/> every 2 wks x 2.16	
GROSS MONTHLY INCOME.....		<u>\$ 1600.00</u>
GROSS PAYCHECK (current).....		<u>\$ 800.00</u>
Less:		
Federal Taxes	<u>\$ 58.-</u>	
State Taxes	<u>16.51</u>	
FICA	<u>51.00</u>	
Credit Union	<u>0.-</u>	
Insurance	<u>29.-59</u>	
Union Dues	<u>.-</u>	
Savings, etc.	<u>.-</u>	
Other: <u>FRA H</u>	<u>10.00</u>	
<u>Medicare</u>	<u>12.00</u>	
Total deductions.....		<u>\$ 176.00</u>
Net Paycheck.....		<u>\$ 624.00</u>
OTHER MONTHLY INCOME		
Pension/Retirement		\$ _____
Social Security/SSI		_____
Dividends/Interest		_____
GA/APDC		_____
Rec'd. for minor child(ren) not of this marriage under your care		_____
Other:		_____
TOTAL OTHER INCOME.....		<u>\$ 0</u>

TOTAL MONTHLY EXPENSES..... \$ 1367.64

Computer No.

Present Occupation: Licensed Practical Nurse Starting Date: 2/21/96

Name, address, phone of present employer: St. Josephs Hospital, 350 N. Wilmat RD
(915) 721-3905 Tucson, AZ

Prior Occupation: Licensed Practical Nurse Starting Date: 08/26/95
Monthly pay: _____ Ending Date: 02/20/96

Name, address, phone number of prior employer: Flower Square Health Care Center
2502 N. Dodge, Tucson AZ

If not employed, why? _____

Do you expect to work? _____ If so, when? _____ Anticipated Occupation: _____

Name(s) and age(s) of minor child(ren) residing with you: _____

Are you or your spouse pregnant? Dyes If yes, estimated deliver date: _____

Physical defect or organic disease suffered by you or your minor children: None

List all bank accounts, including checking, savings, credit union, certificates of deposit, in your name, in name of both spouses, or in which you have an interest:

Bank/Branch	Type of Account	Account Number	Amount
<u>Saguaro Credit Union</u>	<u>Checking/Savings</u>	<u>52012</u>	<u>100⁰⁰/50⁰⁰</u>
<u>1st Community Federal Credit Union</u>	<u>Savings</u>	<u>96765003</u>	<u>50⁰⁰</u>
<u>3505 Wildwood Dr. San Angelo TX 76904</u>			

List all cash under your control and stocks, shares and/or bonds in your or your spouse's name or in which you or your spouse have an interest. _____

Attorney fees paid to date: \$ 666.50 Court costs paid to date: \$ _____

List all debts not included in monthly payments schedule on page 1:

Creditor	Balance	Payment	Creditor	Balance	Payment
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

R. Flou
Petitioner/Respondent

STATE OF ARIZONA)
County of Pima) ss:

SUBSCRIBED AND SWORN/AFFIRMED TO, before me this 25 day of September, 1996.

My commission expires: 10/10/97

Lynn Elaine Saul
Notary Public

Name and address of Affiant's Attorney:

LAW OFFICE OF
LYNN ELAINE SAUL
100 N. STONE, SUITE 802
TUCSON, AZ 85701
(602) 882-6226

M-Q

0 112333

Continued from page 1:

Other Monthly payments Creditor	Balance	Payment
Personal Loan	\$650.00	50.00

M-Q

15

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE: HON. RICHARD NICHOLS

CASE NO. D-112333

COURT REPORTER: NONE

DATE: October 1, 1996

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES

Petitioner

Petitioner's Attorney

and

Respondent's Attorney

ROBERT STEWART FLORES

Respondent

MINUTE ENTRY

ORDER TO SHOW CAUSE - RE TEMPORARY ORDERS:

The matter having settled,

IT IS ORDERED the hearing set this date is vacated.

cc: Hon. Richard Nichols
Domestic Calendaring
Jean K. Moskow, Esq.
Lynn Elaine Saul, Esq.

OCT 1 REC'D

M-O

Pat Dini
Deputy Clerk

Pima County Computer Number: 64512

SUPERIOR COURT OF ARIZONA, COUNTY OF PIMA

FILED
96 OCT -7 PM 5:07

TAMMY LYNN FLORES,)
Petitioner,)
vs.)
ROBERT STEWART FLORES,)
Respondent.)

Case No. D-112333

**OBLIGEE/OBLIGOR
FACT SHEET**

JAMES N. COUGLIT
CLERK SUPERIOR COURT
BY: *William Curtis*
William Curtis

OBLIGOR

OBLIGEE

NAME ROBERT STEWART FLORES
SSN [REDACTED]
DATE OF BIRTH 02/24/61
ADDRESS 6280 South Campbell #44104
TUCSON, AZ 85706

NAME TAMMY LYNN FLORES
SSN [REDACTED]
DATE OF BIRTH 02/04/64
ADDRESS 380 W. Taylor #10
SIERRA VISTA, AZ 85635

EMPLOYER INFORMATION

AGENCY (If Applicable)

FIRM NAME St. Joseph's Hospital
ADDRESS 350 N. Wilmot Road
Tucson, Arizona

CHILDREN:

NAME	DATE OF BIRTH	SOCIAL SECURITY #
<u>Casey Alexander Flores</u>	<u>02/25/87</u>	_____
<u>Dakota Ryan Flores</u>	<u>06/12/92</u>	_____
_____	_____	_____

****IT IS THE RESPONSIBILITY OF THE OBLIGEE/OBLIGOR TO KEEP THE CHILD SUPPORT DIVISION NOTIFIED WHEN ANY CHANGES TO THE ABOVE OCCUR****

M-0

Person Filing: Jean Moskow, Esq.

Address: 110 S. Church, #9300, Tucson, AZ 85701

Phone: 628-1618

Representing: Petitioner

Pima County Computer Number: 64512

FILED

96 OCT -7 PM 5:06

JAMES N. CONLITT
CLERK OF SUPERIOR COURT
BY William Curtis
DEPUTY

SUPERIOR COURT OF ARIZONA, COUNTY OF PIMA

In re the Marriage of)

TAMMY LYNN FLORES)
Petitioner,)

vs.)

ROBERT STEWART FLORES)
Respondent.)

Case No. D-112333

ORDER OF ASSIGNMENT

- Without Notice
- After Hearing
- Automatic

R
O

TO: Current and future employers or other payors of:

Name: ROBERT STEWART FLORES

Social Security Number: [REDACTED]

You shall hold and send to:

Clerk of the Superior Court
Child Support Unit
110 West Congress
Tucson, Arizona 85701

the amount of \$ 420.00 per MONTH OR _____ % of _____
income or other monies in a check made payable to the Clerk of the
Superior Court plus an additional \$12 per year handling fee to be paid to the
Clerk of the Superior Court.

M-Q

(R)

D112333

THIS ORDER MODIFIES ANY PREVIOUSLY ORDERED ASSIGNMENT WITH THIS CASE NUMBER.

This Order of Assignment is binding Order on you, and continues until further Order of the court. [] 31 DAYS or [x] 14 days after service of this

If this is an Order "Without Hearing", you are ordered to deliver or mail by registered or certified mail a copy of: (1) the Request, (2) the Assignment Order, and 93) the Notice to the person ordered to pay child support or spousal maintenance within ten days of the date you were served.

You are further ordered that, as a result of this assignment, you are not to discharge or otherwise discipline the person named.

Dated: 10-7-96

[Signature]
Judicial Officer or Clerk of the Court

*If you receive a Notice of Subsequent Employer/Payor Subject to an Order of Assignment "Without Notice", you are a subsequent employer and this Order is binding 14 days after service of this Order.

1-0



SUPERIOR COURT OF ARIZONA, COUNTY OF PIMA

TAMMY LYNN FLORES,)
) Petitioner,)
02/04/64)
) D.O.B.) SSN)
 vs.)
)
)
) ROBERT STEWART FLORES,)
) Respondent,)
02/24/61)
) D.O.B.) SSN)

FILED
 Case No. D-112333
 96 OCT -7 PM 5:06
 CHILD SUPPORT ORDER
 JAMES N. CONE, FTT
 CLERK SUPERIOR COURT
 BY *WJ*
 DEPUTY
 William Curtis

THE COURT FINDS THAT:

1. The parties owe a duty to support the following children:

Name	Date of Birth	Social Security No.
Casey Alexander Flores	02/25/87	
Dakota Ryan Flores	06/12/92	

2. The parties' circumstances are as follows:

	FATHER	MOTHER	COMBINED
Gross Income.....	1600	-0-	
Spousal Maintenance Paid.....			
Child Support Paid.....			
Adjustment for Supporting other children.....			
Adjusted Gross Income.....	1600	-0-	1600
Basic Child Support Obligation.....			420
Medical Insurance Premium			
Child Care.....			
Extra Education.....			
Child(ren) Over 12.....			
Extraordinary Child.....			
Total Child Support Obligation.....			420
Proportionate Share of Income.....	100 %	-0- %	
Each Parent's Support Obligation....	420	-0-	
Adjustment for Physical Custody.....			
Medical Insurance Premium Adjustment			
Support Amount.....	420		

(Not less than \$50 absent deviation)

M-O (R)

3. Obligor's employer/payor is:
Name: St. Joseph's Hospital
Payroll Dept. Address: 350 N. Wilmot Road
Tucson, Arizona

4. Written Findings for Physical Custody Adjustment or other adjustments:

5. Written Findings for Deviation Pursuant to Guidelines Section is:

IT IS ORDERED THAT:

A. Petitioner X Respondent shall pay child support of \$420.00 per month. If this is a modification of child support, all other prior orders of this court not modified herein remain in full force and effect.

The first payment is due October 1, 1996. Payments shall be made through the Clerk of the Court/Clearinghouse pursuant to an Order of Assignment signed this date.

At any time the obligor's employer/payor is not paying pursuant to an Order of Assignment, the obligor must make full and timely payment directly to the Clerk of the Court/Clearinghouse.

Payments not made through the Clerk of Court/Clearinghouse shall be considered gifts unless otherwise ordered. Payments must include the case number.

B. Unless the court has ordered otherwise, the parties affected by this order shall notify the Clerk of the Court/Clearinghouse of their addresses and shall notify the Clerk/Clearinghouse of any change of address within ten (10) days. The obligor shall also notify the Clerk/Clearinghouse of the names and addresses of the obligor's employers or other payors and, within 10 days, of any changes thereof.

C. X Petitioner Respondent is responsible for providing medical insurance for the children.

 X Petitioner X Respondent shall pay 50 % of any uninsured medical expenses and the other party shall pay the remainder.

M-0



D112333

D. The cost of visitation-related travel/transportation shall be shared by the parents as follows:

Father: 100% Mother: _____

E. Every 24 months the parties shall exchange financial information such as copies of the Parent's Worksheet, tax returns, or earnings statement, etc.

X Every 24 months the parties shall exchange residential addresses and the names and addresses of their employers.

____ Other Orders.

DATE: 10-7-96

[Signature]
Judge or Commissioner

Check the items that apply to this Order

- X Establishment
- ____ Modification _____ Up _____ Down
- ____ Income above schedule amounts
- ____ More than 6 children
- ____ \$50 minimum, Guideline amount lower
- ____ Guideline amount awarded X Yes _____ No
- If deviation, based on:
 - ____ Court findings (15.a)
 - ____ Agreement of parties (15.b)

Document Submitted By: Jean Moskow, Esq.
BUTLER & STEIN, P.C.
110 S. Church, Suite 9300
Tucson, Arizona 85701



1 Jean Moskow, Esq.
2 BUTLER & STEIN, P.C.
3 110 South Church Ave.
4 Suite 9300
5 Tucson, Arizona 85701
6 (602) 628-1618
7
8 Pima County Computer No. 64512
9 Attorney for Petitioner

FILED
96 OCT -7 PM 5:06
JAMES H. COLLETT
CLERK OF SUPERIOR COURT
BY *[Signature]*
DEPUTY
William Curtis

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

9 In re the Marriage of:)
10 TAMMY LYNN FLORES,)
11)
12) Petitioner,)
13 vs.)
14) ROBERT STEWART FLORES,)
15) Respondent.)

NO. D-112333
PENDENTE LITE
STIPULATION AND ORDER
(Child Custody, Support
and Visitation)

16 THE PARTIES to the above captioned matter, through their
17 undersigned counsel, hereby stipulate to the following
18 provisions, *pendente lite*:

19 1. Custody. Petitioner shall have sole custody of the
20 parties' minor children, with no prejudice to either party
21 seeking joint or sole custody at a later date.

22 2. Visitation. Respondent shall have the following
23 rights of visitation, *pendente lite*:

24 Alternating weekends, from Saturday at
25 10:00 a.m. until Sunday at 5:00 p.m.

26 ...

28 V-O (R)

A
BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520)628-1618
O

D112333

1 3. Visitation Exchanges. Respondent shall be
2 responsible for transportation to and from Petitioner's home
3 in Sierra Vista, Arizona.

4 4. Child Support. Respondent shall, *pendente lite*, pay
5 Petitioner **FOUR HUNDRED TWENTY DOLLARS (\$420.00)** per month as
6 and for child support as of October 1, 1996. Such amount
7 shall be paid through the Clerk of the Court, pursuant to wage
8 assignment, and Respondent agrees to pay Petitioner directly
9 until the aforesaid assignment takes effect.

10 DATED this 4 day of October 1996.

11 BUTLER & STEIN, P.C.

LAW OFFICE OF LYNN ELAINE SAUL

12
13 Jean Moskowitz
14 Jean Moskowitz
Attorney for Petitioner

Lynn Elaine Saul
Lynn Elaine Saul
Attorney for Respondent

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520)628-1618

16 ORDER

17 Having read the above stipulation, and good cause
18 appearing therefor,

19 IT IS SO ORDERED.

20 DATED this 7 day of Oct 1996.

21
22 Richard D. Nichols
23 Richard D. Nichols, Judge
Pima County Superior Court

27 M-O

28 (R)

FILED

96 OCT 15 AM 6:52

JAMES H. CORBETT
CLERK OF SUPERIOR COURT
BY *Judy Fine*
DEPUTY

D-112333

Tammy Lynn Flores

-VS-

Robert Stewart Flores

P 406 738 626

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
ST. JOSEPH'S HOSPITAL	
PAYROLL	
350 N. WILMOT RD.	
TUCSON, AZ. 85710	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date D 112333 ROBERT STEWART FLORES	

P/A

PS Form 3800, April 1995

FD-36

SEND PAYMENTS TO:
Clearinghouse
P.O. Box 40468
Phoenix, AZ 85067

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
Division of Child Support Enforcement

FILED

96 OCT 17 PM 4:36 REQUEST TO FILE ASSIGNMENT OF RIGHTS TO SUPPORT/
REQUEST COPIES OF COURT ORDERS AND PAYMENT RECORD

JAMES N CORBETT
CLERK SUPERIOR COURT
BY Janet Thomas
HEPITY

TO: PIMA COUNTY
CLERK OF THE SUPERIOR COURT
110 WEST CONGRESS STREET, 1ST FLOOR
TUCSON, ARIZONA 85701

D112333
L TAMMY FLORES
VS. ROBERT FLORES

SEND COURT ORDERS/PAYMENT RECORDS TO ADDRESS BELOW:

FROM: COCHISE COUNTY ATTORNEY
CHILD SUPPORT DIVISION
P.O. DRAWER CA
BISBEE, ARIZONA 85603

FOR DCSE USE			
ISSUE DATE	SUSPENSE DATE	A-R CARE	NPA CASE
09/18/96		XX	
CUSTODIAL PARENT'S NAME			
TAMMY FLORES			
CUSTODIAL PARENT'S FILE NO.			
0004944518-00			
NON-CUSTODIAL PARENT'S NAME			
ROBERT S. FLORES			
NON-CUSTODIAL PARENT'S SOC. SEC. NO.			
[REDACTED]			
CASE/DOCKET NO.			
D-112333			
RE:			
TAMMY FLORES VS. ROBERT S. FLORES			
TYPE OF ORDER AND DATE			
DIVORCE			

The State of Arizona is providing public assistance in the form of Aid to Families with Dependent Children (AFDC) to the child(ren) of the above named non-custodial parent. The custodial parent has assigned his/her and the child(ren)'s rights to support to this state. Pursuant to 45C.F.R.302.32 of the Title IV-D Child Support Enforcement Program and 12 A.R.S. 245 7(B), we request that you file the enclosed "Notice of Assignment of Rights to Support" (FA-173-A) and forward any support payments.

In addition, to establish and accurately complete our records for the above Title IV-D case, please provide Certified Non-Certified copies of all court orders pertaining to this case, including, but not limited to, Divorce Decrees, Judgments, Contempt Orders, and all modifications. Also please provide Certified Non-Certified copies of your payment records.

Thank you for your cooperation.

DCSE REPRESENTATIVE'S SIGNATURE

Aurelia Blaine

DATE

09/18/96

AURELIA BLAINE/CHILD SUPPORT OFFICER/AFDC

COURT OR AGENCY RESPONSE (Complete and return to address at the top. Retain copy for your records.)

- We WILL honor the "Notice of Assignment of Rights to Support" and forward all subsequent support payments made to: Clearinghouse, P.O. Box 40468 • Phoenix, AZ 85067.
- We CANNOT honor the "Notice of Assignment of Rights to Support" because _____

If you have been ordered to direct support payments to another jurisdiction, please indicate which jurisdiction.

- Certified Non-Certified copy of the support court order(s) and/or divorce decree are enclosed.
- We have no record(s) of a support court order(s).
- Other (explain) _____

- Enclosed is the Certified Non-Certified copy of our record of payments.
- We have a case record and certify that no payments have been received.
- We certify that we have no case record.

COURT/AGENCY REPRESENTATIVE'S SIGNATURE

DATE

H-R

Completion Instructions for CS-104
**REQUEST TO FILE ASSIGNMENT OF RIGHTS TO SUPPORT/
REQUEST COPIES OF COURT ORDERS AND PAYMENT RECORD**

- A. Purpose. To request a Court, or appropriate Agency, to file the "Notice of Assignment of Rights to Support" and to provide copies of Court Orders and Payment Records.
- B. Completion. Original and four copies are completed by the DCSE.
- C. Routing. Original and copy to Court/Agency. Copy to IV-D file until Court/Agency's response is received. Third and fourth copies to the Suspense File.
- D. Retention. Copies are retained in the respective IV-D files until the files are destroyed.

BISBEE, ARIZONA 85803
P. O. DRAWER 2A
CHILD SUPPORT DIVISION
COCHISE COUNTY ATTORNEY

MR

FILED
JAMES N. CORRETT
CLERK SUPERIOR COURT

96 NOV -4 PM 8:59
NOV 04 1996

V. ARMY
DEPUTY

D 112333

Tammy L. Flores

vs.

Robert S. Flores

Is your RETURN ADDRESS completed on the reverse side?

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, 4a, and 4b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input checked="" type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: ST. JOSEPH'S HOSPITAL ATTN: PPAYROLL 350 N. WILMOT RD. TUCSON, AZ. 85710 D 112333 R. FLORES		4a. Article Number P 406 738 626	
5. Received By: (Print Name)		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input checked="" type="checkbox"/> COD	
6. Signature: (Addressee or Agent) <i>[Signature]</i>		7. Date of Delivery NOV 04 1996	
PS Form 3811, December 1995		8. Addressee's Address (Only if requested and fee is paid)	

Domestic Return Receipt

Thank you for using Return Receipt Service.

M-R

ARIZONA SUPERIOR COURT, PIMA COUNTY

FILED
JAMES N. CORBETT
CLERK SUPERIOR COURT

FLORES, TAMMY L
Petitioner

98 NOV 13 AM 11:56

vs.

FLORES, ROBERT S
Respondent

BY: E. BRADFORD.
DEPUTY

CASE NO. D -112333

DATE: 11/08/96

ORDER TO APPEAR FOR MEDIATION:

It appearing there is an issue of custody or visitation, pursuant to Rule 8.7, Pima County Local Rules,

IT IS ORDERED that the parties shall appear for mediation at 8:15 A.M. on the 5th day of DECEMBER, 1996, at The Family Center of the Conciliation Court (FCCC), The Great American Tower, 32 N. Stone Avenue, 17th Floor, Room 1704, Tucson, Arizona.

SI NECESITA UN MEDIADOR QUE HABLE ESPANOL, POR FAVOR LLAME A 740-5590 IMMEDIATAMENTE. IF YOU NEED A SPANISH SPEAKING MEDIATOR, PLEASE CALL 740-5590 IMMEDIATELY.

YOUR FAILURE TO APPEAR WILL RESULT IN THE ISSUANCE OF A CIVIL WARRANT FOR YOUR ARREST AND OTHER SANCTIONS, INCLUDING FINES, DISMISSAL, CONTEMPT OF COURT, AND INCARCERATION.

Gordon T. Alley

Judge/Court Commissioner

Stamp

Enclosure: SUPPLEMENTAL MEDIATION ORDER

cc: Hon. Gordon T. Alley
MM Conciliation Court
Court Administrator
FLORES, TAMMY L
FLORES, ROBERT S
JEAN K MOSKOW, Attorney at Law
MM LYNN ELAINE SAUL, Attorney at Law

D -112333

ML

CASE NO. D -112333

DATE: 11/08/96

FLORES, TAMMY L

VS.

FLORES, ROBERT S

112333

SUPPLEMENTAL MEDIATION ORDER

You have been ordered into mediation. A trial on the issues of custody and/or visitation is continued until the mediation is completed. If either party fails to appear, no mediation can occur and, further, because of short notice, no other persons will be available to fill this reserved time. Be prepared to stay at least four (4) hours.

The parties shall cooperate fully with the mediator, complete any and all forms requesting information, attend all scheduled sessions, and adhere to the procedures for mediation. NO CHILDREN are to be brought to the mediation sessions unless requested by the mediator.

The mediator shall notify the Court when mediation has concluded and whether the mediation has been successful. Pursuant to Rule 8.7(k), all mediation proceedings are confidential. However, agreements may be submitted by the parties or their counsel to the Court for approval.

If the parties desire private mediation at their own expense, the Conciliation Court must be so advised within ten (10) days of the date of this Court Order to Appear for Mediation.

If the parties resolve the custody and/or visitation issues at least forty-eight (48) hours prior to the mediation session, the parties or their attorneys must prepare and submit to the Court a signed stipulation setting forth the terms of the agreement. If the Court approves the stipulation, the Order to Appear for Mediation will be vacated. THIS CANNOT BE ACCOMPLISHED BY A PHONE CALL.

If the parties resolve the custody and/or visitation issues less than forty-eight hours (48) prior to the mediation session, they SHALL APPEAR at the time set for mediation and incorporate their agreements into a written memorandum to be submitted to the Court for approval.

PARTIES MUST APPEAR UNLESS EXCUSED BY WRITTEN COURT ORDER.

Gordon T. Alley

Judge/Court Commissioner

Stamp

cc: Hon. Gordon T. Alley
Conciliation Court
Court Administrator
FLORES, TAMMY L
FLORES, ROBERT S
JEAN K MOSKOW, Attorney at Law
LYNN ELAINE SAUL, Attorney at Law

ML

ARIZONA SUPERIOR COURT, PIMA COUNTY

TAMMY LYNN FLORES, Petitioner ROBERT STEWART FLORES, Respondent	NO. D-112333 MOTION TO SET AND CERTIFICATE OF READINESS	FILED JAMES N. CORBETT CLERK OF SUPERIOR COURT 97 JAN 14 PM 5:01 V. ARMY DEPUTY
--	---	--

- | | | |
|--|------------------------------------|---|
| <input type="checkbox"/> Tort Motor Vehicle | INDICATE NATURE
OF CASE | <input type="checkbox"/> Real Property |
| <input type="checkbox"/> Tort Non-Motor Vehicle | | <input type="checkbox"/> An Appeal |
| <input type="checkbox"/> Contract | | <input type="checkbox"/> Non-Classified Civil |
| <input checked="" type="checkbox"/> Domestic Relations | | <input type="checkbox"/> Medical Malpractice |
| <input type="checkbox"/> Probate | | <input type="checkbox"/> _____ |

I request that the above-numbered case be set for trial and certify that:

- The petition was filed on August 15, 1996, and thereafter a response was filed and the issues joined.
- The parties have completed, or will have had a reasonable opportunity to complete ten days prior to trial, all procedures intended to be undertaken under Rules 26 to 37 of the Rules of Civil Procedure.

3. The estimated length of trial is 1 Hr(s) Day(s)

4. Jury trial demanded. Yes No

5. The largest award sought by any party, including punitive damages, but excluding interest, attorneys' fees, and costs, is \$ _____

This case is subject to arbitration. Yes No

6. The case is entitled to trial preference. If "Yes", cite the court order, statute or rule: Yes No

7. A copy of this Motion and Certificate has been: delivered mailed to:

Name	Address	Phone	Attorney for
Lynn Elaine Saul	100 N. Stone, #602 Tucson, Arizona 85701	882-6226	Respondent

A COPY OF THIS MOTION MUST BE FILED WITH THE COURT ADMINISTRATOR'S OFFICE

Barbara Magee, Esq.
 BUTLER & STEIN, P.C.
 110 S. Church, Suite 9300
 Tucson, Arizona 85701
 (602) 628-1618
 Computer No. 07552

Dated: January 13, 1997

Barbara Magee
 Attorney for Petitioner

ML

4 ✓
ARIZONA SUPERIOR COURT, PIMA COUNTY

FILED
JAMES H. CORBETT
CLERK SUPERIOR COURT

Case No. D-112333

97 FEB -6 AM 8:51

Regarding the Marriage of:

TAMMY LYNN FLORES,
Petitioner

Individually Assigned To:
BY: H. MULHOLLAND, DEPUTY HON. RICHARD NICHOLS

ROBERT STEWART FLORES,

Respondent

DOMESTIC RELATIONS TRIAL NOTICE

YOU ARE NOTIFIED that the above matter has been set as follows:

Joint Pretrial Statements are due on: March 13, 1997

Domestic Settlement Conference on: March 24, 1997
Consult daily calendar for location.

Court Trial: April 2, 1997 at 10:00 a.m. Estimated time for trial is 1 day.

PLEASE NOTE that pursuant to Rules 8.2, 8.3 and 8.5, Local Rules of Practice for Domestic Relations cases, **YOU MUST:**

1. Appear at the Settlement Conference with your client;
2. File a **JOINT** Pretrial Statement, including a current financial affidavit and inventory of property, **with a copy to Calendar Service and the assigned Judge**, not less than 20 days prior to trial.

Failure to do so will result in dismissal, placement on the inactive calendar, and/or sanctions being imposed.

If this matter settles or proceeds as a default, please contact this Division at **740-3567** to avoid the need to appear at the Settlement Conference.

Note: All custody and visitation disputes are subject to mandatory mediation pursuant to Local Rules of Practice, Rule 8.7. No trial or post-decree hearing will proceed until the parties have attended mediation. Counsel or the parties shall advise the Court if a mediation appointment is required by calling 740-5590.

Dated: February 5, 1997.

Raquel Fleischman
Judicial Administrative Assistant

CC: Hon. Richard Nichols
Calendar Services
Barbara Magee, Esq.
Lynn Elaine Saul, Esq.

M-A

FEB
6
REC'D

A 112333

NOTICE

To: All Counsel and Litigants with cases assigned to Division 14

Rule 8.5, Rules of Practice, Pima County Superior Court provides as follows:

8.5 Pre-trial or Pre-hearing Statement

(a) Preparation, signing and filing of Statements.

In every domestic relations case set for trial, including any bifurcated portion of such trial and all post-decree hearings for modification of child custody, counsel who will try the case for the parties and who are authorized to make binding stipulations on behalf of the parties shall meet personally and prepare a written pre-trial or pre-hearing statement, signed by each counsel, which is to be filed with the Court not later than twenty (20) days prior to the date set for trial or hearing. In the event that the parties are unable to agree on a joint pre-trial statement after making a good faith effort to do so, any party may file a separate or individual pre-trial statement setting forth the information required by Rule 8.5. A copy of the statement (whether joint or individual) shall be filed with Calendar Service at the time the original is filed with the Clerk. Failure to comply with the rule may result in the imposition of interim relief as set forth in Rule 8.5(d) or any other sanctions provided by Rule 8.6

Please be advised that the requirements of the foregoing rule will be strictly enforced.

Richard Nichols
Judge of the Superior Court

M-A

ARIZONA SUPERIOR COURT, PIMA COUNTY

FILED

TAMMY LYNN FLORES
Petitioner

CASE NO. D-112333

97 FEB 13 PM 4:52

ROBERT STEWART FLORES
Respondent

STIPULATION AND ORDER FOR

Custody Agreement or
Evaluation
 Visitation Agreement
or Evaluation
 Counseling only, no report

JAMES N. CORBETT
CLERK SUPERIOR COURT
DEPUTY

Counsel stipulate that this matter be referred to the Child Advocacy Counselor and Staff and the Family Center of the Conciliation Court (FCCC) to screen the case to determine if it is appropriate for evaluation according to the criteria set forth by the Conciliation Court. If appropriate, an evaluation may be conducted. The parties shall appear at all conferences scheduled by FCCC and shall furnish all information requested by the counselor. At the completion of the evaluation, a report with recommendations will be submitted to the Court, with copies to the attorneys, which report shall become a matter of record in the Court file, to remain sealed unless ordered opened by a Judge or Commissioner. The Court shall consider the submitted report and recommendations in determining custody and/or visitation. Neither the counselor nor any FCCC staff will be subject to questioning or being called as a witness, nor will any FCCC records, case notes, or other communications collected on the case be subject to subpoena. In the course of the evaluation, if an agreement is reached by the parties regarding custody and/or visitation arrangements that would be in the best interest of the children, the counselor shall submit a brief report to the Court summarizing the parents' participation, including the agreement reached by the parents and recommendations of the counselor. Copies of said report to be sent to attorneys.

IT IS HEREBY FURTHER STIPULATED:

- That either party may present additional testimony should further litigation be necessary,
- That the report and/or recommendations will be submitted to the Court without further testimony.
- That this matter is continued subject to call.
- That the trial/hearing on this matter is continued to _____.

DATED February 12, 1997

B. Maguer
Attorney for Petitioner
Petitioner's Name Tammy Lynn Flores
Mailing Address 357D South Carmichael
Sierra Vista, AZ 85635
Daytime Phone No. 520-458-5277

Yvonne Elaine Saul
Attorney for Respondent
Respondent's Name ROBERT FLORES
Mailing Address 7014 E. Golf Links #202
Tucson AZ 85730-1064
Daytime Phone No. 670-8173 (pgr)

ORDER

Pursuant to the foregoing Stipulation, IT IS SO ORDERED.

cc: Conciliation Court
Attorney for Petitioner
Attorney for Respondent
Court Administrator
Judge/Commissioner

F. Nichols
JUDGE/COURT COMMISSIONER Date



BOOK 5273 PAGE 056

DR-6/12-90

FILED
JAMES N. CORBETT
CLERK SUPERIOR COURT

97 MAR -5 PM 4:37

3-5-97

BY: E. BRADFORD,
DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL
3 100 N. Stone Avenue, Suite 602
4 Tucson AZ 85701
5 (520) 882-6226
6 Fax (520) 882-7678
7 State Bar # 3343
8 Pima County Comp. # 40164
9 Attorney for Respondent

10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
11 IN AND FOR THE COUNTY OF PIMA

12 In re the Marriage of

13 TAMMY LYNN FLORES

14 Petitioner,

15 and

16 ROBERT STEWART FLORES

17 Respondent.

No. D-112333

STIPULATION and ORDER TO
CONTINUE TRIAL

(Assigned to Hon. Richard
Nichols)

18
19
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27
28
Petitioner TAMMY LYNN FLORES, by her attorney, BARBARA MAGEE, and
Respondent ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
SAUL, hereby stipulate that the Trial in this matter (now set for
April 2, 1997), as well as the dates for filing the Joint Pretrial
Statement (March 13, 1997) and for the Domestic Settlement
Conference (March 24, 1997), be continued for approximately four
(4) months, for the reason that the parties have stipulated to a
custody agreement or evaluation with Conciliation Court, and the

MAN

BOOK 5286 PAGE 457



D-112333

1 first appointment in that process is scheduled for March 12, 1997
2 and is likely to continue for several months.

3
4 Dated this 27th day of February, 1997.

5
6 B Magee
7 BARBARA MAGEE
8 Attorney for Petitioner

Lynn Elaine Saul
LYNN ELAINE SAUL
Attorney for Respondent

9 ORDER

10
11 UPON STIPULATION OF COUNSEL, and good cause appearing,
12 IT IS ORDERED that the trial in this matter set for April 2, 1997,
13 as well as the Joint Pretrial Statement due date of March 13, 1997
14 and the Domestic Settlement Conference date of March 24, 1997, are
15 hereby continued to:

16 TRIAL Aug 5, 1997 (Estimated time 1 day)

17 JOINT PRETRIAL STATEMENT DUE: July 16, 1997

18 DOMESTIC SETTLEMENT CONFERENCE: July 28, 1997

19 DATED this 4 day of May 1997.

20
21 F. Nichols
22 JUDGE OF THE SUPERIOR COURT

23
24
25 MAN



1 Barbara Magee, Esq.
2 BUTLER & STEIN, P.C.
3 110 South Church Ave.
4 Suite 9300
5 Tucson, Arizona 85701
6 (602) 628-1618
7 Pima County Computer No. 64616
8 Attorney for Petitioner

FILED
97 MAY -7 PM 4 22

JAMES N. SOBETT
CLERK SUPERIOR COURT
BY *[Signature]*
DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

9 In re the Marriage of:)
10)
11 TAMMY LYNN FLORES,) NO. D-112333
12)
13) Petitioner,) MOTION, CONSENT AND
14)) ORDER FOR WITHDRAWAL
15)) OF COUNSEL
16 vs.)
17)
18 ROBERT STEWART FLORES,)
19)
20) Respondent.)

21 Barbara Magee, of the law offices of BUTLER & STEIN, P.C.,
22 hereby request that this court issue its order permitting the
23 firm of BUTLER & STEIN, P.C. to withdraw as counsel of record
24 for TAMMY LYNN FLORES, Petitioner in the above-referenced
25 matter for irreconcilable differences between attorney and
26 client, which prohibit the firm of BUTLER & STEIN, P.C. from
27 continuing to represent said parties. The parties are involved
28 in Conciliation Court evaluations; the trial is presently set
for August 5, 1997, Settlement Conference for July 28, 1997,
and Pretrial Statements are due July 16, 1997.

RESPECTFULLY SUBMITTED this 5th day of May, 1997.

BUTLER & STEIN, P.C.

[Signature]
Barbara Magee
Attorney for Petitioner



BOOK 5336 PAGE 370

M-H

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

CIVIL

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

1 In re the Marriage of:
2 TAMMY LYNN FLORES and
3 ROBERT STEWART FLORES; D-112333
4 Motion, Consent and Order for
5 Withdrawal of Counsel

6 **C O N S E N T**

7 TAMMY LYNN FLORES, the Petitioner in the above-captioned
8 case, does hereby consent to the withdrawal of counsel as
9 reflected in the above Motion for Withdrawal of Counsel.

10 DATED this 21 day of April, 1997

11 
12 TAMMY LYNN FLORES

13 **O R D E R**

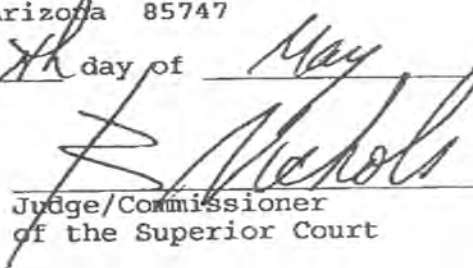
14 Upon review of the foregoing Motion and good cause
15 appearing,

16 **IT IS HEREBY ORDERED** that BUTLER & STEIN, P.C. be and is
17 hereby withdrawn as counsel of record for Petitioner, TAMMY
18 LYNN FLORES, in the above-captioned case.

19 **IT IS FURTHER ORDERED** that all pleadings should be mailed
20 directly to the Petitioner at the address listed below:

21 Tammy Lynn Flores
22 357D South Carmichael
23 Sierra Vista, AZ 85635
24 Tucson, Arizona 85747

25 DONE IN OPEN COURT this 21 day of May, 1997.

26 
27 Judge/Commissioner
28 of the Superior Court



M-H

BOOK 5336 PAGE 371

D 112333
112333

1 In re the Marriage of:
2 TAMMY LYNN FLORES and
3 ROBERT STEWART FLORES; D-112333
4 Motion, Consent and Order for
5 Withdrawal of Counsel

6 COPY of the foregoing mailed this
7 5 day of May, 1997, to:

8 Lynn Saul, Esq.
9 110 N. Stone Avenue, #602
10 Tucson, AZ 85701
11 Attorney for Respondent

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BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(602) 628-1618

M-H (R)

CAROL WILSON
Attorney at Law
3210 E. Ft. Lowell, Suite 104
Tucson AZ 85716
Tel: [520] 325-3408
Fax: [520-325-4021]

Attorney for Petitioner

FILED
97 MAY -8 PM 4: 39
JAMES N. CORBETT
CLERK OF SUPERIOR COURT
BY *Carol Wilson*
DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN
AND FOR THE COUNTY OF PIMA

In re the Marriage of:)	
TAMMY LYNN FLORES)	No. D-112333
Petitioner)	
vs.)	NOTICE OF APPEARANCE
)	
ROBERT STEWART FLORES)	(JUDGE NICHOLS)
Respondent)	

COMES NOW CAROL WILSON, Attorney at Law and enters her appearance on behalf of TAMMY LYNN FLORES, Petitioner in this action.

Carol Wilson
CAROL WILSON

A

Copy of the foregoing served by mail this 5th day of May, 1997 to:

LYNN ELAINE SAUL, Esq.
100 N. Stone Ave. Suite 602
Tucson AZ 85701

Clerk of the Superior Court
110 W. Congress
Tucson AZ 85701

CIVIL

M-H

CAROL WILSON
Attorney at Law
3210 E. Ft. Lowell, Suite 104
Tucson AZ 85716
Tel: [520] 325-3408
Fax: [520-325-4021]

Attorney for Petitioner

FILED
JAMES N. CORBETT
CLERK SUPERIOR COURT
97 JUL -8 PM 7:12

V. ARMY
DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN
AND FOR THE COUNTY OF PIMA

In re the Marriage of:)	
)	No. D-112333
TAMMY LYNN FLORES)	
Petitioner)	
vs.)	OPPOSITION TO MOTION
)	TO CONTINUE TRIAL DATE
ROBERT STEWART FLORES)	[Assigned to Judge Nichols]
Respondent)	

PETITIONER, TAMMY LYNN FLORES, through counsel undersigned objects to a continuance of the trial date and date for settlement conference on the following grounds:

1. This is the second continuance requested in this matter. The case originally was filed in August 1996.
2. The resetting of the Conciliation Court interviews were through no fault of Petitioner.
3. Certain of Petitioner's witnesses reside in the State of Texas and have previously made arrangements to schedule their vacation times with their employers. They will not be able to reschedule vacations and may therefore be unable to appear on behalf of Petitioner. In particular, Petitioner's parents who are as well acquainted with the facts as anyone except the parties, may well be unable to attend the continued trial.

MR. 1

4. Petitioner has no objection to stipulating that the pre-trial statement may be filed on the morning of the scheduled settlement conference in order to accommodate Respondent's counsel.

5. Petitioner is thus forced to withdraw from the conciliation court evaluation process in order to ensure that she may obtain necessary testimony at trial which testimony will support her claim for sole custody of the minor children and without which Petitioner's ability to present favorable evidence will be jeopardized.

Attached is a letter to the conciliation court indicating Petitioner's withdrawal from the program. Thus there is no longer a necessity for a continuance.

Respectfully submitted this 8th day of July, 1997


CAROL WILSON
Attorney for Petitioner

Copy faxed/mailed July 8th 1997
to:
LYNN SAUL, Esq.
100 N. Stone, Suite 602
Tucson AZ 86701

M-R

D112333

CAROL WILSON
Attorney at Law
3210 E. Ft. Lowell, Suite 104
Tucson AZ 85716
Tel: [520] 325-3408
Fax: [520-325-4021]

July 8, 1997

Grace M. Hawkins, ACSW, CISW
Conciliation Court
32 N. Stone Suite 1704
Tucson AZ 85701-1403

Re: Flores and Flores

Dear Grace,

As you know, I represent Tammy Flores. Ms. Saul, attorney for Robert Flores has requested a continuance of the trial date because the custody evaluation will not be completed before the August 5th trial date.

Therefore Tammy must withdraw from the conciliation evaluation process and does so by this letter. Her witnesses from Texas have arranged their vacations with their employers and cannot change them. Tammy feels she must have family members available to testify at trial.

Thank you for your cooperation in the matter. I believe the first continuance should have been for a longer period in order to accommodate the conciliation process.

Yours truly,

Carol Wilson
cc: Ms. Flores
Lynn Saul, Esq.

M-R

97 JUL -8 PM 7:12

V. ARMY
DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL
3 100 N. Stone Avenue, Suite 602
4 Tucson AZ 85701
5 (520) 882-6226
6 Fax (520) 882-7678
7 State Bar # 3343
8 Pima County Comp. # 40164
9 Attorney for Respondent

10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

11 IN AND FOR THE COUNTY OF PIMA

12 In re the Marriage of)

13 TAMMY LYNN FLORES)

14 Petitioner,)

15 and)

16 ROBERT STEWART FLORES)

17 Respondent.)

No. D-112333

REPLY TO PETITIONER'S
OPPOSITION TO
RESPONDENT'S MOTION TO
CONTINUE TRIAL and
REQUEST FOR ORDER THAT
THE PARTIES CONTINUE IN
EVALUATION PROCESS

(Assigned to Hon. Richard
Nichols)

18 Respondent ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
19 SAUL, hereby replies to the Opposition to Motion to Continue Trial
20 Date filed by Petitioner and the attached letter from Petitioner to
21 Conciliation Court withdrawing from the conciliation evaluation
22 process, as follows:

23 I. The parties stipulated to the Conciliation Court evaluation
24 process on February 12, 1997, and the process was ordered by
25 the Court. Petitioner has no legal authority to unilaterally
26 withdraw from the evaluation process.

27 II. Petitioner's Opposition to Motion to Continue is based on the
28 fact that she has witnesses for trial who have made vacation

M-R

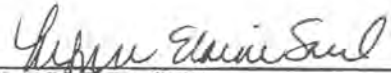
D112333

1 plans to be in Tucson for the August 5, 1997 trial date. As
2 a result, she is trying to unilaterally withdraw from the
3 evaluation process and proceed to trial. These reasons do not
4 serve the interests of justice.

5 III. The next session in the evaluation process is a family session
6 scheduled for July 21, 1997. Petitioner should be ordered to
7 attend that session.

8 WHEREFORE Respondent requests this Court to Order that Petitioner
9 continue in the evaluation process, and that the trial of this
10 matter be continued as previously requested in the Motion to
11 Continue filed on July 7, 1997.

12 Dated July 8, 1997.

13
14 
15 LYNN ELAINE SAUL
Attorney for Respondent

16 Copy faxed/mailed July 8, 1997 to:
17 CAROL WILSON
18 3210 E. Ft. Lowell, Suite 104
19 Tucson AZ 85716
20 FAX 325-4021
21 Attorney for Petitioner
22
23
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27
28

M-E

[Handwritten mark]

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE: HON. RICHARD NICHOLS

CASE NO. D-112333

COURT REPORTER: NONE

DATE: July 9, 1997

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES
Petitioner

Carol Wilson (telephonically)
Petitioner's Attorney

and

ROBERT STEWART FLORES
Respondent

Lynn Elaine Saul (telephonically)
Respondent's Attorney

REC'D
JUL 9 1997

MINUTE ENTRY

RESPONDENT'S MOTION TO CONTINUE TRIAL:

Ms. Saul makes statements to the Court.

Ms. Wilson objects to a continuance.

IT IS ORDERED that the motion to continue is denied.

IT IS FURTHER ORDERED affirming the trial date of August 5, 1997.

IT IS FURTHER ORDERED vacating the Settlement Conference set for July 28, 1997 and resetting to August 4, 1997.

IT IS FURTHER ORDERED that Pretrial statements may be filed as late as August 1, 1997.

IT IS FURTHER ORDERED that Conciliation Court provide the information that they have gathered from all sources to both counsel.

Cc: Hon. Richard Nichols
Domestic Calendaring
Conciliation Court
Carol Wilson, Esq.
Lynn Elaine Saul, Esq.

Pat Dini
Deputy Clerk

FILED
July 9 1997
JAMES N. CORBETT, Clerk

1 Law Office of
2 LYNN ELAINE SAUL
3 100 N. Stone Avenue, Suite 602
4 Tucson AZ 85701
5 (520) 882-6226
6 Fax (520) 882-7678
7 State Bar # 3343
8 Pima County Comp. # 40164
9 Attorney for Respondent

10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
11 IN AND FOR THE COUNTY OF PIMA

12 In re the Marriage of)
13 TAMMY LYNN FLORES) No. D-112333
14 Petitioner,) MOTION TO CONTINUE TRIAL
15 and) (Assigned to Hon. Richard
16 ROBERT STEWART FLORES) Nichols)
17 Respondent.) (Oral Argument Requested)

18 Respondent ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
19 SAUL, hereby moves to continue the Trial in this matter (now set
20 for August 5, 1997), as well as the dates for filing the Joint
21 Pretrial Statement (July 16, 1997) and for the Domestic Settlement
22 Conference (July 28, 1997), until approximately November 1997, for
23 the reason that the parties are currently involved in a custody
24 agreement or evaluation proceeding with Conciliation Court, and the
25 appointments in that process are scheduled at least through August
26 14, 1997 at the present time, and additional or rescheduled
27 appointments may be necessary, as well as time for the parties to
28 negotiate an agreement or for the evaluators to prepare their
report. Grace Hawkins, ACSW, CISW, one of the Conciliation Court

M-R

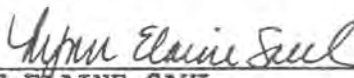
1 evaluators, has advised counsel that, should a report be necessary,
2 it will not be able to be finished until late October, 1997.
3 Depending on the results of the evaluation, the parties may need to
4 develop additional relevant expert testimony or other evidence
5 prior to filing the Joint Pretrial Statement.

6 The undersigned attorney for Respondent requested a
7 stipulation on this continuance from the attorney for Petitioner,
8 who refused to so stipulate.

9 The interests of justice require that this matter be continued
10 until the evaluation process can be completed. The purpose for the
11 Stipulation for Custody Evaluation filed by the parties on February
12 12, 1997 was to provide the most complete, accurate, and objective
13 information to the Court concerning the best interests of the minor
14 children in this matter. Should the evaluation not be completed,
15 the Court will not have information it needs to determine the best
16 interests of the minor children, as required by A.R.S. Sec. 25-403.

17 This Motion is supported by the attached two Schedule of
18 Appointments letters from Conciliation Court, dated June 17, 1997
19 and June 20, 1997.

20 Dated this 7 day of July, 1997.

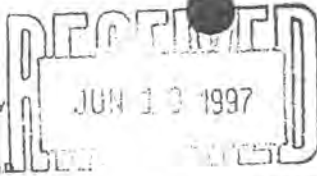
21
22 
23 LYNN ELAINE SAUL
Attorney for Respondent

24 Copy faxed/mailed July 7, 1997 to:
25 CAROL WILSON
26 3210 E. Ft. Lowell, Suite 104
27 Tucson AZ 85716
28 FAX 325-4021
Attorney for Petitioner

M-R

Hon. GORDON T. ALLEY
PRESIDING JUDGE

FREDRIC F. MITCHELL, Ph.D.
DIRECTOR



PIMA COUNTY LEGAL SERVICES BUILDING
32 N. STONE, SUITE 1704
TUCSON, ARIZONA 85701-1403

(520) 740-5590
FAX (520) 624-4034

June 17, 1997

Ms. Tammy Flores

Mr. Robert Flores

RE: Schedule of appointments

Dear Mr. and Ms. Flores:

Due to illness, the home visit that was scheduled for the mother and children on Thursday, June 12, 1997 had to be canceled. Therefore, your appointment schedule is revised. Please note the following changes:

Friday, June 27, 1997 10:30 am. to 1:00 p.m. Home Visit - Mother
(Mother, Casey and Dakota should be present at mother's home)

Friday, July 11, 1997 9:30 a.m. to 12:00 noon Family Session
(Mother, Father, Jessica Mathis, Casey and Dakota should be present at the Conciliation Court)

Monday, July 21, 1997 9:30 a.m. to 10:30 a.m. Mother

Monday, July 21, 1997 11:00 a.m. to 12:00 noon Father

Tuesday, August 5, 1997 9:30 a.m. to 12:00 noon Mother and Father

Thank you for your attention to this matter.

Sincerely,

Grace M. Hawkins, ACSW, CISW
Child Advocacy Services

Milton E. Hardin, M.A.
Child Advocacy Services

Mia Schroer-Lundeen, M.A., N.C.C.
Child Advocacy Services
Conciliation Court
MSL :clj

cc: Carol Wilson, Attorney at Law
Lynn Elaine Saul, Attorney at Law ✓

D112333

Hon. GORDON T. ALLEY
PRESIDING JUDGE

FREDRIC F. MITCHELL, Ph.D.
DIRECTOR



PIMA COUNTY LEGAL SERVICES BUILDING
32 N. STONE, SUITE 1704
TUCSON, ARIZONA 85701-1403

(520) 740-5590
FAX (520) 624-4034

June 20, 1997

Ms. Tammy L. Flores

Mr. Robert S. Flores

Re: D-112333 CV-1288

Dear Ms. and Mr. Flores:

Due to a conflict in father's work schedule, the Conciliation Court has cancelled your July 11 appointment. Therefore, we have revised your appointment schedule. Please note the changes below:

- Monday, July 21, 1997 9:30 a.m. to 12:00 noon Family Session
(Mother, Father, Jessica Mathis, Casey and Dakota should be present at the Conciliation Court)
- Tuesday, August 5, 1997 9:30 to 10:30 a.m. Mother
- Tuesday, August 5, 1997 10:30 a.m. to 11:30 a.m. Father
- Thursday, August 14, 1997 9:30 a.m. to 12:00 noon Mother and Father

Thank you for your attention to this matter.

Sincerely,

Grace Hawkins
Grace M. Hawkins, ACSW, CISW
Child Advocacy Services

Milton E. Hardin
Milton E. Hardin, M.A.
Child Advocacy Services

Mia Schroer-Lundeen
Mia Schroer-Lundeen, M.A., N.C.C.
Child Advocacy Services
Conciliation Court
MSL :clj

cc: Carol Wilson, Attorney at Law
Lynn Elaine Saul, Attorney at Law ✓



FILED
July 9 1997
JAMES N. CORBETT, Clerk
[Signature]

1 Law Office of
2 LYNN ELAINE SAUL
3 100 N. Stone Avenue, Suite 602
4 Tucson AZ 85701
5 (520) 882-6226
6 Fax (520) 882-7678
7 State Bar # 3343
8 Pima County Comp. # 40164
9 Attorney for Respondent

10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
11 IN AND FOR THE COUNTY OF PIMA

12 In re the Marriage of
13 TAMMY LYNN FLORES
14 Petitioner,
15 and
16 ROBERT STEWART FLORES
17 Respondent.

18 No. D-112333
19 MOTION TO EXPEDITE
20 HEARING ON MOTION TO
21 CONTINUE TRIAL and TO
22 HAVE MOTION HEARD
23 TELEPHONICALLY
24 (Assigned to Hon. Richard
25 Nichols)

26 Respondent ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
27 SAUL, hereby moves to expedite the hearing on his Motion to
28 Continue the Trial in this matter, for the reason that the Joint
Pretrial Statement is now due on July 16, 1997 and the Domestic
Settlement Conference is scheduled for July 28, 1997, and the
undersigned Attorney for Respondent is leaving the country on July
10, 1997 and will not return until July 28, 1997.

The undersigned Attorney for Respondent has discussed this Motion
to Expedite Hearing on Motion to Continue with Carol Wilson,
Attorney for Petitioner, who has agreed that the matter should be
heard on an expedited basis and who is willing to stipulate that
this hearing on Respondent's Motion to Continue be heard

M-R

D112333

1 telephonically if the Court is willing to do so.

2
3 Dated this 7 day of July, 1997.

4
5
6 Lynn Elaine Saul
LYNN ELAINE SAUL
Attorney for Respondent

7 Copy faxed/mailed July 7, 1997 to:
8 CAROL WILSON
9 3210 E. Ft. Lowell, Suite 104
10 Tucson AZ 85716
11 FAX 325-4021
12 Attorney for Petitioner

13 ORDER

14 UPON READING Respondent's foregoing Motion to Expedite Hearing on
15 Motion to Continue Trial, and good cause appearing,

16 IT IS ORDERED that Respondent's Motion to Continue Trial be heard
17 on the _____ day of July, 1997 at _____ am/pm, by telephonic
18 conference call to be initiated by the Court.

19 DATED this _____ day of July 1997.

20
21 RICHARD D. NICHOLS
22 Judge of the Superior Court
23
24
25
26
27
28

M-R

FILED

July 11 1997
JAMES N. CORBETT, Clerk
[Signature] Deputy

1 Law Office of
2 LYNN ELAINE SAUL
3 100 N. Stone Avenue, Suite 602
4 Tucson AZ 85701
5 (520) 882-6226
6 Fax (520) 882-7678
7 State Bar # 3343
8 Pima County Comp. # 40164

9 Attorney for Respondent

10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

11 IN AND FOR THE COUNTY OF PIMA

12 In re the Marriage of)

13 TAMMY LYNN FLORES)

14 Petitioner,)

15 and)

16 ROBERT STEWART FLORES)

17 Respondent.)

No. D-112333

REPLY TO PETITIONER'S
OPPOSITION TO
RESPONDENT'S MOTION TO
CONTINUE TRIAL and
REQUEST FOR ORDER THAT
THE PARTIES CONTINUE IN
EVALUATION PROCESS

(Assigned to Hon. Richard
Nichols)

18 Respondent ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
19 SAUL, hereby replies to the Opposition to Motion to Continue Trial
20 Date filed by Petitioner and the attached letter from Petitioner to
21 Conciliation Court withdrawing from the conciliation evaluation
22 process, as follows:

23 I. The parties stipulated to the Conciliation Court evaluation
24 process on February 12, 1997, and the process was ordered by
25 the Court. Petitioner has no legal authority to unilaterally
26 withdraw from the evaluation process.

27 II. Petitioner's Opposition to Motion to Continue is based on the
28 fact that she has witnesses for trial who have made vacation

M-R

1 plans to be in Tucson for the August 5, 1997 trial date. As
2 a result, she is trying to unilaterally withdraw from the
3 evaluation process and proceed to trial. These reasons do not
4 serve the interests of justice.

5 III. The next session in the evaluation process is a family session
6 scheduled for July 21, 1997. Petitioner should be ordered to
7 attend that session.

8 WHEREFORE Respondent requests this Court to Order that Petitioner
9 continue in the evaluation process, and that the trial of this
10 matter be continued as previously requested in the Motion to
11 Continue filed on July 7, 1997.

12 Dated July 8, 1997.

13
14 LYNN ELAINE SAUL

15 LYNN ELAINE SAUL
Attorney for Respondent

16 Copy faxed/mailed July 8, 1997 to:
17 CAROL WILSON
3210 E. Ft. Lowell, Suite 104
18 Tucson AZ 85716
FAX 325-4021
19 Attorney for Petitioner
20
21
22
23
24
25
26
27
28

M-N

CAROL WILSON
 Attorney at Law
 3210 E. Ft. Lowell, Suite 104
 Tucson AZ 85716
 Tel: [520] 325-3408
 Fax: [520-325-4021]

Post-It® Fax Note	7671	Date	7-8	# of pages	3
To	RAQUEL	From	Wilson		
cc/dst	Judge Nichols	Co.	RE FLORES		
Phone #		Phone #	325-3408		
Fax #	622 0569	Fax #			

Attorney for Petitioner

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN
 AND FOR THE COUNTY OF PIMA

In re the Marriage of:)	
)	No. D-112333
TAMMY LYNN FLORES)	
Petitioner)	
vs.)	OPPOSITION TO MOTION
)	TO CONTINUE TRIAL DATE
ROBERT STEWART FLORES)	[Assigned to Judge Nichols]
Respondent)	

PETITIONER, TAMMY LYNN FLORES, through counsel undersigned
 objects to a continuance of the trial date and date for settlement conference
 on the following grounds:

1. This is the second continuance requested in this matter. The case originally was filed in August 1996.
2. The resetting of the Conciliation Court interviews were through no fault of Petitioner.
3. Certain of Petitioner's witnesses reside in the State of Texas and have previously made arrangements to schedule their vacation times with their employers. They will not be able to reschedule vacations and may therefore be unable to appear on behalf of Petitioner. In particular, Petitioner's parents who are as well acquainted with the facts as anyone except the parties, may well be unable to attend the continued trial.

M-R

4. Petitioner has no objection to stipulating that the pre-trial statement may be filed on the morning of the scheduled settlement conference in order to accommodate Respondent's counsel.

5. Petitioner is thus forced to withdraw from the conciliation court evaluation process in order to ensure that she may obtain necessary testimony at trial which testimony will support her claim for sole custody of the minor children and without which Petitioner's ability to present favorable evidence will be jeopardized.

Attached is a letter to the conciliation court indicating Petitioner's withdrawal from the program. Thus there is no longer a necessity for a continuance.

Respectfully submitted this 8th day of July, 1997

DAROL WILSON

CAROL WILSON
Attorney for Petitioner

Copy faxed/mailed July 8th 1997

to:
LYNN SAUL, Esq.
100 N. Stone, Suite 602
Tucson AZ 86701

M-W

D112333

CAROL WILSON
Attorney at Law
3210 E. Ft. Lowell, Suite 104
Tucson AZ 85716
Tel: [520] 325-3408
Fax: [520-325-4021]

July 8, 1997

Grace M. Hawkins, ACSW, CISW
Conciliation Court
32 N. Stone Suite 1704
Tucson AZ 85701-1403

Re: Flores and Flores

Dear Grace,

As you know, I represent Tammy Flores. Ms. Saul, attorney for Robert Flores has requested a continuance of the trial date because the custody evaluation will not be completed before the August 5th trial date.

Therefore Tammy must withdraw from the conciliation evaluation process and does so by this letter. Her witnesses from Texas have arranged their vacations with their employers and cannot change them. Tammy feels she must have family members available to testify at trial.

Thank you for your cooperation in the matter. I believe the first continuance should have been for a longer period in order to accommodate the conciliation process.

Yours truly,

CAROL WILSON

Carol Wilson
cc: Ms. Flores
Lynn Saul, Esq.

EXHIBIT _____

W-A

FILED

July 11 19*97*
JAMES N. CORBETT, Clerk
[Signature] Deputy

CAROL WILSON
Attorney at Law
3210 E. Ft. Lowell, Suite 104
Tucson AZ 85716
Tel: [520] 325-3408
Fax: [520-325-4021]

Attorney for Petitioner

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN
AND FOR THE COUNTY OF PIMA

In re the Marriage of:)	
)	No. D-112333
TAMMY LYNN FLORES)	
Petitioner)	
vs.)	OPPOSITION TO MOTION
)	TO CONTINUE TRIAL DATE
ROBERT STEWART FLORES)	[Assigned to Judge Nichols]
Respondent)	

PETITIONER, TAMMY LYNN FLORES, through counsel undersigned objects to a continuance of the trial date and date for settlement conference on the following grounds:

1. This is the second continuance requested in this matter. The case originally was filed in August 1996.
2. The resetting of the Conciliation Court interviews were through no fault of Petitioner.
3. Certain of Petitioner's witnesses reside in the State of Texas and have previously made arrangements to schedule their vacation times with their employers. They will not be able to reschedule vacations and may therefore be unable to appear on behalf of Petitioner. In particular, Petitioner's parents who are as well acquainted with the facts as anyone except the parties, may well be unable to attend the continued trial.

M-R

4. Petitioner has no objection to stipulating that the pre-trial statement may be filed on the morning of the scheduled settlement conference in order to accommodate Respondent's counsel.

5. Petitioner is thus forced to withdraw from the conciliation court evaluation process in order to ensure that she may obtain necessary testimony at trial which testimony will support her claim for sole custody of the minor children and without which Petitioner's ability to present favorable evidence will be jeopardized.

Attached is a letter to the conciliation court indicating Petitioners withdrawal from the program. Thus there is no longer a necessity for a continuance.

Respectfully submitted this 8th day of July, 1997

CARDL WILSON

CAROL WILSON
Attorney for Petitioner

Copy faxed/mailed July 7th 1997

to:

LYNN SAUL, Esq.
100 N. Stone, Suite 602
Tucson AZ 86701

M-R

D112333

CAROL WILSON
Attorney at Law
3210 E. Ft. Lowell, Suite 104
Tucson AZ 85716
Tel: [520] 325-3408
Fax: [520-325-4021]

July 8, 1997

Grace M. Hawkins, ACSW, CISW
Conciliation Court
32 N. Stone Suite 1704
Tucson AZ 85701-1403

Re: Flores and Flores

Dear Grace,

As you know, I represent Tammy Flores. Ms. Saul, attorney for Robert Flores has requested a continuance of the trial date because the custody evaluation will not be completed before the August 5th trial date.

Therefore Tammy must withdraw from the conciliation evaluation process and does so by this letter. Her witnesses from Texas have arranged their vacations with their employers and cannot change them. Tammy feels she must have family members available to testify at trial.

Thank you for your cooperation in the matter. I believe the first continuance should have been for a longer period in order to accommodate the conciliation process.

Yours truly,

Carol Wilson
cc: Ms. Flores
Lynn Saul, Esq.

M-R

60

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE: HON. RICHARD NICHOLS

CASE NO. D-112333

COURT REPORTER: NONE

DATE: July 14, 1997

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES
Petitioner

Petitioner's Attorney

and

Respondent's Attorney

ROBERT STEWART FLORES
Respondent

MINUTE ENTRY

IN CHAMBERS:

After discussing the matter with Fred Mitchell, Director of Conciliation Court,

IT IS ORDERED that the portion of the Court's minute entry of July 9, 1997 ordering disclosure of Conciliation Court material to counsel is deleted.

cc: Hon. Richard Nichols
Domestic Calendaring
Conciliation Court
Carol Wilson, Esq.
Lynn Elaine Saul, Esq.

M-N

JUL 14 1997

Pat Dini
Deputy Clerk

CAROL WILSON
Attorney at Law
3210 E. Ft. Lowell, Suite 104
Tucson AZ 85716
Tel: [520] 325-3408
St. Bar. No. 002874
PCN: 62820
Attorney for Petitioner

FILED
JAMES N. CORBETT
CLERK SUPERIOR COURT

97 AUG - 1 PM 6: 02

V. ARMY
DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA, IN
AND FOR THE COUNTY OF PIMA

In re the Marriage of:)
)
TAMMY LYNN FLORES) NO. D-112333
) PRETRIAL STATEMENT
Petitioner)
and) [Assigned to the Hon. Richard Nichols]
)
ROBERT STEWART FLORES)
Respondent)

The Parties through counsel undersigned respectfully submit their pretrial statement.

I. The nature of the action is:

Dissolution Modification of Support/Maintenance
 Legal Separation Modification of Custody
 Annulment Other (describe)

Estimated time for trial: One and one-half days.

II. (A) Parties:

Wife's Name: Tammy Lynn Flores
357 D S. Carmichael
Sierra Vista, AZ 85635

Husband's Name Robert Stewart Flores
7014 E. Golf Links Rd. #202
Tucson AZ 85730



M-O

(B) Names and birthdates of Minor children:

CASEY ALEXANDER FLORES
02/25/87

DAKOTA RYAN FLORES
06/12/92

C) Date and place of marriage:

Sierra Vista Arizona, May 19, 1986

III. Exhibits:

The parties stipulate that the exhibits attached hereto and incorporated herein by reference which are listed on Appendix A for Petitioner and on Appendix B for Respondent are all exhibits intended to be used by either party and on the attached exhibits are statements as to whether or not there is any objection to each exhibit and what the grounds are for such objection or whether such exhibits may be submitted without further foundation. (Refer to Rule 8.5 Rules of Domestic Relations Cases/ Pima County Local Rules, for mandatory exhibits).

IV: Witnesses

(A) For Petitioner:

1. Petitioner and Respondent

2. Charlotte Key, 8869 Grape Creek Rd.; San Angelo TX 76901

3. James Manshardt, M.D.; 1200 N. El Dorado Place, Bldg. H, Suite 800,
Tucson AZ 85715; Tel: 296-4280

4. Casey (Casey Alexander) Flores; same address as Petitioner

5. Laurie Click Moore, address to be supplied

6. Daryl Yarborough, 1618 S. Country Club, Tucson AZ 85713

7. Linda Harker, Benefits representative, Carondolet Health Care, 350 N.
Wilmot, Tucson AZ 85711-2678; Tel: 296-3211, Ext. 2449 or 721-3899.

8. Paul Key, same address as Charlotte Key

M-O

V. Stipulations and Admissions

The marriage is irretrievably broken and there is no reasonable prospect of reconciliation.

VI. Uncontested issues of fact deemed material.

None

VII. Contested issues of fact deemed material:

A. Petitioner's position, and proposal for disposition:

1. Custody of Casey and Cody
2. Child support amount
3. Medical insurance for children
4. Division of marital property
5. Allocation of marital debts
6. Attorneys fees to be awarded to Petitioner

CUSTODY: Petitioner desires sole custody or joint legal custody of Casey and Cody with primary physical custody awarded to Petitioner. This is so because Petitioner has been the primary parent of the children since their births and is better able to provide a stable and loving environment for them in light of Respondent's living arrangements.

Visitation should be awarded to Respondent in accordance with the Pima County Guidelines and at any reasonable time on reasonable notice to Petitioner.

Petitioner intends to move from Arizona to Texas to be near her family who provide loving support and financial assistance and where Petitioner will be better able to secure employment. Petitioner is willing to make all reasonable arrangements for Respondent to maintain a close relationship with the children.

CHILD SUPPORT: Respondent is now paying support and should be ordered to pay continued support in accordance with the guidelines.

M-O

DIVISION OF PROPERTY AND DEBTS: please see pretrial inventory attached hereto.

ATTORNEYS FEES: Petitioner has been obliged to borrow money from her family to pay her fees and costs and request the court award her fees and costs to be paid by Respondent.

B. Respondent's position and detailed proposal for disposition:

(See attached)

VIII. Issues of Law:
PETITIONER'S POSITION:

Custody: Ariz. Rev. Stat. Ann. S. 25-403. In accordance with the statute, Petitioner is the parent who has been the primary care giver and nurturer of the children and is better able to provide a stable and loving environment for them. Respondent has had little involvement in raising the children. The Court should order sole custody to Petitioner, or joint custody with primary physical custody in Petitioner.

RESPONDENT'S POSITION: see attached
Child Support; Ariz. Rev. Stat. Ann. S. 25-320

Dissolution of Marriage: Ariz. Rev. Stat. Ann. S. 25-312; 25-316

Attorneys Fees: Ariz. Rev. Stat. Ann. 25-324

Property Issues and Debts: Ariz. Rev. Stat. Ann. S. 25-215

IX Discovery

All pre-trial disclosures and discovery under Rules 26-37, Ariz. R.Civ.P have been completed.

X Copies: Each party has received a copy of this pretrial statement.

XI Counsel have in good faith discussed settlement:

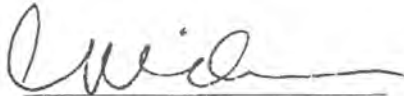
Yes

No, If not, why not:

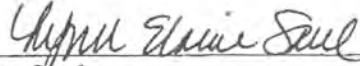
COUNSEL AGREE THAT THIS STATEMENT MAY BE AMENDED AND SUPPLEMENTED AND EXHIBITS MAY BE EXCHANGED THROUGH THE TIME OF THE DOMESTIC SETTLEMENT CONFERENCE. COUNSEL WAIVE PETITIONER'S SIGNATURE ON INVENTORY OF PROPERTY AND FILING PETITIONER'S FINANCIAL AFFIDAVIT UNTIL THE SETTLEMENT CONFERENCE.

M-O

Respectfully submitted this 31 day of July, 1997



Carol Wilson
Attorney for Petitioner
3210 E. Ft. Lowell, Suite 104
Tucson AZ 85716



Lynn Saul
Attorney for Respondent
100 N. Stone, Suite 602
Tucson AZ 85701

M-O

IV. WITNESSES

(B) FOR RESPONDENT

1. Respondent
2. Jessica Mathis

NOTE: RESPONDENT OBJECTS TO PETITIONER LISTING MINOR CHILD OF PARTIES, CASEY, AS WITNESS, AND WILL OBJECT TO MINOR CHILDREN TESTIFYING OR OTHERWISE BEING INVOLVED IN THESE PROCEEDINGS

M-O

VII. CONTESTED ISSUES OF FACT DEEMED MATERIAL:

B. RESPONDENT'S POSITION, AND PROPOSAL FOR DISPOSITION:

1. Custody of minor children, CASEY and DAKOTA

Respondent believes that he should have sole custody with reasonable visitation to Petitioner, or in the alternative, the parties could have joint custody, with approximately equal time with each parent. The mother should not be allowed to relocate to Texas with the minor children.

Although during the marriage Petitioner was the primary caretaker for the minor children, this was because the parties agreed that Respondent would work and also attend college to improve the parties' financial ability to care for the children. However, Petitioner interfered with Respondent's ability to complete his education by forcing the family to move from Texas to Arizona.

Since the separation of the parties, Respondent has been heavily involved in the care of the children and has attempted to be even more involved, but Petitioner moved the children from Tucson to Sierra Vista at least in part to preclude more involvement by Respondent. When she became re-employed in Tucson, the parties attempted to negotiate an equal time-sharing arrangement in order to provide better child care for the children directly by the parents, but then Petitioner said that she could relocate her residence and the time sharing arrangements could not be changed. Respondent is willing and able to assume at least equal time with the children. The children flourish in his care.

Respondent also believes that Petitioner has had ongoing mental health problems which do not always interfere with her care of the children but do, from time to time, affect her judgment and ability to care for them. Respondent believes that he can best support the children to avoid these difficulties if he is in close geographic proximity to the children and sees them on a frequent and continuing basis, so that he can monitor how they are doing. If the Petitioner takes the children to Texas, his time with the children will by necessity be less frequent, reducing his ability to serve as a "safety net" in the event Petitioner has problems.

Respondent is also concerned because Petitioner has obstructed his visitation and interfered with his access to the children.

Respondent also believes that Petitioner is denigrating the value of education and work, particularly for the parties' daughter, Casey, but rather is raising her to believe that she does not need an education because she can find a man to marry her and take care of her. Respondent, on the

M-O

other hand, believes he is better able to encourage and support both children's education and help them to grow into responsible, productive adults.

CHILD SUPPORT: In accordance with the guidelines. Based on Petitioner's ability to work full time, this would result in Respondent paying support of \$287/month.

Both parties should maintain any life insurance available to him or her at work for the benefit of the minor children of the parties.

SPOUSAL MAINTENANCE: Not an issue. Neither party is entitled to spousal maintenance.

DIVISION OF PROPERTY AND OBLIGATIONS: See inventory.

ATTORNEY'S FEES: Each party should pay his or her own attorney's fees and court costs. Petitioner is employed and able to pay her fees and costs. Respondent does not have funds available to pay any of Petitioner's fees and costs. Furthermore, Petitioner's actions in terminating the custody evaluation process prematurely have increased the total attorney's fees involved in this proceeding.

M-O

APPENDIX B

III. EXHIBITS FOR RESPONDENT

Spousal affidavit of Petitioner
Spousal affidavit of Respondent
Payroll history records of both parties
Recent pay stubs of both parties
Statements from creditors
Bank and credit union statements
Tax returns of both parties
Letter to Howard College from William J. Hudak, Aug. 9, 1994
Appraisals on guns
Tape of phone conversations, November 1996, when Petitioner had gone to Texas, between Respondent and children's aunt, Linda Click, between Respondent and Petitioner, and between Petitioner and children, with unidentified man in background

FLORES and FLORES D-112333

PETITIONER'S EXHIBIT LIST

1. Spousal affidavit of Petitionr
2. Petitioner's payroll history
3. Petitioner's recent pay stubs.
4. Respondent's payroll history
5. Letter and statement re health insurance costs for children
6. Check from Petitioner to Respondent re gaming winnings
7. Report card of Casey
8. Curriculum vitae of Dr. Manshardt.
9. Statements from creditors
10. Bank and credit union statements.

M-O

FLORES and FLORES D-112333 PRE-TRIAL STATEMENT INVENTORY OF
PROPERTY AND DEBTS

Petitioner's Inventory and request for disposition:

AUTOMOBILES:

- | | |
|------------------|---------|
| 1. Toyota Tercel | Husband |
| 2. (1988 Olds) | Wife |

GUN COLLECTION

To be sold or divided in kind, one half to each.

PERSONAL PROPERTY

1. Clothes, furnishings and personal effects in her possession to
Wife, including clothes and toys of children.

2. Clothes, furnishings and personal effects in his possession to
Husband.

3. Vacuum cleaner to Wife.

4. Husbands retirement benefits to be allocated.

5. Life insurance on life of Husband to be maintained naming
children as beneficiaries.

DEBTS: There are substantial community debts as shown on Exhibit One,
Petitioner' financial affidavit which should be equitably allocated.

Dated this day of July, 1997

TAMMY LYNN FLORES

M-O

Flores v. Flores	DESCRIPTION	FMV	ENCUMBRANCE	TO HUSB	TO WIFE
REAL PROPERTY	None				
VEHICLES	Wife: donated Chevrolet that was comm prp to her church				
	Wife drives car that was gift from her grandparents				
	Husband: VW was totalled in accident; claim pending				
	Husband: Jeep was gift from father				
BUSINESS INTERESTS	None				
STOCKS AND BONDS	None				
ACCTS RECEIVABLE	None				
CASH/DEP ACCTS	Saguaro Credit Union	70		70	
	First Community F. C. U.	50		50	
	Wife's accounts (details unknown)	120			120
LIFE INSURANCE	No cash value policies				
PENSION/IRA/ETC					

M-O

DESCRIPTION	FMV	ENCUMBRANCE	TO HUSB	TO WIFE
Flores v. Flores				
None				
DEBTS AND OBLIGATIONS				
Payco-General American Credits		243		243
Chase VISA 4226-801-119-949		1001		1001
Macy's		421		421
Credit First Autopass		356		356
Sierra Vista Comm. Hosp. (Dakota)		146		146
ASAP Student Loans		2400	2400	
MEDT-Comm		906	906	
Seats		160	160	
Chase MasterCard		425	425	
Enterprise Car Rental		280	280	
OTHER PROPERTY				
Vacuum cleaner	220			220
Household furn and personal effects, Tammy				x
Household furn and personal effects, Bob			x	
Gun collection	775		775	
TOTAL		9601	-3396	-1947

I HEREBY CERTIFY THAT THE FOREGOING INVENTORY IS A COMPLETE LIST OF THE ASSETS AND DEBTS OF THE PARTIES AND I HEREBY SUBMIT THIS INVENTORY OF ASSETS AND DEBTS TO THE COURT WITH THE KNOWLEDGE THAT IT WILL BE USED BY THE COURT IN RESOLVING THE ISSUES INVOLVED IN THIS DISSOLUTION OF MARRIAGE PROCEEDINGS.

DATED: July 30, 1997


(HUSBAND)

ATTORNEY'S NAME, ADDRESS, PHONE
 LYNN ELAINE SAUL
 100 N. Stone Suite 602
 Tucson AZ 85701
 (520) 882-6226
 PCC No. 40164

M-O

ARIZONA SUPERIOR COURT, PIMA COUNTY

TAMMY LYNN FLORES and ROBERT STEWART FLORES Respondent.	NO. <u>D-112333</u> SPOUSE'S FINANCIAL AFFIDAVIT <input type="checkbox"/> As of date of order sought to be modified <input checked="" type="checkbox"/> Current	
--	--	--

NAME: Robert Stewart Flores BIRTHDATE: 2/24/61
 ADDRESS: 7014 E. Golf Links Rd. #202 SSN: [REDACTED]
Tucson AZ 85730-1064

		Creditor	Balance	Payment
NECESSARY MONTHLY EXPENSES				
For yourself and minor child(ren) residing with you.				
Housing (rent/mtg):	\$ 250	Student Loan-ASAP	\$ 2400	\$ 50
Repair/Upkeep:		Sears Credit Card	\$ 160	\$ 20
Utilities:		Chase Mastercard	\$ 425	\$ 20
Electricity	included	Enterprise Rent a Car	\$ 280	\$ 20
Gas		Lynn Saul-Attorney fees	\$ 1110	\$ 200
Water		(will increase)		
Phone	33	TOTAL MONTHLY PAYMENTS.....		\$ 310
Garbage		TOTAL MONTHLY EXPENSES/PAYMENTS....		\$ 1342
Food & Household Supplies:	200	GROSS PAYCHECK (YTD AVERAGE).....		\$ 741.83
Work/School Lunch:	50	[check one]		
Medical, dental, drugs, supplies:	20	[weekly x 4.3]twice mo. x 2		
Insurance not deducted from pay:		[monthly]every 2 wks x 2.16		
Clothing:	100	GROSS MONTHLY INCOME.....		\$ 1602.35
Laundry/Dry Cleaning:		GROSS PAYCHECK (current).....		\$ 741.83
Child Care/Sitter:		Less:		
Support paid for spouse and/or minor children of prior marriage:		Federal Taxes	\$ 38.47	
Car Repair/Maint.	50	State Taxes	10.77	
Car Insurance	56	FICA	54.19	
Gas/Oil	77	Credit Union		
License	15	Insurance	33.99	
Bus/Taxi Fares		Union Dues		
Other: Misc.	50	Savings, etc.		
Gym contract	39	Other:		
Entertainment, inc with children	60	Total deductions.....		\$ 137.42
Furniture storage	32	Net Paycheck.....		\$ 604.41
TOTAL MONTHLY EXPENSES.....	\$ 1032	OTHER MONTHLY INCOME		
		Pension/Retirement		\$ _____
		Social Security/SSI		_____
		Dividends/Interest		_____
		GA/AFDC		_____
		Rec'd. for minor child(ren) not of this marriage under your care		_____
		Other:		_____
		TOTAL OTHER INCOME.....		\$ _____

M-O

D112333

Present occupation: LPN Starting date: 2/26/96
Name, address, phone number of present employer: Carondelet

Prior occupation: LPN Starting date: 8/26/95
Monthly pay: _____ Ending date: 2/20/96
Name, address, phone number of prior employer: Flower Square

If not employed, why? _____
Do you expect to work? _____ If so, when? _____ Anticipated occupation: _____
Name(s) and age(s) of minor child(ren) residing with you: _____

Are you or your spouse pregnant? yes no If yes, estimated delivery date: _____
Physical defect or organic disease suffered by you or your minor children: _____

List all bank accounts, including checking, savings, credit union, certificates of deposit, in your name, in name of both spouses, or in which you have an interest:

Bank/Branch	Type of Account	Account Number	Amount
Saguaro Credit Union	Checking/Savings	52012	70.00
1st Commercial F.C.U.	Savings	96765003	50.00

List all cash under your control and stocks, shares and/or bonds in yours or your spouse's name or in which you or your spouse have an interest. _____

Attorney fees paid to date: \$ 1290.00 Court costs paid to date: \$ 106.50

List all debts not included in monthly payments schedule on page 1:

Creditor	Balance	Payment	Creditor	Balance	Payment

STATE OF ARIZONA)
County of Pima) SS:

R. Flower
Petitioner/Respondent

SUBSCRIBED AND SWORN/AFFIRMED TO, before me this 31 day of July, 1997

My commission expires: 10/10/97
Lynn Elaine Saul
Notary Public

Name and address of Affiant's Attorney:
LAW OFFICE OF
LYNN ELAINE SAUL
100 N. STONE, SUITE 602
TUCSON, AZ 85701
(520) 882-8228

M-O

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE PROTEM: HON. WILLIAM G. LANE

COURT REPORTER: NONE

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES
Petitioner

and

ROBERT STEWART FLORES
Respondent

CASE NO. D-112333

DATE: August 4, 1997

Carol Wilson
Petitioner's Attorney

Lynn Elaine Saul
Respondent's Attorney

REC'D
AUG 5

MINUTE ENTRY

SETTLEMENT CONFERENCE:

Both parties are present.

Tammy Lynn Flores is sworn and examined.

The parties have reached an agreement as follows:

1. Each party is going to keep that personal property which he or she currently has in his or her possession.
2. The division of debts will be set forth in the Property Settlement Agreement that will be in accordance with the respondent's inventory.
3. The parties will have joint custody of the minor children, with primary physical to be with the petitioner. Visitation will be set forth in the Joint Parenting Plan, which the parties will produce. The respondent will have the children with him for basically the entire summer, starting two weeks after school is out and ending five days before school commences. During that period of time, the petitioner may see the children on at least 72-hours notice to the respondent, if she is in Tucson and there is a reciprocal phone-call arrangement. The respondent will also have the children for Christmas visitation each year, except that in alternating years, starting with Christmas 1998, the petitioner will have them on

Cathy Pearson
Deputy Clerk

M-F

MINUTE ENTRY

Page: 2

Date: August 4, 1997

Case No: **D-112333**

Christmas day. So that in alternating years, the petitioner has the children for Christmas day, but the respondent always has the children during the Christmas school holiday. The respondent will have visitation with the children during Spring Break each year. The petitioner shall provide the transportation to Tucson, Arizona, from San Angelo, Texas. The respondent is entitled to additional visits with the children on reasonable notice at his own expense.

4. The respondent shall have the tax exemption for both children in 1997, and thereafter the petitioner will have the tax exemption for Casey and the respondent will have the tax exemption for Dakota.

THE COURT FINDS the marriage irretrievably broken, with no reasonable prospect of reconciliation.

THE COURT FURTHER FINDS that the conciliation statutes have been met or do not apply.

THE COURT FURTHER FINDS that the jurisdictional requirements have been met.

IT IS ORDERED that the marriage is DISSOLVED.

IT IS FURTHER ORDERED that the trial date is VACATED.

Ms. Saul is directed to prepare a form of Decree, Child Support Order, and Wage Assignment for the Court's signature, after obtaining approval as to form from the petitioner's counsel. The Child Support Order should include a provision for health insurance for the children. Said documents shall be filed within 30 days of this date. If no documents are received, this case will be dismissed.

IT IS FURTHER ORDERED that both parties shall bear their own attorney's fees and costs.

cc: William G. Lane, Esq. (Judge Pro Tempore)
Domestic Calendaring
Carol Wilson, Esq.
Lynn Elaine Saul, Esq.
Clerk of Court - Child Support Unit
Hon. Richard Nichols

Cathy Pearson
Deputy Clerk

M-R

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE: HON. RICHARD NICHOLS

CASE NO. **D-112333**

COURT REPORTER: NONE

DATE: August 5, 1997

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES
Petitioner

Petitioner's Attorney

and

ROBERT STEWART FLORES
Respondent

Respondent's Attorney

MINUTE ENTRY

TRIAL:

The case having settled,

IT IS ORDERED vacating the trial set this date.

cc: Hon. Richard Nichols
Domestic Calendaring
Carol Wilson, Esq.
Lynn Elaine Saul, Esq.

M-R

AUG 5 1997

Pat Dini
Deputy Clerk

FILED

97 AUG 11 PM 1:01

JAMES N. CORBETT
CLERK OF SUPERIOR COURT
BY Shaw
DEPUTY

SUPERIOR COURT OF ARIZONA, COUNTY OF (1) PIMA

Case No. (4) D-112333

(2) TAMMY LYNN FLORES
Petitioner,

02/04/64
DOB SSN

vs.

(3) ROBERT STEWART FLORES
Respondent,

02/24/81
DOB SSN

CHILD SUPPORT ORDER

THE COURT FINDS THAT:

1. The parties owe a duty to support the following children:

(5) Name	Date of Birth	Social Security Number
CASEY ALEXANDER FLORES	02/ 25/ 87	- -
DAKOTA RYAN FLORES	06/ 12/ 92	- -
	/ /	- -
	/ /	- -
	/ /	- -
	/ /	- -

2. The parties' circumstances are as follows:

	FATHER	MOTHER	COMBINED
Gross Income	\$1,606.00 (8)	\$912.00	
Spousal Maintenance Paid	\$0.00 (9)	\$0.00	
Child Support Paid	\$0.00 (10)	\$0.00	
Adjustment for Supporting Other Children	\$0.00 (11)	\$0.00	
Adjusted Gross Income	\$1,606.00 (12)	\$912.00	(13) \$2,518.00
Basic Child Support Obligation			(15) \$671.00
Medical Insurance Premium			(16) \$150.00
Child Care			(17) \$0.00
Extra Education			(18) \$0.00
Child(ren) 12 or Older			(19) \$0.00
Extraordinary Child			(20) \$0.00
Total Child Support Obligation			(22) \$821.00
Proportionate Share of Income	63.78% (25)	36.22%	
Each Parent's Support Obligation	\$523.64 (28)	\$297.36	
Adjustment for Costs Associated with Visit.	\$125.48 (29)	\$0.00	
Medical Insurance Premium Adjustment	\$0.00 (30)	\$0.00	

R M-O

Day care Adjustment Non-Custodial Parent	\$0.00 (31)	\$0.00
Court Approved Discretionary Visitation Adjustment	\$0.00 (32)	\$0.00
Preliminary Child Support Amount	\$398.16 (34)	\$297.38

Self Support Reserve Test

Paying parent's ADJUSTED gross income (Line 12) minus -\$645.00 = the resulting amount.	\$981.00	(35)	\$267.00
--	----------	------	----------

3. Obligor's employer/payor is:

Name: St. Joseph's Hospital (Caronde
Payroll Dept. Address: 350 N. Wilmot Road
Tucson AZ 85711

4. Written Findings for Physical Custody Adjustment, Court Approved Discretionary Visitation Adjustment and/or Other Adjustments:

5. The court finds that the payor has the ability to pay child support:

In the amount entered on line 34 \$ 398
 In an adjusted amount calculated using the self support reserve \$
on line 35.

6. The court, having considered the best interests of the child(ren), deviates from the guidelines for the following reasons:

Application of the guidelines is inappropriate.
 Application of the guidelines is unjust.
 The parties have signed a written agreement with knowledge of the amount of support that would have been ordered by the guidelines but for the agreement.

The court makes the following finding regarding the deviation

The child support order would have been \$
 The child support order after deviation is \$
 All parties have signed the agreement free of duress and coercion.

R M-O

D112333

IT IS ORDERED THAT:

A. The effective date of the obligation to pay child support ordered by the court is 08/15/97

The first payment is due 08/15/97. Payments shall be made through the Clerk of the Court/Clearinghouse pursuant to an Order of Assignment signed this date.

The Petitioner Respondent shall pay child support of 400 per month. If this is a modification of child support, all other prior orders of this court not modified herein remain in full force and effect.

At any time the obligor's employer/payor is not paying pursuant to an Order of Assignment, the obligor must make full and timely payment directly to the Clerk of the Court/Clearinghouse.

Payments not made through the Clerk of the Court/Clearinghouse shall be considered gifts unless otherwise ordered. Payments must include the case number and the obligor's name.

B. Unless the court has ordered otherwise, the parties affected by this order shall notify the Clerk of the Court/Clearinghouse of their addresses and shall notify the Clerk/Clearinghouse of any change of address within ten (10) days. The obligor shall also notify the Clerk/Clearinghouse of the names and addresses of the obligor's employers or other payors and, within 10 days, of any changes thereof.

C. Petitioner Respondent is responsible for providing medical insurance for the children.

Petitioner Respondent shall pay 35% of any uninsured medical expenses and the other party shall pay the remainder.

D. The costs of visitation-related travel/transportation shall be shared by the parents as follows:

Father: % Mother: 100%

E. The parties shall:

Exchange financial information such as copies of tax returns, earnings statements, and a Parent's Worksheet every 24 months.

Exchange residential addresses and the names and addresses of their employers every 24 months.

Other:

F. The court allocates the tax exemption(s) as follows:

Father shall claim both children in odd numbered tax years.
Each party shall claim one child in even numbered tax years.

8/11/97
Date


Judge or Commissioner M-O

8-11-97

FILED

97 AUG 11 PM 11 00

JAMES H. CORBETT
CLERK OF SUPERIOR COURT

BY [Signature]
DEPUTY

(1) Person Filing: LYNN ELAINE SAUL
Address: 100 N. STONE, SUITE 802
TUCSON AZ 85701

Phone: (520) 882-6226

Representing:

State Bar Number: 3343; PCC # 40164

Atlas Number:

SUPERIOR COURT OF ARIZONA, COUNTY OF (2) PIMA

(3) TAMMY LYNN FLORES
Petitioner,

Case No. (5) D-112333

vs.

ORDER OF ASSIGNMENT

(4) ROBERT STEWART FLORES
Respondent,

(6)

- Without Notice
- After Hearing
- Automatic

TO: Current and future employers or other payors of:
(7) Name: ROBERT STEWART FLORE

Social Security Number: 559 - 39 - 0099

You shall withhold court-ordered payments as follows:

Current Child Support	\$400.00
Spousal Maintenance	\$0.00
(8) Payments on Arrears	\$0.00
Other Amounts	\$0.00

for the total amount per month of \$400.00, but no more than 50% of the disposable earnings to be made payable to the Clerk of the Superior Court, plus an additional annual handling fee amount (set by statute) to be paid to the Clerk of the Superior Court.

THIS ORDER MODIFIES ANY PREVIOUSLY ORDERED ASSIGNMENT WITH THE SAME CASE NUMBER AS IN NUMBER (5) ABOVE.

R M-O

Case Number D-112333

(10) This Order of Assignment is binding or

31* days
after service of this Order on you, and
 14 days

continues until further Order of the Court, or until the Obligor has not been employed by you for a period of 90 continuous days. If you are again obligated to pay monies to the Obligor within 90 days, you are again bound by this Order of Assignment.

If this is an Order 'Without Hearing,' you are ordered to deliver or mail by registered or certified mail a copy of: (1) the Request, (2) the Order of Assignment, and (3) the Notice to the person ordered to pay child support or spousal support (maintenance) within ten days of the date you were served.

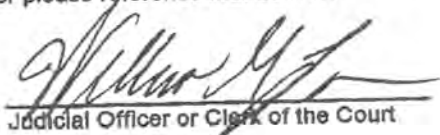
You are further ordered that, as a result of this assignment, you are not to discharge or otherwise discipline the person named.

All Payments shall be sent to:

Clerk of Superior Court
110 W. Congress
Tucson, AZ 85701

Please reference the Court Case number in number (5) above as well as the employee's name on all payments sent. If the case also has an ATLAS number please reference that as well.

Dated: (11) 8/11/97


Judicial Officer or Clerk of the Court

*If you receive a Notice to Subsequent Employer/Payor Subject to an Order of Assignment 'Without Notice', you are a subsequent employer and this Order is binding 14 days after service of this Order.

Page 2 of 2

R
BOOK 5404 PAGE 604

M-O

8-11-97
FILED

97 AUG 11 11 AM 11 00
JAMES N. CORBETT
CLERK OF SUPERIOR COURT
BY [Signature]
DEPUTY

SUPERIOR COURT OF ARIZONA, COUNTY OF (1) PIMA

(2) TAMMY LYNN FLORES)
Petitioner,)
02/04/84)
DOB) SSN)
vs.)
(3) ROBERT STEWART FLORES)
Respondent,)
02/24/81)
DOB) SSN)

Case No. (4) D-112333

CHILD SUPPORT ORDER

THE COURT FINDS THAT:

1. The parties owe a duty to support the following children:

(5)

Name	Date of Birth	Social Security Number
CASEY ALEXANDER FLORES	02/ 25/ 87	- -
DAKOTA RYAN FLORES	06/ 12/ 92	- -
	/ /	- -
	/ /	- -
	/ /	- -
	/ /	- -

2. The parties' circumstances are as follows:

	FATHER	MOTHER	COMBINED
Gross Income	\$1,606.00 (8)	\$912.00	
Spousal Maintenance Paid	\$0.00 (9)	\$0.00	
Child Support Paid	\$0.00 (10)	\$0.00	
Adjustment for Supporting Other Children	\$0.00 (11)	\$0.00	
Adjusted Gross Income	\$1,606.00 (12)	\$912.00	(13) \$2,518.00
Basic Child Support Obligation			(15) \$671.00
Medical Insurance Premium			(16) \$150.00
Child Care			(17) \$0.00
Extra Education			(18) \$0.00
Child(ren) 12 or Older			(19) \$0.00
Extraordinary Child			(20) \$0.00
Total Child Support Obligation			(22) \$821.00
Proportionate Share of Income	63.78% (25)	36.22%	
Each Parent's Support Obligation	\$523.64 (28)	\$297.36	
Adjustment for Costs Associated with Visit.	\$125.48 (29)	\$0.00	
Medical Insurance Premium Adjustment	\$0.00 (30)	\$0.00	

R M-O

Day care Adjustment Non-Custodial Parent	\$0.00 (31)	\$0.00
Court Approved Discretionary Visitation Adjustment	\$0.00 (32)	\$0.00
Preliminary Child Support Amount	\$398.16 (34)	\$297.36

Self Support Reserve Test

Paying parent's ADJUSTED gross income (Line 12) minus -\$845.00 = the resulting amount.	\$961.00	(35)	\$287.00
--	----------	------	----------

3. Obligor's employer/payor is:

Name: St. Joseph's Hospital (Caronde)
Payroll Dept. Address: 350 N. Wilmot Road
Tucson AZ 85711

4. Written Findings for Physical Custody Adjustment, Court Approved Discretionary Visitation Adjustment and/or Other Adjustments:

5. The court finds that the payor has the ability to pay child support:

In the amount entered on line 34 \$ 398
 In an adjusted amount calculated using the self support reserve \$
on line 35.

6. The court, having considered the best interests of the child(ren), deviates from the guidelines for the following reasons:

Application of the guidelines is inappropriate.
 Application of the guidelines is unjust.
 The parties have signed a written agreement with knowledge of the amount of support that would have been ordered by the guidelines but for the agreement.

The court makes the following finding regarding the deviation

The child support order would have been \$
 The child support order after deviation is \$
 All parties have signed the agreement free of duress and coercion.

R M-O

D112333

IT IS ORDERED THAT:

A. The effective date of the obligation to pay child support ordered by the court is 08/15/97

The first payment is due 08/15/97. Payments shall be made through the Clerk of the Court/Clearinghouse pursuant to an Order of Assignment signed this date.

The Petitioner Respondent shall pay child support of 400 per month. If this is a modification of child support, all other prior orders of this court not modified herein remain in full force and effect.

At any time the obligor's employer/payor is not paying pursuant to an Order of Assignment, the obligor must make full and timely payment directly to the Clerk of the Court/Clearinghouse.

Payments not made through the Clerk of the Court/Clearinghouse shall be considered gifts unless otherwise ordered. Payments must include the case number and the obligor's name.

B. Unless the court has ordered otherwise, the parties affected by this order shall notify the Clerk of the Court/Clearinghouse of their addresses and shall notify the Clerk/Clearinghouse of any change of address within ten (10) days. The obligor shall also notify the Clerk/Clearinghouse of the names and addresses of the obligor's employers or other payors and, within 10 days, of any changes thereof.

C. Petitioner Respondent is responsible for providing medical insurance for the children.

Petitioner Respondent shall pay 35% of any uninsured medical expenses and the other party shall pay the remainder.

D. The costs of visitation-related travel/transportation shall be shared by the parents as follows:
Father: % Mother: 100%

E. The parties shall:

Exchange financial information such as copies of tax returns, earnings statements, and a Parent's Worksheet every 24 months.

Exchange residential addresses and the names and addresses of their employers every 24 months.

Other:

F. The court allocates the tax exemption(s) as follows:

Father shall claim both children in odd numbered tax years.
Each party shall claim one child in even numbered tax years.

8-11-97
Date

Judge or Commissioner M-O

R

FILED

97 AUG 11 PM 12: 58

JAMES N. CORBETT
CLERK OF SUPERIOR COURT
BY *[Signature]*
DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL
3 100 N. Stone Avenue, Suite 602
4 Tucson AZ 85701
5 (520) 882-6226
6 Fax (520) 882-7678
7 State Bar # 3343
8 Pima County Comp. # 40164
9 Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

8 In re the Marriage of
9 TAMMY LYNN FLORES,
10 Petitioner,
11 and
12 ROBERT STEWART FLORES,
13 Respondent.

)
)
) No. D-112333
) (Assigned to Hon. Richard
) D. Nichols)
)
) DECREE OF DISSOLUTION OF
) MARRIAGE
)
) (WITH CHILDREN)
)
)
)
)
)
)
)

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17 THIS MATTER COMING ON REGULARLY FOR HEARING, Petitioner TAMMY LYNN
18 FLORES appearing in person and by her attorney, CAROL WILSON, and
19 Respondent ROBERT STEWART FLORES appearing by his attorney, LYNN
20 ELAINE SAUL, evidence having been presented and the Court being
21 fully advised,
22 THE COURT FINDS that the marriage of the parties is irretrievably
23 broken, with no reasonable prospect of reconciliation, that the
24 requirements of ARS Sec. 25-381.09 either do not apply or have been
25 met, that Petitioner has been a resident of Arizona for more than
26 ninety (90) days prior to the filing of the Petition in this
27 matter, that the provisions for custody and support of the minor
28 children of the parties are fair and reasonable, and that the

M-O

(R)

BOOK 5402 PAGE 230

1 provisions made herein for spousal maintenance and the division of
2 joint, common, and community property and obligations are fair and
3 reasonable.

4 IT IS THEREFORE ADJUDGED AND DECREED:

- 5 1. That the marriage of the parties is hereby dissolved.
- 6 2. That there shall be no spousal maintenance paid by either
7 party to the other.
- 8 3. That the parties shall have joint custody of the minor
9 children of the parties, CASEY ALEXANDER FLORES, born February
10 25, 1987; DAKOTA RYAN FLORES, born June 12, 1992, in
11 accordance with the Joint Custody Parenting Plan signed by the
12 parties and attached hereto and incorporated herein.
- 13 4. That ROBERT STEWART FLORES shall pay child support through the
14 Clerk of this Court in accordance with the Guidelines, in the
15 amount of \$400 per month, plus the Clerk's annual fee.
- 16 5. That Respondent ROBERT STEWART FLORES is hereby awarded the
17 following property:
18 Gun collection; household furnishings and effects in his
19 possession.
- 20 6. That Respondent ROBERT STEWART FLORES is hereby ordered to pay
21 the following community obligations and hold Petitioner
22 harmless therefrom:
23 Chase Manhattan MasterCard in his name; ASAP student loans;
24 MediComm, Sears gym contract; Enterprise car rental.
- 25 7. That Petitioner TAMMY LYNN FLORES is hereby awarded the
26 following property:
27 Vacuum cleaner, household furnishings and effects in her
28 possession.

BOOK 5402 PAGE 231

M-O
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1 8. That Petitioner TAMMY LYNN FLORES is hereby ordered to pay the
2 following community obligations and hold Respondent harmless
3 therefrom:

4 Chase Manhattan Visa in her name; Macy's; PayCo-General
5 American Credits (Chevron), Credit First Autopass
6 (Firestone), Sierra Vista Community Hospital.

7 9. That each party's sole and separate property is hereby
8 confirmed to him or her.

9 10. That wife's former name of TAMMY LYNN is restored to her as
10 her true and legal name.

11 11. That each party shall pay his or her own attorney's fees and
12 court costs of this action.

13
14 DONE IN OPEN COURT this 11 day of August, 1997.

15
16 William J. [Signature]
17 JUDGE PRO TEMPORE OF
18 PIMA COUNTY SUPERIOR COURT

19 Approved as to form:

20
21 [Signature]
22 CAROL WILSON
23 Attorney for Petitioner

24

M-O

(R)

BOOK 5402 PAGE 232

JOINT CUSTODY PARENTING PLAN BY AND BETWEEN TAMMY LYNN FLORES
(Mother) AND ROBERT STEWART FLORES (Father)

Pursuant to ARS Sec. 25-403, the parties agree:

- a. The parties acknowledge and agree that it is in the best interest of their children for them to have the joint care, custody, and control of the said minor children.
- b. The parties shall share joint legal custody. The parties agree to exchange and discuss information regarding major decisions concerning the minor child, and shall reach agreement on all major decisions regarding education, religion, and health care.
- c. The physical custody arrangements shall be as follows:
 - i. Primary physical custody shall be with the mother.
 - ii. The father shall be entitled to the following visitation, with all transportation costs to be paid by the mother, or in the alternative, the mother shall deliver the children to the father and pick them up from the following visitation periods:
 - (1) The children's summer school vacation beginning two weeks after school is out until five days before school starts.
 - (2) The children's Christmas vacation from school, but in alternate years beginning with Christmas 1998, the children shall spend Christmas Day with their mother and shall be with their father after that.
 - (3) The children's spring vacation from school.
 - iii. The father shall be entitled to additional visitation with the children upon reasonable notice to the mother and at his own expense.
 - iv. The father shall be entitled to telephone calls to the children two times per week, at specific mutually convenient times to be arranged from time to time by the parties. The mother shall not remain in the room where the children are speaking to their father on the phone. The mother shall provide the father with the phone number where the children can actually be reached. If there are unusual circumstances, such as out-of-town travel, which will prevent these telephone calls temporarily, the mother shall inform the father in advance of such interruptions in telephone access.
 - v. During any time that the children are with the father, the mother shall be entitled to reciprocal telephone access to the children. During the

BOOK 5402 PAGE 233

M-O

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children's summer visitation with the father, the mother shall be entitled to short visits with the children in the Tucson area on at least 72 hours notice to the father and subject to any previously scheduled activities that he has planned for the children.

- d. The parties understand that joint custody does not necessarily mean equal parenting time.
- e. Both parties shall endeavor to foster a feeling of genuine love and affection between the children and each of the parties, and neither will do anything which will or may tend to estrange the children from the other party. Neither party shall, either directly or indirectly, allow any other person to alienate the natural affections of their children toward the other party.
- f. Each party shall at all times keep the other informed of his or her place of residence and telephone number for so long as the children are below the age of eighteen (18) years.
- g. Should there be any conflicts or alleged breaches that arise with respect to any of the child custody aspects of this Agreement, the parties agree to seek the services of the Court of Conciliation or private mediators to first resolve these conflicts or issues prior to litigation.
- h. The parties shall review the terms of this Joint Custody Plan at least every two years to determine whether it still best meets the needs of the child and shall make any modifications which they mutually agree are in the best interest of the child. If the parties cannot agree, they shall seek the services of the Court of Conciliation or private mediators.
- i. Both parties are entitled to have equal access to medical, school and other records concerning the children directly from the custodian of the records, or from the other parent, and to participate equally in the child's school, religious, and extra-curricular activities, unless otherwise provided by Court order. Within 30 days of her move to Texas, and at any time in the future when the children change schools, the mother shall notify the father of the name and address of the school in which each child is enrolled as well as the names of the principal and counselor, and if known, the classroom teacher(s) for each child. The mother shall provide written notice to the children's schools that the father is to receive quarterly report cards and all other important notices regarding each child and is entitled to all other records and personal conferences that he may request. The mother shall furthermore periodically send a representative sample of the children's artwork, reports, and other school projects to the father.
- j. Each party shall be entitled to send mail and packages to the children when they are residing with the other parent. The parent shall deliver all mail and packages to the child without interference and shall assist the child in responding by

M-O

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D112333

acknowledging receipt of the mail or packages.

- k. Both parties are able to sustain an ongoing commitment to the minor children and this Joint Custody Agreement is logistically possible
- l. Both parties acknowledge that they are aware that a motion or petition to modify a child custody order shall meet the requirement of A.R.S. Sec. 25-403.
- m. The parties acknowledge that Arizona retains jurisdiction over all custody and visitation issues and that Arizona law controls the interpretation of this agreement.

Dated:


 TAMMY LYNN FLORES


 ROBERT STEWART FLORES

M-O



BOOK 5402 PAGE 235

Pima County Computer Number: 40164

FILED

97 AUG 11 PM 1:00

SUPERIOR COURT OF ARIZONA, COUNTY OF PIMA

TAMMY LYNN FLORES)
Petitioner,)
vs.)
ROBERT STEWART FLORES)
Respondent.)

Case No. D-112333

JAMES H. CORBETT
CLERK OF SUPERIOR COURT
BY Shawee

OBLIGEE/OBLIGOR
FACT SHEET

OBLIGOR

OBLIGEE

NAME: ROBERT STEWART FLORES
SSN: [REDACTED]
DATE OF BIRTH: 02/24/61
ADDRESS: 7014 E. Golf Links Rd.
#202
Tucson AZ 85730-1064

NAME: TAMMY LYNN FLORES
SSN: [REDACTED]
DATE OF BIRTH: 02/04/64
ADDRESS: 8869 Grape Creek Road
San Angelo TX 67901

EMPLOYER INFORMATION

AGENCY (If applicable)

FIRM NAME: St. Joseph's Hospital
ADDRESS: 350 N. Wilmot Road
Tucson AZ 85711

CHILDREN

NAME	DATE OF BIRTH	SOCIAL SECURITY #
CASEY ALEXANDER FLORES	02/25/87	- -
DAKOTA RYAN FLORES	06/12/92	- -
	/ /	- -
	/ /	- -
	/ /	- -
	/ /	- -

** IT IS THE RESPONSIBILITY OF THE OBLIGEE/OBLIGOR TO KEEP THE CHILD SUPPORT DIVISION NOTIFIED WHEN ANY CHANGES TO THE ABOVE OCCUR **

M-O

FILED

97 AUG 12 AM 11:31

JAMES H. CORBETT
CLERK OF SUPERIOR COURT
BY: *[Signature]*
DEPUTY

CAROL WILSON
Attorney at Law
3210 E. Ft. Lowell, Suite 104
Tucson AZ. 85716
Tel: [520] 325-3408
Fax: [520-325-4021]

Clerk of Superior Court
Child Support Division
110 West Congress
Tucson AZ. 85701

August 5, 1997

Re: Flores Dissolution D-112333

*D112333
T. Flores
- v -
R. Flores.*

Dear Sir/Madam,

I am the attorney for Tammy Lynn Flores, petitioner in the above cause. Please note the following:

Effective immediately, her address for mailing child support payments is:

Tammy Lynn (note change of name)
8869 Grapecreek Road
San Angelo TX 76901

Should you have any questions, please call.

Thank you

[Signature]
Carol Wilson

*Tammy Flores
vs
Robert Flores*

FILED

NOC

Office of the Clerk of the Superior Court
Pima County

Pima County Superior Courts Bldg.
110 West Congress St.
Tel: (520) 740-3200
Fax: (520) 798-3531
Tucson, Arizona 85701-1317

JAMES N. CORBETT
CLERK
SUPERIOR COURT

FILED
JAMES N. CORBETT
CLERK SUPERIOR COURT
97 AUG 14 AM 10:22

BY: E. BRADFORD,
DEPUTY

SHERRY KENNEDY
ASSOCIATE CLERK
SUPERIOR COURT

AUGUST 14, 1997

LYNN ELAINE SAUL, ESQ.

RE: No. D-112333

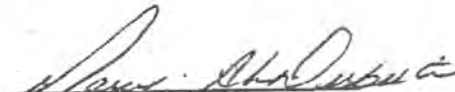
TAMMY LYNN FLORES
ROBERT STEWART FLORES

TO WHOM IT MAY CONCERN:

A Decree of Dissolution of Marriage was entered in the
above-entitled action on AUGUST 11, 1997.

Very truly yours,

JAMES N. CORBETT


Deputy Clerk

cc: CAROL WILSON, ESQ.

18-129

M-O

D112333
 TAMMY FLORES
 vs.
 ROBERT FLORES

FILED
 97 AUG 18 AM 8:59
 JAMES N. CORBETT
 CLERK OF SUPERIOR COURT
 BY *Judy Vane*
 DEPUTY

P 221 980 825

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

PS Form 3800, April 1995

Sent to	
ST. JOSEPH'S HOSPITAL	
Street & Number	
ATTN: PAYROLL	
Post Office, State, & ZIP Code	
350 N. WILMONT RD.	
Postage	\$ 85711
TUCSON, AZ	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
ROBERT STEWART FLORES	
D112333	

P
 A

M-O

FILED
JAMES H. CORBETT
CLERK OF SUPERIOR COURT

97 SEP -3 PH 8:55

V. ARMY

DEPUTY

D112333

TAMMY FLORES

vs.

ROBERT FLORES

is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete Items 1 and/or 2 for additional services.
- Complete Items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

ST. JOSEPH'S HOSPITAL

ATTN: PAYROLL

350 N WILMONT ROAD

TUCSON, AZ 85711

R.S.FLORES D112333

5. Received By: (Print Name)

6. Signature (Addressee or Agent)

[Signature]

PS Form 3811, December 1994

4a. Article Number

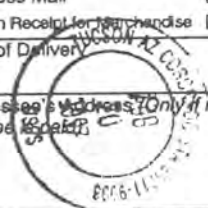
P 221 980 825

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)



Domestic Return Receipt

Thank you for using Return Receipt Service.

M - K

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

FILED
98
DEC -3 PM 4:11

JAMES H. CROCKETT
CLERK OF COURT
BY *[Signature]*

In re the Marriage of
TAMMY LYNN, fka FLORES

No. D-112333

Petitioner

and

AFFIDAVIT RE: MINOR CHILDREN
(ARS 25-439)

ROBERT STEWART FLORES

Respondent

1. Minor children subject to this proceeding are:

CHILD'S NAME: CASEY ALEXANDER FLORES, born February 25, 1987 in Ft. Huachaca, AZ;

DAKOTA RYAN FLORES, born June 12, 1992 in San Antonio, TX

DATES OF RESIDENCE [LAST 5 YEARS]	ADDRESS OF CHILD DURING EACH RESIDENCE PERIOD	NAME OF PERSON(S) HAVING PHYSICAL CUSTODY OF EACH CHILD DURING EACH PERIOD	RELATION TO CHILD
7/92 to 7/93	3300 Voight #31, San Antonio, TX	Robert & Tammy Flores	Father & Mother
7/93 to 7/94	1701 Sunset #35, San Antonio, TX	Robert & Tammy Flores	Father & Mother
7/94 to 7/95	1617 S. Jackson, San Antonio, TX	Robert & Tammy Flores	Father & Mother
1/96 to 8/96	62805 S. Campbell #44104, Tucson, AZ	Robert & Tammy Flores	Father and Mother
8/96 to 8/97	380 W. Taylor #10, Sierra Vista, AZ	Tammy Lynn Flores	Mother
8/97 to 8/98	8869 Grape Creek Rd, San Angelo, TX	Tammy Lynn, fka Flores	Mother
8/98 to Present	305 Amistad, San Angelo, TX	Tammy Lynn, fka Flores	Mother

2. The nature of this action is: Dissolution Legal Separation Annulment

M-K

D112333

Child Custody Modification X Enforcement of Visitation

- 3. The wife is X is not presently pregnant.
- 4. There X are are not minor children of either or both of the parties in this case who are in the custody of either or both of the parties.
- 5. I have X have not participated as a party, witness, or in any other capacity in any other litigation concerning custody of a child mentioned above, in this or any other state. (If affirmative, state name of each child, manner of participation, court, state and county (or district), case number, date of order or judgment, if any.)
- 6. I do X do not have any information of any custody proceeding concerning a child mentioned above pending in a court of this or any other state. (If affirmative, state name of each child, manner of participation, court, state and county (or district), case number, status of proceeding.)
- 7. I do X do not know of any person not a party to this proceeding who has physical custody or claims to have custody or visitation rights with respect to any child mentioned above. (If affirmative, state name and address of person, whether physical custody, claiming custody rights, or claiming visitation rights, name of child involved.)
- 8. Husband's mailing address is: 7014 E. Golf Links Rd. #202 Tucson AZ 85730-1064.
- 9. Wife's mailing address is: 305 Amistad San Angelo TX 76901.

R. Flores

 ROBERT STEWART FLORES

STATE OF ARIZONA)
)
 COUNTY OF PIMA)

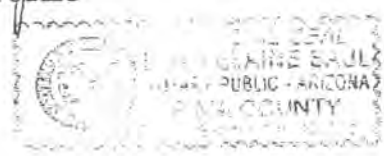
SUBSCRIBED and SWORN TO OR AFFIRMED before me this 3 day of December, 1998.

Lynn Elaine Saul

 NOTARY PUBLIC

My commission expires: 10/10/01

Attorney's Name, Address, Phone:
 Law Office of LYNN ELAINE SAUL, P.C.
 647 North Ninth Ave.
 Tucson AZ 85705
 (520) 882-6226



Computer No. 40164

PCBA DR-04-02
 Revised: 12/93



1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: LYNN ELAINE SAUL
8 State Bar # 3343
9 Pima County Comp. # 40164
10 Attorney for Respondent

FILED
12-3-98
98 DEC -3 1PM 10:10
JAMES M. E. CLERK SUPERIOR COURT

FIL
98 DEC -3
JAMES M. E. CLERK SUPERIOR COURT

11 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
12 IN AND FOR THE COUNTY OF PIMA

13 In Re the Marriage of)
14 TAMMY LYNN, fka FLORES) No: D-112333
15) VERIFIED PETITION FOR
16) ENFORCEMENT OF VISITATION
17) AND CONTEMPT
18) (Unassigned)
19)
20 Respondent.)

REC 12-31-98 10742
CIB 112
1000016
274658
30112333
\$61.00
\$61.00

21 Respondent, ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
22 SAUL, hereby petitions this Court for enforcement of the existing
23 Joint Custody Parenting Plan in this matter, signed by both parties
24 and incorporated into the Decree of Dissolution dated August 11,
25 1997, as follows:

26 1. The parties' Joint Custody Parenting Plan states that the
27 Respondent shall have visitation with the children for the
28 children's Christmas vacation from school in alternate years
beginning with Christmas 1998. The Plan states, "the children
shall spend Christmas Day with their mother and shall be with their
father after that." The Child Support Order entered August 11,
1998 orders Petitioner to pay One Hundred Percent (100%) of the
costs of visitation related travel and transportation expenses.

M-K

1 2. Respondent has attempted to contact Petitioner by telephone
2 for several months to make arrangements for the Christmas
3 visitation, but Petitioner has not returned his calls.
4 Respondent's attorney mailed a letter to Petitioner's attorney,
5 Carol Wilson, on September 17, 1998. Ms. Wilson advised
6 Respondent's attorney that she was no longer retained by the
7 Petitioner and had been unable to contact Petitioner. Respondent's
8 attorney sent a letter dated November 4, 1998 directly to
9 Petitioner's address requesting that Petitioner contact Respondent
10 or his attorney regarding plans for the Christmas visit.
11 Petitioner did not respond.

12 3. Respondent is concerned that Petitioner has not made
13 arrangements which will enable the children to arrive in Tucson at
14 a reasonable time on December 26, 1998 after spending Christmas Day
15 with Petitioner in Texas. Petitioner has not informed Respondent
16 of any airplane or other transportation arrangements, and she will
17 not be able to get the children to Tucson in time for their visit
18 if she drives from San Angelo, Texas, leaving after celebrating
19 Christmas with her parents on December 25, 1998.

20 4. Petitioner has not communicated with Respondent regarding
21 travel plans for previous visits until a week before the visit.
22 Respondent has been unable to secure leave from his job for the
23 visits, for which he needs to give at least six weeks notice. The
24 Petitioner brought the children for the summer visit on the last
25 possible day that CODY could enroll as a late enrollment for summer
26 school, despite knowing that his school had required attendance at
27 summer school as a condition of promotion. For the spring visit,

28

M-K

1 | Petitioner did not drop off the children on the first day of their
2 | vacation, but several days later.

3 | 5. Petitioner has also failed to inform Respondent of a change in
4 | the children's school and of her change of address to San Angelo,
5 | Texas from Grape Creek, Texas. It took Respondent one and a half
6 | months to find out what school the children are attending.
7 | Petitioner has also failed to comply with the provisions of the
8 | Joint Custody Parenting Plan requiring her to provide the school
9 | with a written notice that Respondent should be able to receive
10 | report cards and to provide Respondent with representative samples
11 | of school projects, reports and artwork of the children.
12 | Respondent has had to contact the State Board of Education in order
13 | to obtain information about the children's performance in school.
14 | He has been unable to obtain a report card for CODY, although he
15 | has been able to obtain one for CASEY.

16 | 6. Petitioner also failed to inform Respondent when CODY was
17 | hospitalized with pneumonia in December of 1997. Petitioner
18 | informed Respondent after the fact, at the time of the Christmas
19 | 1997 visit, only that CODY had been ill and Respondent should be
20 | careful. Petitioner did not state the nature of his illness or
21 | that CODY had been in the hospital.

22 | WHEREFORE, Respondent requests this Court to issue an Order to Show
23 | Cause directing Petitioner to appear and show cause, if any she
24 | has, why the following relief should not be granted:

25 | RELIEF REQUESTED BY RESPONDENT:

26 | 1. To hold an expedited Show Cause hearing on this Petition to
27 | Enforce Visitation and Contempt.

28 | 3

M-K

1 2. To find Petitioner in contempt for failing to comply with the
2 terms of the Joint Custody Parenting Plan, signed by both parents
3 and incorporated into the Decree of Dissolution dated August 11,
4 1997, and to impose such sanctions as the Court may deem
5 appropriate, including sanctions to assure visitation, sanctions to
6 assure Respondent's access to the children's school records, and
7 sanctions to assure Respondent's knowledge of any serious medical
8 problems involving the children.

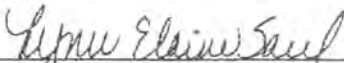
9 3. To issue an Order that Petitioner must deliver the children for
10 visitation with Respondent by 2 p.m. on December 26, 1998, and no
11 later, in accordance with the parties' Joint Custody Parenting
12 Plan.

13 4. To issue an Order that for future visits, Petitioner must
14 contact Respondent at least six weeks in advance in order to make
15 arrangements for mutually-agreeable travel dates and times.

16 5. That the Court order Petitioner to pay Respondent's attorneys
17 fees and costs of this action.

18 6. For such other relief as may be just and reasonable.

19 DATED this 3 day of December 1998.

20
21
22 
23 LYNN/ELAINE SAUL
24 Attorney for Respondent
25
26
27
28

D112333

« VERIFICATION »

STATE OF ARIZONA)
COUNTY OF PIMA)

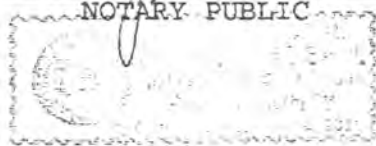
ROBERT STEWART FLORES hereby swears or affirms that he is the Respondent in this matter, and that the contents of this Petition for Enforcement of Visitation are true and correct to the best of his knowledge, information and belief.

R. Flores
ROBERT STEWART FLORES

SUBSCRIBED and SWORN TO OR AFFIRMED before me this 3 day of December, 1998.

Yolande Elaine Saul
NOTARY PUBLIC

My commission expires: 10/10/01



IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

FILED
98 DEC -3 PM 4:11

In re the Marriage of
TAMMY LYNN, fka FLORES

Petitioner,

and

ROBERT STEWART FLORES

Respondent.

No: D-112333

REQUEST FOR ORDER TO SHOW
CAUSE HEARING DATE

0112333

IT IS HEREBY requested that the Order to Show Cause filed with the clerk of Court on ^{12/3/98} be set for hearing.

I. Type of Order to Show Cause:

- | | | | |
|-------------------------------------|---------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | Pre-Judgment | <input type="checkbox"/> | Provisional Remedy |
| <input checked="" type="checkbox"/> | Post-Judgment | <input type="checkbox"/> | Supplemental Proceedings |
| <input type="checkbox"/> | Other | | |

II. Previous matters were heard by Judge/Commissioner _____.

III. Estimated time for hearing: 1/2 Hour(s)

IV. Court reporter required? Yes No

V. Relief Sought:

- | | | | |
|-------------------------------------|------------------|--------------------------|-----------------------------|
| <input checked="" type="checkbox"/> | Contempt | <input type="checkbox"/> | Temporary Restraining Order |
| <input type="checkbox"/> | Injunction | | Modification |
| <input type="checkbox"/> | Special Action | { } | Child Support |
| <input type="checkbox"/> | Appoint Receiver | { } | Spousal Maintenance |
| <input type="checkbox"/> | Wage Assignment | {X} | Visitation- Enforcement |
| <input type="checkbox"/> | Possession | { } | Other: |

VI. The opposing party is represented by: TAMMY LYNN, 305 Amistad, San Antonio, TX 76901 is no longer represented by counsel.

Attorney's Name, Address, Phone
LYNN ELAINE SAUL
LAW OFFICE OF LYNN ELAINE SAUL, P.C.
647 North Ninth Ave.
Tucson AZ 85705
Computer No. 40164

Lynn Elaine Saul
Attorney for Respondent

PCBA 10-13
REVISED: 12/92

M-K

Office of
CLERK OF SUPERIOR COURT, PIMA COUNTY
TUCSON, ARIZONA

CIV No 274658

DATE: 12-3-98

Received from: Lynn Saul

Amount Received: 61.00

Case No. D112333

Caption: TAMMY LYNN Flores vs

Cash Check Money Order Credit Card Robert

- | | | |
|--|---|---|
| New Civil <input type="checkbox"/> | Appearance Fee <input type="checkbox"/> | Passport <input type="checkbox"/> |
| New Dissolution <input type="checkbox"/> | Appeal Fee <input type="checkbox"/> | Marriage License <input type="checkbox"/> |
| New Annulment <input type="checkbox"/> | Cash Bond <input type="checkbox"/> | Notary <input type="checkbox"/> |
| New SP <input type="checkbox"/> | Writ/Subpoena <input type="checkbox"/> | Process Server <input type="checkbox"/> |
| New Domestic <input type="checkbox"/> | Jury Fees <input type="checkbox"/> | Photocopies <input type="checkbox"/> |
| New T Case <input type="checkbox"/> | Post Judgment <input type="checkbox"/> | Search Fee <input type="checkbox"/> |
| Change Venue <input type="checkbox"/> | Transmittal <input type="checkbox"/> | Misc. <input type="checkbox"/> |

Flores
James N. Corbett

By: Mary E. Hays
Deputy Clerk

Respondent

MA

Mary E. Hays

1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: LYNN ELAINE SAUL
8 State Bar # 3343
9 Pima County Comp. # 40164
10 Attorney for Respondent

FILED
JAMES N. CORBETT
CLERK SUPERIOR COURT

98 DEC -8 PM 1:32

BY: E. BRADFORD,
DEPUTY

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
8 IN AND FOR THE COUNTY OF PIMA

9 In re the Marriage of)
10 TAMMY LYNN, nka FLORES,) No: D-112333
11 Petitioner,)
12 and) ORDER TO SHOW CAUSE
13 ROBERT STEWART FLORES) RE: ENFORCEMENT OF
14 Respondent.) VISITATION AND CONTEMPT
15 _____)

16 Upon reading Respondent's Petition for Enforcement of Visitation
17 and Contempt and good cause appearing,

18 IT IS ORDERED that Petitioner shall appear before this Court at the
19 time and place shown, to show cause, if any there be, why the
20 relief requested by Respondent should not be granted.

21 TIME AND PLACE OF HEARING:

22 DATE: December 15, 1998
23 TIME: 10:00 am/pm
24 PLACE: Pima County Superior Court
25 110 West Congress
26 Tucson AZ 85701
27 Division TBA
28



M-0

5752 547

1 RELIEF REQUESTED BY RESPONDENT:

2 1. To hold an expedited Show Cause hearing on this Petition to
3 Enforce Visitation and Contempt.

4 2. To find Petitioner in contempt for failing to comply with the
5 terms of the Joint Custody Parenting Plan, signed by both parents
6 and incorporated into the Decree of Dissolution dated August 11,
7 1997, and to impose such sanctions as the Court may deem
8 appropriate, including sanctions to assure visitation, sanctions to
9 assure Respondent's access to the children's school records, and
10 sanctions to assure Respondent's knowledge of any serious medical
11 problems involving the children.

12 3. To issue an Order that Petitioner must deliver the children for
13 visitation with Respondent by 2 p.m. on December 26, 1998, and no
14 later, in accordance with the parties' Joint Custody Parenting
15 Plan.

16 4. To issue an Order that for future visits, Petitioner must
17 contact Respondent at least six weeks in advance in order to make
18 arrangements for mutually-agreeable travel dates and times.

19 5. That the Court order Petitioner to pay Respondent's attorneys
20 fees and costs of this action.

21 6. For such other relief as may be just and reasonable. *JKM*

22 DATED this day of 12/4/, 1998.

23
24 *[Signature]*
25 JUDGE OF THE SUPERIOR COURT

26 Estimated time: One half hour.



FILED
JAMES N. CORSETT
CLERK SUPERIOR COURT

98 DEC -8 PH 1:33

BY: E. BRADFORD,
DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: LYNN ELAINE SAUL
8 State Bar # 3343
9 Pima County Comp. # 40164
10 Attorney for Respondent

11 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
12 IN AND FOR THE COUNTY OF PIMA

13 In re the Marriage of)
14 TAMMY LYNN, fka FLORES,) No: D-112333
15 Petitioner,)
16 and) MOTION and ORDER TO
17 ROBERT STEWART FLORES,) SHORTEN TIME FOR HEARING
18 Respondent.)

19 Respondent, ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
20 SAUL, hereby respectfully requests this Court to shorten the time
21 for hearing on Respondent's Order to Show Cause Re: Enforcement of
22 Visitation and Contempt, for the reason that the visitation to be
23 enforced is scheduled for the Christmas 1998 holiday.

24 DATED this 3 day of December, 1998.

25 Lynn Elaine Saul
26 LYNN ELAINE SAUL
27 Attorney for Respondent

28 ORDER

UPON READING the foregoing Motion and good cause appearing therefor,

PM-O

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IT IS ORDERED that the Motion to Shorten Time for Hearing is granted, and that the hearing on Respondent's Order to Show Cause Re: Enforcement of Visitation and Contempt be scheduled for December 15, 1998 at 10 (am/pm), Pima County Superior Court, 110 West Congress, Tucson AZ.

DATED this 4th day of December 1998. *SRB*

Doug Mitchell
JUDGE/COMMISSIONER



M-0

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ARIZONA SUPERIOR COURT
PIMA COUNTY

Plaintiff's Attorney

Tammy Lynn Magill)
Plaintiff)

Lynn Saul
Defendant's Attorney

Robert Stewart Flores)
Defendant)

CASE NO. D-112333 DATE: 12/15/98

TYPE OF HEARING: ESC - visitation

EXHIBIT LIST

Iden.	Adm.	Description	Disposition
✓ A	A	copy- Letter dated December 14, 1998	

Envelope.

Ex. Received from C Pearson Date 12-17-98 By WJM

18-80 (3/82)

M-D

1 Law Office of
2 LYNN ELAINE SAUL
3 647 N. Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 State Bar # 3343
8 Pima County Comp. # 40164
9 Attorney for Respondent

FILED
12/15/98
JAMES N. CORBETT, Clerk
C. Pearson Deputy

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
7 IN AND FOR THE COUNTY OF PIMA

8 In re the Marriage of
9 TAMMY LYNN FLORES, nka TAMMY
10 LYNN MAGILL
11 Petitioner,
12 and
13 ROBERT STEWART FLORES,
14 Respondent.

No. D-112333

ORDER TO ENFORCE
VISITATION AND OTHER
CONDITIONS OF JOINT
CUSTODY PARENTING PLAN

15 THIS MATTER COMING ON REGULARLY FOR AN EXPEDITED HEARING ON THE
16 PETITION OF RESPONDENT FOR ENFORCEMENT OF VISITATION AND CONTEMPT,
17 Petitioner TAMMY LYNN (MAGILL) not appearing, but having been
18 served and having agreed to the terms of this Order, and Respondent
19 ROBERT STEWART FLORES appearing by his attorney, LYNN ELAINE SAUL,
20 evidence having been presented and the Court being fully advised,

- 21 I. That the mother, TAMMY LYNN, shall deliver the minor children
22 to the father, ROBERT STEWART FLORES, for the Christmas visit,
23 on December 26, 1998 at 10:00 am, at his home in Tucson.
24 II. That the parties are not yet in agreement on the date and time
25 that the mother shall pick up the children for return after
26 the visit; that the parties shall submit a written stipulation
27 as to that date and time on or before December 24 1998, or in
28

(P)
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1 the event that they have not so stipulated, there shall be a
2 ^{ten}~~five~~-minute hearing on December 28 1998 at 3:00 ~~pm~~ ^{pm} at which DPR
3 point Petitioner may appear telephonically, so that the Court
4 can rule on the date that the children shall be picked up from
5 the father.

6 III. For future visits, Petitioner shall contact Respondent at
7 least six weeks in advance in order to make arrangements for
8 mutually-agreeable travel dates and times. If for some reason
9 these plans cannot be made six weeks in advance, she will
10 notify him as quickly as practicable of her travel plans or
11 any changes in travel plans she has already provided to him.

12 IV. Petitioner shall return telephone calls from Respondent
13 concerning the children.

14 V. Petitioner shall notify Respondent as quickly as possible in
15 the event that either of the children suffer from serious
16 illness or are hospitalized.

17 VI. Petitioner shall inform the children's schools that they are
18 to provide any and all requested information, regular report
19 cards, and other material concerning the minor children
20 directly to Respondent.

21 VII. All provisions of the existing Joint Custody Parenting Plan
22 incorporated by reference into the Decree of Dissolution of
23 these parties remain in effect.



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D 112333

1 VIII. Each party shall pay his, or her own attorney's fees and court
2 costs of this proceeding.

3
4 DONE IN OPEN COURT this 15 day of December, 1998.

5
6
7 Ray Mitchell
8 JUDGE/JUDGE PRO TEMPORE
9

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FILED
JAMES N. CORBETT
CLERK SUPERIOR COURT

98 DEC 17 AM 11:59

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE PRO TEMPORE: HON. DOUGLAS MITCHELL AND, BY HON. JAMES N. CORBETT, CLERK. CASE NO. **D-112333**

COURT REPORTER: NONE

DATE: December 15, 1998

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES

Petitioner

and

ROBERT STEWART FLORES

Respondent

Lynn Elaine Saul

Respondent's Attorney

MINUTE ENTRY

RE: ORDER TO SHOW CAUSE - VISITATION:

No parties are present.

Ms. Saul provides the current status of the case, advises that the only issue remaining is the date and time that the mother will pick up the children for return after the visit, and presents the Court with an Order to Enforce Visitation and Other Conditions of Joint Custody Parenting Plan.

Respondent's Exhibit A, being a copy of a letter dated December 14, 1998, is identified and admitted.

IT IS ORDERED setting a review hearing on December 28, 1998, in the event the parties have not reached a stipulation regarding pick-up of the children, for 10 minutes in a division to be assigned.

ORDER SIGNED.

cc: Hon. Douglas Mitchell
Domestic Calendaring
Lynn Elaine Saul, Esq.
Carol Wilson, Esq.

Cathy Pearson
Deputy Clerk

M-0

IN THE ARIZONA SUPERIOR COURT STATE OF ARIZONA, COUNTY OF PIMA

0112333

AUTHORIZED OFFICER'S RETURN

Court #

JAMES H. CORBETT
CLERK SUPERIOR COURT

CAUSE # D112333

IN RE THE MARRIAGE OF TAMMY LYNN, NKA FLORES,

98 DEC 24 PM 2:06

VS

ROBERT STEWART FLORES

BY: E. BRADFORD,
DEPUTY

Came to hand on the 10 day of DECEMBER, 1998 at 11:30 o'clock A.M

Documents received for service:

ORDER TO SHOW CAUSE RE: ENFORCEMENT OF VISITATION & CONTEMPT
MOTION AND ORDER TO SHORTEN TIME FOR HEARING; AFFIDAVIT RE:
MINOR CHILDREN; VERIFIED PETITION FOR ENFORCEMENT

Executed on the 10 day of DECEMBER, 1998 at 4:05 o'clock P.M.

Executed at 305 WILSTED City of SAN ANGELO
within the County of TALL GREEN State of TEXAS by delivering

to: Lynn, Tammy
Tammy Lynn Nka Flores

a true copy of the documents listed above having first endorsed on the date of delivery in the following manner;

- by delivering to the above in person.
- (Substitute Service) per Rule 106/536 Order by delivering to _____ in person over the age of sixteen then residing therein, to wit: _____
- by posting; by securely affixing to the main door at the above address, per Rule 106/536 Order.
- by delivering them to an officer or managing agent whose name and title is: _____
- Other: _____

Not Executed for the following reasons: _____

I, am over the age of eighteen, not a party to nor interested in the outcome of the above numbered suit and am authorized by written order of the court to serve citations and other notices.

Service Fee \$ _____

Ambly Richards
Printed Name: AMBLY RICHARDS
Authorized Person OR# _____
Professional Civil Process
105 W. Riverside, #120
Austin, Texas 78746 (512) 477-3500

STATE OF TEXAS



Before me, a notary public, on this day personally appeared the above named authorized person known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn declared that the statements therein contained are true and correct. Given my hand and seal of office on this the 10 day of DECEMBER 1998.

Darrell Freeman
NOTARY PUBLIC SIGNATURE

BEST COPY

M-0

ARIZONA SUPERIOR COURT
PIMA COUNTY

In re Robert Flores
Plaintiff's Attorney

Tammy Lynn Flores }
Plaintiff

Robert Stewart Flores }
Defendant

Lynn Elaine Saul
Defendant's Attorney

CASE NO. D-112333 DATE: 12/20/98

TYPE OF HEARING: Removal Hrg.

EXHIBIT LIST

Iden.	Adm.	Description	Disposition
✓ A	A	Copy of School Calendar	

Envelpes.

Ex. Received from S. Mason Date 12-30-98 By SMN

FILED
JAMES H. CORBETT
CLERK SUPERIOR COURT

ARIZONA SUPERIOR COURT, PIMA COUNTY

99 DEC 30 AM 8:44

12-30-98

JUDGE PRO TEMPORE: HON. KAREN NYGAARD
BY: H. MULHOLLAND, DEPUTY CASE NO. D-112333

COURT REPORTER: NONE

DATE: December 28, 1998

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES

Petitioner

In Proper Person

Petitioner's Attorney

and

ROBERT STEWART FLORES

Respondent

Lynn Elaine Saul

Respondent's Attorney

MINUTE ENTRY

REVIEW HEARING:

Both parties present.

Ms. Saul indicates that Ms. Wilson may no longer be representing the petitioner in this matter.

Ms. Saul and petitioner make statements to the Court.

Tammy Lynn and Robert Flores are sworn, examined and questioned by the Court.

Petitioner's Exhibit 1, being a Copy of School Calendar, is **identified and admitted**.

Ms. Saul and petitioner argue to the Court.

IT IS ORDERED that respondent shall have physical custody of the minor child for his Christmas visitation until January 2, 1999 at 12:00 noon, at which time petitioner shall pick the child up to return to Texas.

The Court's interpretation of the Parenting Plan for future years is that Christmas vacation includes all the time off from school which is contiguous to Christmas vacation.

Petitioner is admonished to abide by the Parenting Plan. Any failure to comply with the Court's orders, including failure to follow the Joint Parenting Plan, could result in a finding of contempt of court and in sanctions being imposed, up to and including incarceration.

Sally Mason
Deputy Clerk



5768 321


MINUTE ENTRY

Page: 2

Date: December 28, 1998

Case No: **D-112333**

Petitioner is further admonished that, should it be necessary for respondent to come back to court again to enforce his visitation rights, attorney's fees shall be assessed against her.


HON. KAREN NYGAARD

cc: Hon. Karen Nygaard
Domestic Calendaring
Lynn Elaine Saul
Tammy Lynn - 305 Amistad, San Angelo, TX
Carol Wilson, Esq.



Sally Mason
Deputy Clerk

5768 322

Office of
CLERK OF SUPERIOR COURT, PIMA COUNTY
TUCSON, ARIZONA

CIV No 322490

DATE: 1-21-99

Received from:

Elaine Saul

Amount Received:

61.00

Case No.

D112333

Caption:

Tammy Flores vs Robert Flores

Cash Check Money Order Credit Card

- | | | |
|--|---|---|
| New Civil <input type="checkbox"/> | Appearance Fee <input type="checkbox"/> | Passport <input type="checkbox"/> |
| New Dissolution <input type="checkbox"/> | Appeal Fee <input type="checkbox"/> | Marriage License <input type="checkbox"/> |
| New Annulment <input type="checkbox"/> | Cash Bond <input type="checkbox"/> | Notary <input type="checkbox"/> |
| New SP <input type="checkbox"/> | Writ/Subpoena <input type="checkbox"/> | Process Server <input type="checkbox"/> |
| New Domestic <input type="checkbox"/> | Jury Fees <input type="checkbox"/> | Photocopies <input type="checkbox"/> |
| New T Case <input type="checkbox"/> | Post Judgment <input type="checkbox"/> | Search Fee <input type="checkbox"/> |
| Change Venue <input type="checkbox"/> | Transmittal <input type="checkbox"/> | Misc. <input type="checkbox"/> |

Patricia A. Noland, Clerk

M-O

By:

Mary Elb

Deputy Clerk

Mary E. Mayo

Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

FILED

IN AND FOR THE COUNTY OF PIMA

99 JAN 21 PM 2:54

In re the Marriage of
TAMMY LYNN FLORES, nka MAGILL,
Petitioner,
and
ROBERT STEWART FLORES,
Respondent.

No: D-112333
PAUL J. HANCOCK
DEPUTY CLERK OF COURT
BY: [Signature]
REQUEST FOR ORDER TO SHOW
CAUSE HEARING DATE

D 112333

IT IS HEREBY requested that the Order to Show Cause filed with the Clerk of Court on 1/20/99 be set for hearing.

I. Type of Order to Show Cause:

- Pre-Judgment
- Post-Judgment
- Other
- Provisional Remedy
- Supplemental Proceedings

II. Previous matters were heard by Commissioner Karen Nygaard.

III. Estimated time for hearing: 1 Hour(s)

IV. Court reporter required? Yes No

V. Relief Sought:

- Contempt
- Injunction
- Special Action
- Appoint Receiver
- Wage Assignment
- Possession
- Temporary Restraining Order Modification
- Child Support
- Spousal Maintenance
- Visitation
- Other:

VI. The opposing party is represented by: N/A

Attorney's Name, Address, Phone
LYNN ELAINE SAUL
LAW OFFICE OF LYNN ELAINE SAUL, P.C.
647 N. Ninth Ave.
Tucson AZ 85705

Lynn Elaine Saul
Attorney for Respondent

Computer No. 40164

PCBA DR-13
REVISED: 12/92

** NOTE: Please do not set before 2/22/99, so Respondent will have time to serve Respondent by certified mail. Thank you. **



FILED

99 JAN 21 PM 2:54

FATIMAH HOLLAND
CLERK SUPERIOR COURT
BY: *[Signature]*

(1) Person Filing: LYNN ELAINE SAUL
Address: 647 North Ninth Avenue
TUCSON AZ 85705
Phone: (520) 882-6226
Representing: RESPONDENT
State Bar Number: 3343; PCC # 40164
Atlas Number:

SUPERIOR COURT OF ARIZONA, COUNTY OF (2) PIMA

(3) TAMMY LYNN FLORES, nka MAGILL)
Petitioner,)
02/04/64 [REDACTED])
DOB SSN)
vs.)
(4) ROBERT STEWART FLORES)
Respondent,)
02/24/61 [REDACTED])
DOB SSN)

Case No. (5) D-112333

PARENT'S WORKSHEET FOR
CHILD SUPPORT AMOUNT

Prepared By: (6) Father Mother
 Court State

Adopted by Court Yes No

MONTHLY GROSS INCOME

	<u>Father</u>	<u>Mother</u>
Total Monthly Gross Income		
(7) Estimated/Attributed to: <input type="checkbox"/> Father <input checked="" type="checkbox"/> Mother (Explain on page 5)	\$1,079.00 (8)	\$912.00

DEDUCTIONS FROM / ADDITIONS TO MONTHLY GROSS INCOME

Court Ordered Spousal Maintenance Received +/- Paid	\$0.00 (9)	\$0.00
Court Ordered Child Support Actually Paid or Contributed for <u>Other</u> Children	\$0.00 (10)	\$0.00
Cost of Supporting Other Children (Explain on page 5)	\$0.00 (11)	\$0.00
Adjusted Monthly Gross Income for Each Parent (add or subtract lines 9 through 11 from line 8)	\$1,079.00 (12)	\$912.00
<u>COMBINED ADJUSTED MONTHLY GROSS INCOME</u>	(13) \$1,991.00	



BASIC CHILD SUPPORT OBLIGATION

Number of children for whom support is requested: (14) 2
Basic Child Support Obligation (from the Schedule) (15) \$551.00

ADJUSTMENT FOR NECESSARY EXPENSES

Medical Insurance Premium for Children paid by (You may also need to complete item 30) Mother Father (16) \$150.00
Child Care Costs (Explain on page 5) Mother Father (17) \$0.00
Extra Education Expenses (18) \$0.00
Number of Child(ren) 12 and Over: 0 (Explain on page 5) (19) \$0.00
Extrardordinary Child (20) \$0.00
Total Adjustments for Necessary Expenses (21) \$150.00

TOTAL CHILD SUPPORT OBLIGATION

Total Child Support Obligation (add lines 15 and 21) (22) \$701.00

EACH PARENT'S PERCENTAGE (%) OF COMBINED INCOME

Calculate for each parent:

	<u>Father</u>	<u>Mother</u>
Adjusted gross income (from line 12)	\$1,079.00 (23)	\$912.00
Combined adjusted gross income (from line 13)	(24)	\$1,991.00
Adjusted gross income DIVIDED BY combined adjusted gross income EQUALS	54.19% (25)	45.81%

EACH PARENT'S PERCENTAGE (%) OF THE TOTAL SUPPORT OBLIGATION

Calculate for each parent:

	<u>Father</u>	<u>Mother</u>
Total child support obligation (from line 22)	(26)	\$701.00
Percentage of combined adjusted gross income (from line 25)	54.19% (27)	45.81%
Percentage TIMES the total obligation EQUALS the amount of the parent's support obligation	\$379.90 (28)	\$321.10

ADJUSTMENT FOR COSTS ASSOCIATED WITH VISITATION

Requested Adjustment to be completed for paying parent ONLY

Number of Visitation Days: 75 (Explain on page 6)
Visitation Table Percentage 18.70% X Line 15 = \$103.04 (29) \$0.00

MEDICAL INSURANCE PREMIUM ADJUSTMENT

Complete this item ONLY if the parent who will be ordered to pay support is also the parent who will pay the medical insurance premium. Enter the premium amount paid directly to insurance carrier by parent ORDERED to pay support from line 16.

Father Mother

\$0.00 (30) \$0.00

NON-CUSTODIAL CHILD CARE ADJUSTMENT

Enter the annualized amount paid directly by the non-custodial parent for work related child care.

\$0.00 (31) \$0.00

COURT APPROVED DISCRETIONARY VISITATION ADJUSTMENT

Adjustment for Additional Costs, NOT to exceed 16% of line 15.
(Explain on page 6)

\$0.00 (32) \$0.00

ADJUSTMENTS SUBTOTAL

Add lines 29 through 32.

\$103.04 (33) \$0.00

PRELIMINARY CHILD SUPPORT AMOUNT

Deduct line 33 from line 28.

\$276.86 (34) \$321.10

SELF SUPPORT RESERVE TEST

Paying parent's ADJUSTED gross income (Line 12) minus -\$645.00 = the resulting amount.

\$434.00 (35) \$267.00

If this amount is less than the Preliminary Child Support Amount, the court SHALL order the resulting amount as child support order on line 35, absent a deviation.

AMOUNT TO BE ORDERED BASED ON THESE CALCULATIONS

Enter the lesser of the amounts shown on line 34 or line 35.

\$277 (36) \$267
(Father) (Mother)

DEVIATION FROM THE GUIDELINES SUPPORT AMOUNT

If you believe the Guidelines support amount is too high or too low in your case, enter the amount which you believe the court should order as child support in this case. Explain why on page 6.

\$0.00 (37) \$0.00
(Father) (Mother)

RESPONSIBILITY FOR VISITATION-RELATED TRAVEL EXPENSES

Enter on this line the amount or percentage you think each parent should pay towards the travel/transportation expenses associated with visitation. The allocation of travel expenses does not change the amount of the support ordered. Explain on page 6.

(38) 100
(Father) (Mother)

RESPONSIBILITY FOR MEDICAL EXPENSES NOT PAID BY INSURANCE

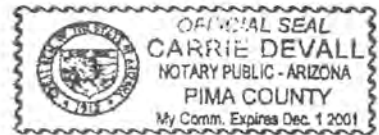
Percentage of uninsured medical expenses that each parent should pay.

54% (39) 46%
(Father) (Mother)

I have read this document, and the facts are true and correct to the best of my knowledge or belief.

(40) Person Filing *R Flores* Date: 1/14/99

STATE OF ARIZONA)
COUNTY OF PIMA) ss.



Subscribed and sworn or affirmed and acknowledged before me this date:

12-01-2001
Notary Expiration Date

Carrie Devall
Notary Public or Clerk

I have read this document, and the information provided is an accurate representation of the facts as supplied to me by *Robert Flores*.

Attorney Filing: *Yvonne Elaine Sul* Date: 1-20-99

M-K

BASIS FOR AMOUNTS SHOWN ON WORKSHEET

(7) Estimated/Attributed Income - Explain why you believe the other party is or could be earning the amount you indicated. Be as specific as possible. See the instructions for item 7 for examples.

(11) Cost of Supporting Other Children - Follow the instructions for item 11. List the names and ages of the natural or adopted children for whom you are requesting an adjustment and describe the support you provide for these children.

Name	Date of Birth	Social Security Number
	/ /	- -
	/ /	- -
	/ /	- -

(14) Children for whom Support is Requested - List the names and ages of the natural or adopted children for whom you are requesting support.

Name	Date of Birth	12 or over Y/N	Social Security Number
CASEY ALEXANDER FLORES	02/ 25/ 87	N	- -
DAKOTA RYAN FLORES	06/ 12/ 92	N	- -
	/ /	N	- -
	/ /	N	- -

(17) Child Care Costs - If the custodial parents income is in excess of the chart in [Guidelines 8.b.1.], the court may adjust the cost of day care in order to apportion the dependent care tax credit benefit. The court may reduce the annualized amount of day care by 25% with a maximum monthly reduction of \$50 per month for one child, \$100 per month for two or more children.

Custodial Parent

Monthly Child Care Costs	X	Number of months	=	Annual Cost	X	.75	=	Adjusted Cost	/	12	=	Adjusted Monthly Cost
\$0.00	X	0.00	=	\$0.00	X	.75	=	\$0.00	/	12	=	\$0.00

Non-Custodial Parent

Child Care Costs	X	# of months	/	12	=	Adjusted Monthly Cost
\$0.00		0.00	/	12	=	\$0.00

(19) Child 12 and Over - Follow the worksheet instructions for item 19. Explain why you need extra money to support the child(ren) age 12 and over.

(29) Adjustment for Costs Associated with Visitation - Calculate the number of visitation days per year. [Guidelines 10]

Extended periods	56.00 days	Weekend periods	0.00 days
Holiday periods	7.00 days	Midweek periods	0.00 days
School breaks	13.00 days	Other periods	0.00 days

(32) Court Approved Discretionary Visitation Adjustment - Upon proof that in the best interests of the child costs for clothing and personal care items are duplicated, equally shared or incurred primarily by the non-custodial parent, the court may make a further adjustment if visitation exceeds 129 days. The amount of the adjustment shall not exceed 16% of line 15. Explain the basis of the requested adjustment:

(37) Deviation From the Guidelines Support Amount - if you believe the Guidelines support amount is too high or too low in your case, explain why. READ THE GUIDELINES GENERALLY AND SECTION 17 IN PARTICULAR. (This does not include physical custody adjustments; those are considered in items 29 and 32.) Show the total support amount you believe should be ordered. A deviation can only be ordered if the court makes appropriate findings.

Requested Support Amount: \$0.00

(38) Visitation-Related Travel Expenses - Describe the anticipated visitation plan and related travel/transportation costs. The court may consider how the conduct of each parent has contributed to such costs. Explain how you think the cost should be divided between the parents. Enter the amount or percentage you think each parent should pay on line 36. The allocation of travel expenses does not change the amount of the support ordered.

The Decree of Dissolution provides that the Petitioner, Tammy Lynn, will pay for all costs of transportation.

Federal Tax Exemption - Explain how you want the tax exemptions for the child(ren) allocated. [Guidelines 25]

Father shall claim both children in odd-numbered years. Both parties shall claim one child in even-numbered years.

Other Requests - Identify and explain any additional issues you want the court to address.



ARIZONA SUPERIOR COURT, PIMA COUNTY FILED

<p>Tammy Lynn Flores, nka Magill Petitioner,</p> <p>vs. Robert Stewart Flores Respondent,</p>	<p>No. D-112333</p> <p style="text-align: center;">SPOUSE'S FINANCIAL AFFIDAVIT</p> <p><input type="checkbox"/> As of date of order sought to be modified <input checked="" type="checkbox"/> Current</p>	<p style="text-align: right;">99 JAN 21 PM 2:54</p> <p style="text-align: right;">PATRICIA A. HANCOCK CLERK OF SUPERIOR COURT BY: <i>[Signature]</i></p>
---	--	--

NAME: ROBERT STEWART FLORES BIRTHDATE: 2-24-61
 ADDRESS: 7014 E. GOLF LINKS RD #202 SSN: [REDACTED]
TUCSON, AZ 85730-1064

NECESSARY MONTHLY EXPENSES

For yourself & minor child(ren) residing with you

Housing (rent/mtg) \$ 250⁰⁰
 Repair/Upkeep: \$ _____
 Utilities
 Electricity \$ _____
 Gas \$ _____
 Water \$ _____
 Phone \$ 20⁰⁰
 Garbage \$ _____

OTHER MONTHLY EXPENSES

Creditor	Balance	Payment
Scars	\$ 170	\$ 20 ⁰⁰
Chase Master Card	\$ 300	\$ 20 ⁰⁰
ASAP Student Loan	\$ 380	\$ 50 ⁰⁰
MADZ Comm	\$ 986.04	\$ 10 ⁰⁰
Dakota Com	\$ 171 ⁰⁰	\$ 15 ⁰⁰
Patrol Loan	\$ 650	\$ 20 ⁰⁰

Food & Household Supplies: \$ 200⁰⁰

TOTAL MONTHLY PAYMENTS. \$ 135.00

Work/School Lunch: \$ 100⁰⁰

TOTAL MONTHLY EXPENSES/PAYMENTS . . . \$ 1020.00

Medical, dental, drugs, supplies: \$ _____

GROSS PAYCHECK (YTD AVERAGE). \$ 500⁰⁰

Insurance not deducted from pay: \$ _____

[check one]
 weekly x 4.3 twice mo. x 2
 monthly every 2 wks x 2.16

Clothing: \$ 100⁰⁰

GROSS MONTHLY INCOME. \$ 1079⁰⁰

Laundry/Dry Cleaning: \$ _____

GROSS PAYCHECK (current) \$ 500⁰⁰

Child Care/Sitter: \$ _____

Less:

Fed. Taxes	\$ 23.12
State Taxes	\$ 6.47
FICA	\$ 35.49
Credit Union	\$ _____
Insurance	\$ _____
Union Dues	\$ _____
Savings, etc.	\$ _____
Other - Pre/Post Tax	\$ 35.06

Support paid for spouse and/or minor children of prior marriage: \$ _____

Total Deductions \$ 100.14
 Net Paycheck \$ 400.00

Car Repair/Maint. \$ 100⁰⁰ 75⁰⁰

OTHER MONTHLY INCOME

Car Insurance \$ 35⁰⁰

Pension/Retirement \$ _____

Gas/Oil \$ 60⁰⁰

Social Security/SSI \$ _____

License \$ 25⁰⁰

Dividends/Interest \$ _____

Bus/Taxi Fares \$ _____

GA/AFDC \$ _____

Other: \$ _____

Rec'd. for minor child(ren) not of this marriage under your care \$ _____

Other: \$ _____

Other: \$ _____

Total Monthly Expenses. \$ 885.00

TOTAL OTHER INCOME. \$ _____

TOTAL MONTHLY INCOME. \$ 1079.00

Computer No. 40164

PCSA DR-05-01

0112333

Present Occupation: Licensed Practical Nurse starting 28 Feb 96
Name, Address, phone number of present employer: St. Josephs Hospital 350 N. Wilcox Rd
(915) 721-3905

Prior Occupation: Licensed Practical Nurse Starting Date: 8/26/95
Ending Date: 2/20/96
Monthly pay: _____
Name, Address, phone number of prior employer: Flower Square Health Care Center
2602 N. Dodge, Tucson, AZ

If not employed, why? _____
Do you expect to work? _____ If so, when? _____ Anticipated Occupation: _____

Name(s) and age(s) of minor child(ren) residing with you: _____

Are you or your spouse pregnant? [] yes [X] no if yes, estimated delivery date: _____

Physical defect or organic disease suffered by you or your minor children: _____

List all bank accounts, including checking, savings, credit union, certificates of deposit, in your name, in both spouses, or in which you have an interest:

Bank/Branch	Type of Account	Account Number	Amount
<u>Saguaro Credit Union</u>	<u>checking/savings</u>	<u>52012</u>	<u>7⁰⁰/52⁰⁰</u>
<u>1st Community Federal Credit</u>	<u>Savings</u>	<u>96765003</u>	<u>52⁵⁰</u>
_____	_____	_____	_____
_____	_____	_____	_____

List all cash under your control and stocks, shares and/or bonds in yours or your spouse's name or in which you or your spouse have an interest. _____

Attorney fees paid to date: \$ _____ Court costs paid to date: \$61.00

List all debts not included in monthly payments schedule on page 1:

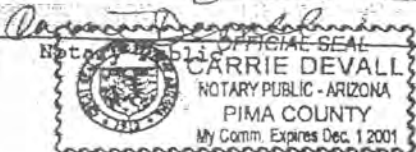
Creditor	Balance	Payment	Creditor	Balance	Payment
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

R. Flower LPN
Petitioner/Respondent

STATE OF ARIZONA)
County of Pima) ss.

SUBSCRIBED AND SWORN/AFFIRMED TO, before me this 14th day of January, 1999

My Commission Expires: _____
Affiant's Attorney and Address _____



1 *Law Office of*
 2 **LYNN ELAINE SAUL, P.C.**
 3 *647 North Ninth Avenue*
Tucson AZ 85705
 4 *(520) 882-6226*
Fax (520) 882-7678
 5 *By: LYNN ELAINE SAUL*
State Bar # 3343
Pima County Comp. # 40164
 6 **Attorney for Respondent**

FILED
 99 JAN 21 PM 2:52
 PATRICIA A. HOLLAND
 CLERK, SUPERIOR COURT
 BY *[Signature]*
 DEPUTY

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
 8 IN AND FOR THE COUNTY OF PIMA

9	In re the Marriage of)	
10	TAMMY LYNN FLORES, nka MAGILL,)	No. D-112333
11	Petitioner)	
12	and)	PETITION FOR MODIFICATION OF CHILD SUPPORT
13	ROBERT STEWART FLORES,)	
14	Respondent)	

250 01-21-99 10:25
 2-12 11:04
 2000 12:00
 161.00

15 Respondent, ROBERT STEWART FLORES, hereby requests this Court to
 16 modify the Arizona child support order in this case entered on
 17 September 11, 1997 by the Hon. Richard Nichols, as follows:

18 I. The circumstances of the parties have substantially and
 19 materially changed since the entry of the previous child support
 20 order in this case, in that Respondent is earning substantially
 21 less income due to changes at his employment which force him to
 22 work less hours and his enrollment part time in the University of
 23 Arizona College of Nursing working towards a BSN degree in Nursing.
 24 Respondent's education and training in his profession of nursing is
 25 reasonably calculated to substantially enhance his earning
 26 capacity. When he earns the BSN degree, Mr. Flores will be
 27
 28



1 eligible to take the exam to become a Registered Nurse, which will
2 allow him to earn significantly more money to benefit the minor
3 children.

4 II. A Parent's Worksheet for Child Support Amount is filed by
5 Respondent to accompany this Petition. According to the Worksheet
6 Calculations (item 34), the child support amount should be \$277 per
7 month to be paid by Respondent.

8 III. The following calculations show that the requested change
9 varies from the currently ordered amount by 15% or more:

10 $400 - 277 = 123$

11 $(123) \% (400) = 30\%$

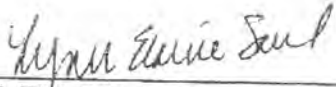
12 WHEREFORE Petitioner requests that the Child Support Order in this
13 case be modified as follows:

14 1. That child support in this case be modified due to a
15 substantial and material change in circumstances.

16 2. That a new Child Support Order and Order of Assignment be
17 entered ordering Respondent to pay \$277.00 per month as child
18 support for DAKOTA RYAN FLORES and CASEY ALEXANDER FLORES.

19 3. That the Court order any other relief as may be necessary and
20 just.

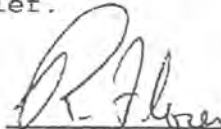
21 DATED this 20 day of January, 1999.

22
23 
24 _____
25 LYNN ELAINE SAUL
26 Attorney for Respondent
27
28

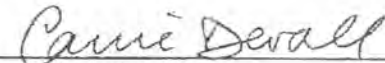
VERIFICATION

1
2 STATE OF ARIZONA)
3)
4 COUNTY OF PIMA)

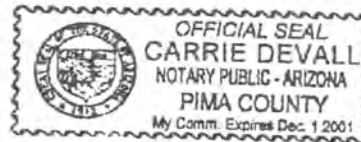
5 Robert Stewart Flores hereby swears or affirms that he is the
6 Respondent in this matter, and that the contents of this Petition
7 for Modification of Support are true and correct to the best of
8 his knowledge, information and belief.

9 
10 _____
ROBERT STEWART FLORES

11 SUBSCRIBED and SWORN TO OR AFFIRMED before me this 14th day of
12 January, 1999.

13 
14 _____
NOTARY PUBLIC

15 My commission expires:



FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

99 JAN 25 PM 6:45

BY: V. ARMY, DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: LYNN ELAINE SAUL
8 State Bar # 3343
9 Pima County Comp. # 40164
10 Attorney for Respondent

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
8 IN AND FOR THE COUNTY OF PIMA

9 In re the Marriage of)
10 TAMMY LYNN FLORES, nka MAGILL,)
11 Petitioner,)
12 and)
13 ROBERT STEWART FLORES,)
14 Respondent.)
15 _____)

No: D-112333

ORDER TO SHOW CAUSE

**CONFIRMATION DUE
PURSUANT TO LOCAL RULE 8.3(E)-**

16 Upon reading Respondent's Petition for Modification of Child
17 Support and good cause appearing,

18 IT IS ORDERED that Petitioner shall appear before this Court at the
19 time and place shown, to show cause, if any there be, why the
20 relief requested by Respondent should not be granted.

21 TIME AND PLACE OF HEARING:

22 DATE: February 26, 1999

23 TIME: 11:00 am/pm

24 PLACE: Pima County Superior Court
25 110 West Congress
26 Tucson AZ 85701

27 Division TBA

5783

595

R


1 RELIEF REQUESTED BY RESPONDENT:

2 1. That child support in this case be modified due to a
3 substantial and material change in circumstances.

4 2. That a new Child Support Order and Order of Assignment be
5 entered ordering Respondent to pay \$277.00 per month as child
6 support for DAKOTA RYAN FLORES and CASEY ALEXANDER FLORES.

7 3. That the Court order any other relief as may be necessary and
8 just.

9 DONE IN OPEN COURT this 9th day of January, 1999.


10
11 JUDGE OF THE SUPERIOR COURT
12

13
14 Estimated time: One Hour.
15
16
17
18
19
20
21
22
23
24
25
26
27
28

M-H

R

99 FEB -4 PM 6:17

BY: V. ARMY, DEPUTY

1 Law Office of
 LYNN ELAINE SAUL, P.C.

2 647 North Ninth Avenue

Tucson AZ 85705

3 (520) 882-6226

Fax (520) 882-7678

4 By: LYNN ELAINE SAUL

State Bar # 3343

5 Pima County Comp. # 40164

6 Attorney for Petitioner

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

8 IN AND FOR THE COUNTY OF PIMA

9 In re the Marriage of)

10 TAMMY LYNN FLORES, nka MAGILL)

11 Petitioner,)

12 and)

13 ROBERT STEWART FLORES,)

14 Respondent.)

No: D-112333

AFFIDAVIT OF SERVICE BY
 MAIL

(Hon. David R. Ostapuk)

15 Respondent, ROBERT STEWART FLORES, by his attorney LYNN ELAINE
 16 SAUL, hereby files this Affidavit of Service by Mail pursuant to
 17 Rule 4.2 of the Arizona Rules of Civil Procedure:

18 I. The undersigned attorney for Respondent deposited the following
 19 documents in the Post Office, postage pre-paid to be sent to
 20 Petitioner by certified mail requiring a signed a returned receipt,
 21 on January 28, 1999: Copies of Order to Show Cause, Petition for
 22 Modification of Child Support, Child Support Worksheet, Current and
 23 old Spousal Financial Affidavits, Blank Financial Affidavits, and
 24 Copy of Superior Ct. Rule 8.4.

25 II. Petitioner is known to be located outside the State of
 26 Arizona, specifically San Angelo, TX.

27 III. The Summons and copies of Pleadings set forth in paragraph 1
 28

MI

1 were dispatched to Petitioner.
2 IV. The Summons and copies of Pleadings set forth in paragraph 1
3 were in fact received by Respondent as evidenced by the receipt
4 attached hereto as exhibit A and part hereof.

5 V. Petitioner received the Summons and other pleadings as set
6 forth in paragraph 1 on 2/2/99 and the receipt was returned to the
7 undersigned attorney on 2/4/99.

8 DATED this 2/4/99

9
10 Lynn Elaine Saul
11 LYNN ELAINE SAUL
Attorney for Respondent

12 STATE OF ARIZONA)
13 COUNTY OF PIMA)

14 LYNN ELAINE SAUL hereby swears or affirms that she is the Attorney
15 for Respondent in this matter, and that the contents of this
16 Affidavit of Service are true and correct to the best of her
17 knowledge, information and belief.

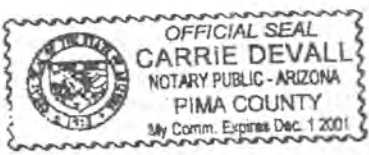
18
19 Lynn Elaine Saul
20 LYNN ELAINE SAUL

21 SUBSCRIBED and SWORN TO OR AFFIRMED before me this 4th day of
22 February, 1999.

23 Carrie Devall
24 NOTARY PUBLIC

25 My commission expires:

26 Copy mailed this 4th day
27 of February, 1999 to
28 TAMMY LYNN MAGILL
305 Amistad
San Angelo, TX 76901



MI

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Tammy Lynn Magill
 305 Amistad
 San Angelo, TX 76901

4a. Article Number
 P 476 711 764

4b. Service Type

<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Certified
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured
<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> COD

7. Date of Delivery
 7/12/99

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)
 X *Tammy Magill*

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994 102505-08-B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.

MI

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
 IN AND FOR THE COUNTY OF PIMA

FILED

99 FEB 18 AM 9:43

PATRICK J. HULLAND
 CLERK SUPERIOR COURT
 BY *[Signature]*
 DEPUTY

Keith Ulisano

In re the Marriage of)
)
 TAMMY LYNN MAGILL, fka FLORES)
)
 Petitioner)
)
 and)
)
 ROBERT STEWART FLORES)
)
 Respondent)

No. D-112333

AFFIDAVIT RE: MINOR CHILDREN
 (ARS 25-439)

1. Minor children subject to this proceeding are:

CHILD'S NAME: CASEY ALEXANDER FLORES, born February 25, 1987 in Ft. Huachaca, AZ;
DAKOTA RYAN FLORES, born June 12, 1992 in San Antonio, TX

DATES OF RESIDENCE [LAST 5 YEARS]	ADDRESS OF CHILD DURING EACH RESIDENCE PERIOD	NAME OF PERSON(S) HAVING PHYSICAL CUSTODY OF EACH CHILD DURING EACH PERIOD	RELATION TO CHILD
7/92 to 7/93	3300 Voight #31, San Antonio, TX	Robert & Tammy Flores	Father & Mother
7/93 to 7/94	1701 Sunset #35, San Antonio, TX	Robert & Tammy Flores	Father & Mother
7/94 to 7/95	1617 S. Jackson, San Antonio, TX	Robert & Tammy Flores	Father & Mother
1/96 to 8/96	62805 S. Campbell #44104, Tucson, AZ	Robert & Tammy Flores	Father and Mother
8/96 to 8/97	380 W. Taylor #10, Sierra Vista, AZ	Tammy Lynn Flores	Mother
8/97 to 8/98	8869 Grape Creek Rd, San Angelo, TX	Tammy Lynn, fka Flores	Mother
8/98 to Present	305 Amistad, San Angelo, TX	Tammy Lynn, fka Flores	Mother

2. The nature of this action is: Dissolution Legal Separation Annulment

M-0

0112333

Child Custody Modification X Enforcement of Visitation

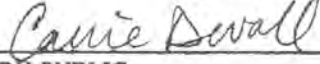
- 3. The wife is X is not presently pregnant.
- 4. There X are are not minor children of either or both of the parties in this case who are in the custody of either or both of the parties.
- 5. I have X have not participated as a party, witness, or in any other capacity in any other litigation concerning custody of a child mentioned above, in this or any other state. (If affirmative, state name of each child, manner of participation, court, state and county (or district), case number, date of order or judgment, if any.)
- 6. I do X do not have any information of any custody proceeding concerning a child mentioned above pending in a court of this or any other state. (If affirmative, state name of each child, manner of participation, court, state and county (or district), case number, status of proceeding.)
- 7. I do X do not know of any person not a party to this proceeding who has physical custody or claims to have custody or visitation rights with respect to any child mentioned above. (If affirmative, state name and address of person, whether physical custody, claiming custody rights, or claiming visitation rights, name of child involved.)
- 8. Husband's mailing address is: 7014 E. Golf Links Rd. #202 Tucson AZ 85730-1064.
- 9. Wife's mailing address is: 305 Amistad San Angelo TX 76901.



 ROBERT STEWART FLORES

STATE OF ARIZONA)
)
 COUNTY OF PIMA)

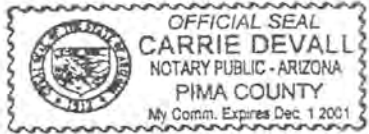
SUBSCRIBED and SWORN TO OR AFFIRMED before me this 17th day of February, 1999.



 NOTARY PUBLIC

My commission expires:

Attorney's Name, Address, Phone:
 Law Office of LYNN ELAINE SAUL, P.C.
 647 North Ninth Ave.
 Tucson AZ 85705
 (520) 882-6226
 Computer No. 40164



PCBA DR-04-02
 Revised: 12/93

M-0

FILED

99 FEB 18 AM 9:42

PATINIA A. HOLLAND
CLERK, SUPERIOR COURT
BY *[Signature]*
DEPUTY

Keith Ylvisaker

1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: LYNN ELAINE SAUL
8 State Bar # 3343
9 Pima County Comp. # 40164
10 Attorney for Respondent

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
8 IN AND FOR THE COUNTY OF PIMA

9 In Re the Marriage of)
10 TAMMY LYNN MAGILL, fka FLORES) No: D-112333
11 Petitioner,) VERIFIED PETITION FOR
12 and) ENFORCEMENT OF VISITATION
13 ROBERT STEWART FLORES,) AND CONTEMPT
14 Respondent.) (Unassigned)
15)

16 Respondent, ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
17 SAUL, hereby petitions this Court for enforcement of the existing
18 Joint Custody Parenting Plan in this matter, signed by both parties
19 and incorporated into the Decree of Dissolution dated August 11,
20 1997, as follows:
21

REC'D 02-18-99
CIB
REC'D
DOC 11
POST DECREE
CHECK
07.50
33
#000015
332600
30112333
\$1.00
\$61.00

22 1. The parties' Joint Custody Parenting Plan states that the
23 parties share joint care, custody and control of their children
24 with primary custody in Petitioner and reasonable visitation for
25 Respondent according to the terms of the Plan. The Plan states
26 that Respondent shall have visitation with the children for the
27 children's spring vacation from school.

28 2. On December 3, 1998, Respondent filed a Petition for an Order
to Show Cause to enforce his visitation rights for the Christmas

M-9

1 vacation after Petitioner failed to communicate with him until the
2 last minute and then refused to bring the children for the full
3 time of their vacation. After hearing on December 28, 1998, the
4 Court ordered that the Christmas vacation included all time off
5 from school.

6 3. The Minute Entry dated December 28, 1998 states, "Petitioner
7 is admonished to abide by the Parenting Plan. Any failure to
8 comply with the Court's orders, including failure to follow the
9 Joint Parenting Plan, could result in a finding of contempt of
10 court and in sanctions being imposed, up to and including
11 incarceration." The Minute Entry also states, "Petitioner is
12 further admonished that, should it be necessary for Respondent to
13 come back to court again to enforce his visitation rights,
14 attorney's fees shall be assessed against her."

15 4. In the first week of February, Petitioner sent a letter by
16 registered mail to Respondent stating that Petitioner intends to
17 bring the children on March 15, 1999 and to pick them up on March
18 19, 1999. The children's spring break actually begins on March 12,
19 1999, which they have off for Rodeo Day, and includes the weekend
20 days, through March 21, 1999.

21 5. Respondent's attorney mailed a letter to Respondent on
22 February 9, 1999, requesting that Petitioner contact Respondent or
23 his attorney and stating that these arrangements were not in
24 accordance with the parties' Joint Custody Parenting Plan and not
25 acceptable to Respondent. Petitioner has not contacted Respondent
26 or his attorney and does not return phone calls from Respondent.
27 WHEREFORE, Respondent requests this Court to issue an Order to Show
28 Cause directing Petitioner to appear and show cause, if any she

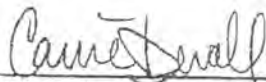
M-0

1 has, why the following relief should not be granted:

2 RELIEF REQUESTED BY RESPONDENT:

- 3 1. To hold an expedited Show Cause hearing on this Petition to
4 Enforce Visitation and Contempt.
- 5 2. To find Petitioner in contempt for failing to comply with the
6 terms of the Joint Custody Parenting Plan, signed by both parents
7 and incorporated into the Decree of Dissolution dated August 11,
8 1997, and to impose such sanctions as the Court may deem
9 appropriate, including sanctions to assure visitation.
- 10 3. To issue an Order that Petitioner shall deliver the children to
11 Tucson for visitation with Respondent by 7 p.m. on March 12, 1999,
12 and no later and that the children shall leave Tucson no earlier
13 than the morning of March 21, 1999, in accordance with the parties'
14 Joint Custody Parenting Plan.
- 15 4. To issue an Order that for future visits, Petitioner must
16 contact Respondent at least six weeks in advance so that the
17 parties can jointly arrange for mutually-agreeable travel dates and
18 times, in accordance with the Joint Custody Parenting Plan.
- 19 5. That the Court order Petitioner to pay Respondent's attorneys
20 fees and costs of this action.
- 21 6. For such other relief as may be just and reasonable.

22 DATED this 17th day of February 1999.

23
24
25 
26 _____
27 LYNN ELAINE SAUL
28 Attorney for Respondent

M-0

* VERIFICATION *

STATE OF ARIZONA)
COUNTY OF PIMA)

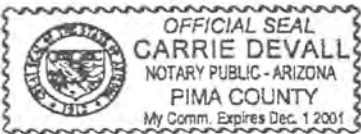
ROBERT STEWART FLORES hereby swears or affirms that he is the Respondent in this matter, and that the contents of this Petition for Enforcement of Visitation are true and correct to the best of his knowledge, information and belief.

Robert Flores
ROBERT STEWART FLORES

SUBSCRIBED and SWORN TO OR AFFIRMED before me this 17th day of February, 1999.

Carrie Devall
NOTARY PUBLIC

My commission expires:



M-0

Office of
CLERK OF SUPERIOR COURT, PIMA COUNTY
TUCSON, ARIZONA

CIV No 332600

DATE: 2/18/99

Received from: Gand

Amount Received: 61.00 Case No. D 112333

Caption: Masini v Flores

Cash Check Money Order Credit Card

- | | | | |
|--|---|---|--|
| New Civil <input type="checkbox"/> | Appearance Fee <input type="checkbox"/> | Passport <input type="checkbox"/> | Patricia A. Noland, Clerk |
| New Dissolution <input type="checkbox"/> | Appeal Fee <input type="checkbox"/> | Marriage License <input type="checkbox"/> | |
| New Annulment <input type="checkbox"/> | Cash Bond <input type="checkbox"/> | Notary <input type="checkbox"/> | |
| New SP <input type="checkbox"/> | Writ/Subpoena <input type="checkbox"/> | Process Server <input type="checkbox"/> | |
| New Domestic <input type="checkbox"/> | Jury Fees <input type="checkbox"/> | Photocopies <input type="checkbox"/> | |
| New T Case <input type="checkbox"/> | Post Judgment <input checked="" type="checkbox"/> | Search Fee <input type="checkbox"/> | |
| Change Venue <input type="checkbox"/> | Transmittal <input type="checkbox"/> | Misc. <input type="checkbox"/> | By: <u>[Signature]</u>
Deputy Clerk |

Reso MI [Signature] Deputy Clerk

Office of
CLERK OF SUPERIOR COURT, PIMA COUNTY
TUCSON, ARIZONA

CIV No 333912

DATE: 2-22-98

Received from: EZ FOR LYNN E. SAUL

Amount Received: 61.00

REG 82-02-99 08729
Case No. D112333 309
CIV 1 #100029

Caption: T. MAGILL / R. FLORES

Cash Check Money Order Credit Card

REC# 333912
DOC# 30112333
Patricia M. Inland, Clerk \$61.00
~~XXXXXXXXXXXXXXXXXXXX~~

- | | | |
|-----------------|----------------|------------------|
| New Civil | Appearance Fee | Passport |
| New Dissolution | Appeal Fee | Marriage License |
| New Annulment | Cash Bond | Notary |
| New SP | Writ/Subpoena | Process Server |
| New Domestic | Jury Fees | Photocopies |
| New T Case | Post Judgment | Search Fee |
| Change Venue | Transmittal | Misc. |
| | | Postage |

M-E

By: Robert L. Brown
Deputy Clerk

Robert L. Brown - 29

FILED

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

99 FEB 22 PM 4:57

IN AND FOR THE COUNTY OF PIMA

PATRICIA A. NOLAND

In re the Marriage of CLERK, SUPERIOR COURT

BY Robert L. Brown

No: D-112333

TAMMY LYNN MAGILL, fka FLORES)

Petitioner,)

and)

ROBERT STEWART FLORES)

Respondent.)

REQUEST FOR ORDER TO SHOW CAUSE HEARING DATE

IT IS HEREBY requested that the Order to Show Cause filed with the clerk of Court on February 18, 1999 be set for hearing.

I. Type of Order to Show Cause:

- Pre-Judgment
- Post-Judgment
- Other
- Provisional Remedy
- Supplemental Proceedings

II. Previous matters were heard by Commissioner Karen Nygaard.

III. Estimated time for hearing: 1/2 Hour(s)

IV. Court reporter required? Yes No

V. Relief Sought:

- Contempt
- Injunction
- Special Action
- Appoint Receiver
- Wage Assignment
- Possession
- Temporary Restraining Order Modification
- { } Child Support
- { } Spousal Maintenance
- {X} Visitation- Enforcement
- { } Other:

VI. The opposing party is represented by: TAMMY LYNN, 305 Amistad, San Antonio, TX 76901 is no longer represented by counsel.

Attorney's Name, Address, Phone
LYNN ELAINE SAUL
LAW OFFICE OF LYNN ELAINE SAUL, P.C.
647 North Ninth Ave.
Tucson AZ 85705
Computer No. 40164

Carrie Swall
Attorney for Respondent

PCRA 18-13
REVISED: 12/92

M-0

FILED

99 FEB 22 PM 4:55

PATRICIA W. HANCOCK
CLERK, SUPERIOR COURT
BY Robert L. Brown
DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: LYNN ELAINE SAUL
8 State Bar # 3343
9 Pima County Comp. # 40164
10 Attorney for Respondent

11 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

12 IN AND FOR THE COUNTY OF PIMA

13 In re the Marriage of)
14 TAMMY LYNN MAGILL, fka FLORES,)
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28)
Petitioner,
and
ROBERT STEWART FLORES,
Respondent.

No: D-112333

MOTION and ORDER TO
SHORTEN TIME FOR HEARING
AND TO CONSOLIDATE
HEARING WITH HEARING ON
MODIFICATION OF CHILD
SUPPORT

Respondent, ROBERT STEWART FLORES, by his attorney, LYNN ELAINE SAUL, hereby respectfully requests this Court to shorten the time for hearing on Respondent's Order to Show Cause Re: Enforcement of Visitation and Contempt, for the reason that the visitation to be enforced is scheduled for March 19, 1999. Respondent further requests that, in the interest of judicial economy and to save time and expense for the parties, the Court consolidate the hearing of this matter with the hearing in this case on modification of support currently scheduled for February 26, 1999 at 11 a.m.

DATED this 17th day of February, 1999.

Lynn Elaine Saul
LYNN ELAINE SAUL
Attorney for Respondent



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D 112333

ORDER

UPON READING the foregoing Motion to Shorten Time for Hearing and to Consolidate Hearing with Hearing on Modification of Child Support and good cause appearing therefor,

IT IS ORDERED that the Motion to Shorten Time for Hearing is granted, and that the hearing on Respondent's Order to Show Cause Re: Enforcement of Visitation and Contempt be scheduled for March 1, 1999 at 9:30 (am/pm), Pima County Superior Court, 110 West Congress, Tucson AZ. *SRM*

DATED this ^{19th} ~~18th~~ day of February 1999.

JUDGE/COMMISSIONER

Copy served this 17th day of February, 1999 on:
TAMMY LYNN MAGILL
305 Amistad
San Angelo, TX 76901
Petitioner



5803

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M-0

FILED

99 FEB 22 PM 4:56

PAUL SWITLAND
CLERK, SUPERIOR COURT
BY Robert L. Brown
DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: LYNN ELAINE SAUL
8 State Bar # 3343
9 Pima County Comp. # 40164
10 Attorney for Respondent

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
8 IN AND FOR THE COUNTY OF PIMA

9	In re the Marriage of)	
10	TAMMY LYNN MAGILL, nka FLORES,)	No: D-112333
11	Petitioner,)	
12	and)	ORDER TO SHOW CAUSE
13	ROBERT STEWART FLORES)	RE: ENFORCEMENT OF
14	Respondent.)	VISITATION AND CONTEMPT
15	_____)	

16 Upon reading Respondent's Petition for Enforcement of Visitation
17 and Contempt and good cause appearing,

18 IT IS ORDERED that Petitioner shall appear before this Court at the
19 time and place shown, to show cause, if any there be, why the
20 relief requested by Respondent should not be granted.

21 TIME AND PLACE OF HEARING:

22 DATE: March 1, 1999
 23 TIME: 9:30 (am/pm)
 24 PLACE: Pima County Superior Court
 25 110 West Congress
 26 Tucson AZ 85701
 27 Division TBA
 28



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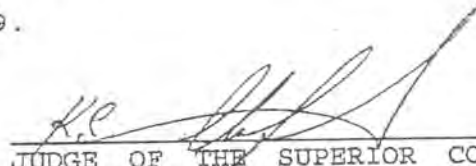
D112333

1 RELIEF REQUESTED BY RESPONDENT:

- 2 1. To hold an expedited Show Cause hearing on this Petition to
3 Enforce Visitation and Contempt.
4 2. To find Petitioner in contempt for failing to comply with the
5 terms of the Joint Custody Parenting Plan, signed by both parents
6 and incorporated into the Decree of Dissolution dated August 11,
7 1997, and to impose such sanctions as the Court may deem
8 appropriate, including sanctions to assure visitation.
9 3. To issue an Order that Petitioner shall deliver the children to
10 Tucson for visitation with Respondent by 7 p.m. on March 12, 1999,
11 and no later and that the children shall leave Tucson no earlier
12 than the morning of March 21, 1999, in accordance with the parties'
13 Joint Custody Parenting Plan.
14 4. To issue an Order that for future visits, Petitioner must
15 contact Respondent at least six weeks in advance so that the
16 parties can jointly arrange for mutually-agreeable travel dates and
17 times, in accordance with the Joint Custody Parenting Plan.
18 5. That the Court order Petitioner to pay Respondent's attorneys
19 fees and costs of this action.
20 6. For such other relief as may be just and reasonable.

21 DATED this day of February, 1999.

22
23
24
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28
1999
19th


JUDGE OF THE SUPERIOR COURT

Estimated time: One half hour.



5803 594

EZ MESSENGER

Office of
CLERK OF SUPERIOR COURT, PIMA COUNTY
TUCSON, ARIZONA

CIV No 333973

DATE: 2-25-99

647 NORTH NINTH AVENUE
TUCSON AZ 85705

REFUND TO:

Received from: LYNN ELAINE SAUL, P.C.

Amount Received: REFUNDED 101.00

Case No. D112333

Caption: TAMMY L. FLORES VS. ROBERT S. FLORES

Cash Check Money Order Credit Card

Patricia A. Noland, Clerk

New Civil _____
New Dissolution _____
New Annulment _____
New SF _____
New Domestic _____
New T Case _____
Change Venue _____

Appearance Fee _____
Appeal Fee _____
Cash Bond _____
Writ/Subpoena _____
Jury Fees _____
Post Judgment _____
Transmittal _____

Passport _____
Marriage License _____
Notary _____
Process Server _____
Photocopies _____
Search Fee _____
Misc. REFUND _____
Postage _____

INFO

BY: Robert L. Brown
Deputy Clerk
Robert L. Brown - 29

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

99 FEB 26 PM 8:30

ARIZONA SUPERIOR COURT, PIMA COUNTY

BY: V. ARMY, DEPUTY

NOTIFICATION DATE: 2/25/1999 CASE NUMBER: D-112333

PETITIONER: FLORES, TAMMY LYNN
RESPONDENT: FLORES, ROBERT STEWART

TYPE: Domestic OSC-Post
EVENT: Modify - Jgmt/Order/Minute Entry

DATE: 2/26/1999 TIME: 11:00 AM

PURSUANT TO THE TELEPHONIC REQUEST MADE ON 2/25/1999
BY Jean Moscow,

- PETITIONER
- PETITIONER'S ATTORNEY
- RESPONDENT
- RESPONDENT'S ATTORNEY

THE FOREGOING EVENT WAS VACATED DUE TO

- LACK OF SERVICE
- SETTLED
- STIPULATION FORTHCOMING
- LACK OF CONFIRMATION
- OTHER REASON

CC: NOTICE TO FILE ONLY

BY: /s/ Teresa Anagnostos

M-0

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

99 MAR -1 PM 7:21

BY: V. ARMY, DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: LYNN ELAINE SAUL
8 State Bar # 3343
9 Pima County Comp. # 40164
10 Attorney for Respondent

11 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

12 IN AND FOR THE COUNTY OF PIMA

13	In re the Marriage of)	
14	TAMMY LYNN MAGILL, fka FLORES)	No: D-112333
15	Petitioner,)	
16	and)	AFFIDAVIT OF SERVICE BY
17)	MAIL
18	ROBERT STEWART FLORES,)	(UNASSIGNED)
19	Respondent.)	

20 Respondent ROBERT STEWART FLORES, by his attorney LYNN ELAINE SAUL,
21 hereby files this Affidavit of Service by Mail pursuant to Rule 4.2
22 of the Arizona Rules of Civil Procedure:

23 I. The undersigned attorney for Respondent deposited the following
24 documents in the Post Office, postage pre-paid to be sent to
25 Petitioner by certified mail requiring a signed a returned receipt,
26 on 2/23/99: Order to Show Cause, Request for O.S.C. Hearing Date,
27 Motion to Shorten Time, Petition for Enforcement of Visitation and
28 Contempt, Affidavit re: Minor Children.

II. Petitioner is known to be located outside the State of
Arizona, specifically San Angelo, Texas.

III. The copies of Pleadings set forth in paragraph 1 were
dispatched to Petitioner.

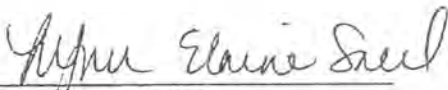
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M-K

1 IV. The copies of Pleadings set forth in paragraph 1 were in fact
2 received by Petitioner as evidenced by the receipt attached hereto
3 as exhibit A and part hereof.

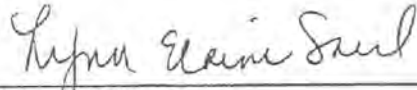
4 V. Petitioner received the Summons and other pleadings as set
5 forth in paragraph 1 on February, 26, 1999 and the receipt was
6 returned to the undersigned attorney on March 1, 1999.

7 DATED this March 1, 1999.

8 
9 _____
10 LYNN ELAINE SAUL
Attorney for Respondent

11 STATE OF ARIZONA)
12 COUNTY OF PIMA)

13 LYNN ELAINE SAUL hereby swears or affirms that she is the Attorney
14 for Respondent in this matter, and that the contents of this
15 Affidavit of Service are true and correct to the best of her
16 knowledge, information and belief.

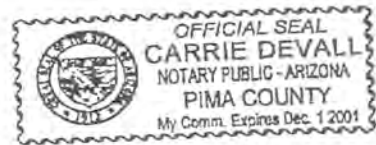
17 
18 _____
19 LYNN ELAINE SAUL

20 SUBSCRIBED and SWORN TO OR AFFIRMED before me this 1st day of
21 March, 1999.

22 
23 _____
24 NOTARY PUBLIC

25 My commission expires:

26 Copy mailed this 1 day
27 of March, 1999 to
28 JEAN MOSKOW
Butler & Stein, P.C.
110 S. Church Ave., #9300
Tucson, AZ 85701-1608
Attorney for Petitioner



M-K

Exhibit "A"

D112333

Is your RETURN ADDRESS completed on the reverse side?	SENDER:	I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input checked="" type="checkbox"/> Restricted Delivery Consult postmaster for fee.
	■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.	
3. Article Addressed to: Tammy Lynn Magill 305 Amistad San Angelo TX 76901		4a. Article Number 7 556 433 752
5. Received By: (Print Name) 6. Signature: (Addressee or Agent) x Tammy Magill		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
		7. Date of Delivery 2-26-99
		8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.



FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

99 MAR -1 PM 6:45

BY: V. ARMY, DEPUTY

1 Jean Moskow, Esq.
2 BUTLER & STEIN, P.C.
3 110 South Church Ave.
4 Suite 9300
5 Tucson, Arizona 85701
6 (520) 628-1618
7 Pima County Computer No. 64512

8 Attorney for Petitioner

9 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

10 IN AND FOR THE COUNTY OF PIMA

11 In re the Marriage of:)

No. D-112333

12 TAMMY LYNN FLORES)
13 (nka: Tammy Lynn Magill),)

STIPULATION AND ORDER
CONTINUE OSC HEARING
ON MODIFICATION OF CHILD
SUPPORT

14 Petitioner,)

15 vs.)

16 ROBERT STEWART FLORES,)

Unassigned

17 Respondent.)

**CONFIRMATION DUE
PURSUANT TO LOCAL RULE 8.3(E)-**

18 The above captioned parties, through their undersigned
19 attorneys, hereby stipulate to continue the OSC hearing on
20 modification of child support currently scheduled to be heard
21 in this matter on February 26, 1999 at 11:00 a.m. until March
22 15, 1999 or as soon thereafter as is convenient for the Court
23 in order that the parties may attempt to reach a settlement on
24 the issues in dispute.

25 RESPECTFULLY SUBMITTED this 24th day of February 1999.

26 BUTLER & STEIN, P.C.

27 Jean Moskow
28 Jean Moskow
Attorney for Petitioner

Carrie Devall
Lynn Elaine Saul
Attorney for Respondent

(R)

M-K

5808 705

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1010

D112333


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In re the Marriage of:
Tammy Lynn Flores and Robert Stewart Flores
Pima County Superior Court Case No. D-112333
Stipulation and Order

ORDER

UPON STIPULATION and good cause appearing,
IT IS ORDERED that the hearing on modification of child
support currently scheduled to be heard in the above captioned
matter on February 26, 1999 at 11:00 a.m. is hereby continued
to March 16, 1999 at 11:00 a.m. *JKM*

DATED this 26th day of Feb, 1999.



JUDGE/COMMISSIONER/JUDGE PRO TEM
PIMA COUNTY SUPERIOR COURT

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

M-K



FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

99 MAR 16 PM 7:49

BY: V. ARMY, DEPUTY

1 Law Office of
LYNN ELAINE SAUL, P.C.

2 647 N. Ninth Avenue
Tucson AZ 85705

3 (520) 882-6226

4 Fax (520) 882-7678

By: LYNN ELAINE SAUL

State Bar # 3343

Pima County Comp. # 40164

Attorney for Respondent

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

7 IN AND FOR THE COUNTY OF PIMA

9 In re the Marriage of:

10 TAMMY LYNN FLORES, nka MAGILL

11 Petitioner,

12 and

13 ROBERT STEWART FLORES

14 Respondent.

) No: D-112333

) AFFIDAVIT OF ATTORNEY'S
) FEES

15 Pursuant to the Minute Entry Order of March 9, 1999 and the
16 requirements of Schweiger V. China Doll Resturant, Inc., 138 Ariz.
17 183, 673 P. 927 (app. 1983), LYNN ELAINE SAUL, Attorney for
18 Respondent ROBERT STEWART FLORES hereby submits her affidavit of
19 attorney's fees and costs incurred by Respondent in this visitation
20 enforcement matter. Attorney's services were performed by LYNN
21 ELAINE SAUL and by CARRIE DEVALL of the firm of LAW OFFICE OF LYNN
22 ELAINE SAUL, PC.

23 DATE AND DESCRIPTION

TIME

FEES

24	<u>2/08/99</u>	Phone call, client re: spring visit	CD	<u>0.10</u>	<u>12.50</u>
25	<u>2/09/99</u>	Letter to Tammy Lynn Magill re: spring Visit	CD	<u>0.50</u>	<u>62.50</u>
26	<u>2/16/99</u>	Phone call, client re: spring visit	CD	<u>0.10</u>	<u>12.50</u>
27	<u>2/16/99</u>	Prep. Pleadings, Petn for Enforcement Of Visitation	CD	<u>0.50</u>	<u>62.50</u>
	<u>2/17/99</u>	Prep. Pleadings, confd.	CD	<u>0.25</u>	<u>31.25</u>
28	<u>2/10/99</u>	Court filing and request for OSC date			

M-K

1		(Done personally to combine With existing hearing date)	CD	0.20	25.00
2	<u>2/22/99</u>	Phone call w/ EZ re: hearing date	CD	0.10	12.50
3		Subtotal--pre-attorney for Petnr		<u>1.75</u>	<u>218.75</u>
4	<u>2/24/99</u>	Phone call with Jean Moskow	LES	0.33	61.05
5	<u>2/24/99</u>	Correspondence w/ documents to Jean Moskow; Stipulation to Continue	CD	0.20	25.00
6	<u>3/03/99</u>	Telephone call w/ opposing Atty. Jean Moskow	CD	0.20	25.00
7	<u>3/05/99</u>	Telephone call w/ opposing Atty. Jean Moskow	LES	0.10	18.50
8	<u>3/08/99</u>	Conference with client re: preparation For Visitation hearing	CD	0.10	12.50
9	<u>3/08/99</u>	Telephone call w/ opposing Atty. Jean Moskow	CD	0.10	12.50
10	<u>3/09/99</u>	Court appearance, hearing on Visitation	LES	0.50	92.50
11					
12		Subtotal--after attorney for Petnr		<u>1.53</u>	<u>247.05</u>
13					
14		TOTAL FEES TO DATE		3.28 hrs \$	465.80
15		COSTS:			
16	<u>2/17/99</u>	Clerk. Filing fee re: Spring Visitation			61.00
17	<u>2/23/99</u>	Postage, cert. Mail service Re: spring visit			8.60
18		TOTAL COURT COSTS			<u>69.60</u>
19					

20 As requested by the Court, this affidavit of attorney's fees
21 is divided into two sections: fees incurred prior to February 24,
22 1999, when Petitioner's attorney, JEAN MOSKOW, became involved in
23 attempting to negotiate a resolution of the visitation matter, and
24 fees incurred after said attorney's involvement in the case.

25 A copy of Respondent's attorney's February 9, 1999 letter to
26 Petitioner is attached hereto as Exhibit A and made part hereof.
27 This letter explained to Petitioner that the Court's admonitions
28 concerning calculation of visitation time at the December 28, 1998

M-K

1 hearing applied to the spring visit as well, and invited Petitioner
2 to resolve this matter by discussing it with Respondent or with the
3 undersigned attorney's office.

4 Petitioner made no attempt to resolve the matter until Ms.
5 Moskow became involved on February 24, 1999.

6
7 Lynn Elaine Saul
8 LYNN ELAINE SAUL,
Attorney for Respondent

9 STATE OF ARIZONA)
10 COUNTY OF PIMA)

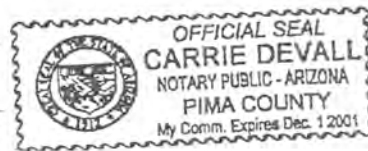
11 SUBSCRIBED and SWORN TO OR AFFIRMED before me this 16th day of
12 March, 1999.

13
14 Carrie Devall
NOTARY PUBLIC

15 My commission expires:

16 Copy mailed this 16th day of
17 March, 1999 to:

18 Jean Moskow
19 Butler & Stein, PC
100 S. Church Avenue, #9300
Tucson AZ 85701-1608
20 Attorney for Respondent



21
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M-K

0112333

Law Office of LYNN ELAINE SAUL, P.C.
647 North Ninth Avenue
Tucson Arizona 85705

at historic Jim's Market

LYNN ELAINE SAUL
CARRIE DEVALL

(520) 882-6226
Fax (520) 882-7678

February 9, 1999

Tammy Lynn Magill
305 Amistad
San Angelo TX 76901

Re: Divorce

Dear Ms. Magill:

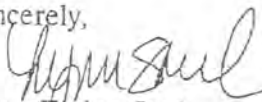
I represent Robert Flores. He received a registered letter from you stating that you intended to bring your children on March 15, 1999 and pick them up on March 19, 1999 for their spring break.

This is not acceptable. Your Joint Custody Parenting Plan states that Robert shall have the children for their spring vacation from school. A vacation includes weekends and any other time off related to the vacation period. The children's school schedule indicates that they have Rodeo Day off on March 12, 1999, so the spring visit should commence on March 12 and end on March 21.

After the last hearing regarding visitation on December 28, 1998, the Court stated in its Minute Entry that the Christmas vacation "includes all the time off from school which is contiguous to Christmas vacation." The Court further admonished you to abide by the Parenting Plan and ordered that if Robert has to come back to court to enforce his visitation rights, you will be ordered to pay his attorney's fees and could face sanctions for contempt of court. A copy of the Minute Entry is enclosed for you.

Please make arrangements immediately to bring the children for the full visit, from March 12 through March 21, 1999 and give notice of your arrangements to Robert or to my office. If you do not, we will be forced to go back to court to enforce the full visitation and will seek sanctions for contempt as well as reimbursement for all attorney's of Robert's fees and costs.

Sincerely,


Lynn Elaine Saul
Attorney at Law

cc: Robert Stewart Flores

M-K

EXHIBIT A

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

99 MAR 16 PM 7:48

BY: V. ARMY, DEPUTY

1 | Law Office of
2 | LYNN ELAINE SAUL, P.C.
3 | 100 N. Stone Avenue, Suite 602
4 | Tucson AZ 85701
5 | (520) 882-6226
6 | Fax (520) 882-7678
7 | By: LYNN ELAINE SAUL
8 | State Bar # 3343
9 | Pima County Comp. # 40164
10 | Attorney for Respondent

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

9 | In re the Marriage of
10 | TAMMY LYNN MAGILL (fka FLORES),
11 | Petitioner,
12 | and
13 | ROBERT STEWART FLORES,
14 | Respondent.

)
)
) No. D-112333
)
) STIPULATION and ORDER TO
) CONTINUE
)
) (Unassigned)
)
)

**CONFIRMATION DUE
PURSUANT TO LOCAL RULE 8.3(E)-**

A

15 | _____
16 | Respondent, by his attorney LYNN ELAINE SAUL, and Petitioner, by
17 | her attorney, JEAN MOSKOW, hereby stipulate to continue the hearing
18 | on Respondent's Order to Show Cause for Modification of Child
19 | Support set in this matter on March 16, 1999 at 11 a.m. for
20 | approximately two weeks but not on March 31, 1999 or April 1, 1999
21 | for the reason that the parties can continue to try to settle this
22 | matter.

24 | Jean Moskow by Lynn Saul
25 | JEAN MOSKOW *with electronic permission*
26 | Attorney for Petitioner

LYNN ELAINE SAUL
Attorney for Respondent

28 | M-K

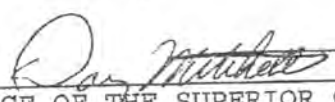
D112333

ORDER

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ON STIPULATION OF COUNSEL, and good cause appearing,
IT IS ORDERED that the hearing on Respondent's Order to Show Cause
for Modification of Child Support set in this matter on March 16,
1999 at 11 a.m. be continued to the 5 day of April,
1999 at 10 (AM/PM) in a division to be assigned. *SPH*

3-12-99



JUDGE OF THE SUPERIOR COURT/COURT COMMISSIONER

cc: Court Administrator

M-K

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

99 MAR 18 PM 2:10

3-18-99

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE PRO TEMPORE: HON. K.C. STANFORD
BY: H. MULHOLLAND, DEPUTY

CASE NO. D-112333

COURT REPORTER: NONE

DATE: March 9, 1999

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES, NKA. MC GILL
PETITIONER

Jean Moskow
Petitioner's Attorney

AND

ROBERT STEWART FLORES
RESPONDENT

Lynn Elaine Saul
Respondent's Attorney

MINUTE ENTRY

RESPONDENT'S ORDER TO SHOW CAUSE RE PETITION FOR ENFORCEMENT OF
VISITATION AND CONTEMPT, FILED FEBRUARY 22, 1999, POST DECREE:

Both parties are present.

IT IS ORDERED the file label and caption be amended to reflect the petitioner's complete name
as Tammy Lynn Flores, nka. Mc Gill.

Counsel make opening statements to the Court.

Upon stipulation of the parties, the Court enters the following clarification as to Spring Break
and Christmas visitation:

IT IS ORDERED, regarding visitation with respect to Spring Break and with respect to
Christmas visitation, that contiguous periods of non-school time are included within the period of
visitation.

Tammy Lynn Flores, nka. Mc Gill, is sworn and questioned by the Court.

Robert Stewart Flores is sworn and questioned by the Court.

THE COURT ENTERS THE FOLLOWING FINDINGS AND ORDERS:

Renee McGuire
Deputy Clerk

M-K

MINUTE ENTRY

Page: 2

Date: March 9, 1999

Case No: D-112333

THAT the minor children shall be delivered by the petitioner to the respondent on Friday evening, March 12, 1999, that the exchange for return with petitioner to Texas shall be noon Saturday, March 20, 1999.

THAT THE COURT APPROVES such an exchange because the available time for travel between Tucson and San Angelo, Texas is one and one-half hours (the location is south west of Midland Odessa, Texas) for 14 hours and runs approximately from 6 to 8 on day travel, including stops and lunch.

THAT THE COURT APPROVES such plans because it provides a day for travel and a day for rest before school begins.

IT IS ORDERED that petitioner shall mail or fax to the respondent a full and complete copy of the school calendar for the minor children no later than August 15, 1999, and August 15 of each month thereafter.

THE COURT DOES NOT FIND petitioner in contempt of court for interference with visitation; however, the Court will consider attorney's fees.

IT IS ORDERED that Ms. Saul may file a China Doll Affidavit and Memorandum within ten days of this date; Ms. Moskow shall file any response within five days; upon receipt thereof,

THE COURT shall take the matter UNDER ADVISEMENT on March 25, 1999,

Ms. Saul orally moves for a protective order as to deposition.

Counsel argue to the Court.

IT IS ORDERED Ms. Saul's oral motion for protective order is granted in part, in that the respondent is not required to disclose his fiancée's paystub.


HON. K.C. STANFORD

Renee McGuire
Deputy Clerk

M-K

MINUTE ENTRY

Page: 3

Date: March 9, 1999

Case No: D-112333

cc:

Hon. K.C. Stanford

Domestic Calendaring

Jean Moskow, Esq.

Lynn Elaine Saul, Esq.

Under Advisement Clerk

M-K

Renee McGuire
Deputy Clerk

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

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Jean Moskow, Esq.
BUTLER & STEIN, P.C.
110 South Church Ave.
Suite 9300
Tucson, Arizona 85701
(520) 628-1618
Pima County Computer No. 64512

Attorney for Petitioner

FILED

92 MAR 29 PM 6:57

3-29-99

BY: V. ARMY, DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

In re the Marriage of:)	
TAMMY LYNN FLORES)	No. D-112333
(nka: Tammy Lynn Magill),)	
Petitioner,)	PETITIONER'S RESPONSE
)	TO THE AFFIDAVIT OF
vs.)	ATTORNEY'S FEES
ROBERT STEWART FLORES,)	
Respondent.)	Unassigned

TAMMY LYNN MAGILL ("Petitioner"), through her undersigned attorney, hereby responds to the Affidavit of Attorney's Fees filed by counsel for ROBERT STEWART FLORES ("Respondent") on or about March 16, 1999. Petitioner files this response in conformance with this Court's March 9, 1999 Minute Entry allowing Respondent 5 days within which to do so.¹ Petitioner does not dispute that the time allotted for the services rendered to Respondent; however, it is Petitioner's position that she should not be ordered to pay such fees since she acted at all times in good faith.

More specifically, it is Petitioner's position that the December 28, 1998 Minute Entry

¹ The Court is advised that the March 9, 1999 Minute Entry did not reach Ms. Moskow's office until March 26, 1999. Prior to that time it was Ms. Moskow's understanding that she would have 5 days from the date of receipt of Ms. Saul's Affidavit within which to respond as ordered by the Court, which would have made Ms. Moskow's response due March 29, 1999

ML

1 upon which Respondent bases his claim for attorney's fees is ambiguous in that it does not
2 specifically state that all visitation periods include weekends. Further, once Petitioner was
3 informed by undersigned counsel that the aforesaid Order would be construed to include all
4 weekends, she immediately authorized that the matter be settled and that settlement terms be
5 offered that included both the weekend prior to the proposed visitation and the weekend
6 thereafter. For his part, Respondent rejected the settlement offer, which rejection resulted in
7 the March 9, 1999 hearing. Further, Petitioner's delay in retaining counsel for this matter is a
8 result of circumstances beyond her control. Petitioner had already retained a Texas attorney,
9 Kathy Womack, to intercede on her behalf with Respondent; however, Ms. Womack and the
10 undersigned did not speak until February 22, 1999. Finally, the parties themselves have had
11 communication difficulties since prior to their divorce, and Petitioner was reluctant to call
12 Respondent and too intimidated to call his counsel.

15 Petitioner's financial condition also militates against an award of attorney's fees for
16 Respondent. Petitioner is currently unemployed and receiving only \$400 per month in child
17 support from Respondent. Respondent, on the other hand, has had the luxury of returning to
18 school and is currently seeking a reduction in child support to \$277 per month. Petitioner is
19 also responsible for all visitation related transportation costs. For the Spring break round trip
20 to Tucson Petitioner's expense amounted to \$243.48. (See receipts for said trip attached
21 hereto as Exhibit 1.) In addition to these expenses, Petitioner has also suffered financially
22 because of Respondent's determination to take this matter before the Court (See Petitioner's
23 Statement of Attorney's Fees, attached hereto as Exhibit 2.)

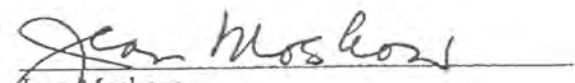
26 Petitioner requests that this Court deny Respondent's request for reimbursement of
27 attorney's fees given Petitioner's lack of bad faith and financial status.
28

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RESPECTFULLY SUBMITTED this 29 day of March, 1999.

BUTLER & STEIN, P.C.


Jean Moskow
Attorney for Petitioner

COPY of the foregoing mailed
this 29 day of March, 1999, to:

Lynn Saul, Esq.
647 N. Ninth Avenue
Tucson, AZ 85705-0000
Attorney for Respondent

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 1300
TUCSON, ARIZONA 85701
(520) 628-1618

MI

0112333

March 29, 1999

Tammy Magill
305 Amistad
San Angelo, TX 76901

Re: Post Decree Matters

STATEMENT

02/22/99	JM	Telephone conference with K. Womack	.35
02/24/99	JM	Telephone conference with opposing counsel; Prepare and finalize Motion to Continue; Telephone conference with client	.75
03/03/99	JM	Telephone conference with opposing counsel	.35
03/05/99	JM	Telephone conference with opposing counsel;	.25
03/08/99	JM	Telephone conference with opposing counsel; Review Court file; Telephone conference with client	.75
	PL	Telephone conference with Commissioner Stanford's secretary re: client appearing tele- phonically at hearing	.25
03/09/99	JM	Telephone conference with client (x2); Prepare for and attend Hearing on visitation	1.50

1.50
4.20 hours

3.95 @ \$165.00 per hour with Jean Moskow	=	\$651.75
.25 @ \$ 65.00 per hour with legal assistant	=	\$ 16.25
		<u>\$668.00</u>

MI

CLARION HOTEL RANDOLPH PARK
102 N ALVERNON WAY
TUCSON, AZ 85711

Account: 125061
Arrival: 3/12/99
Departure: 3/13/99
Rate: 84.00
Room: 354

KEY, CHARLOTTE
305 AMISTAD
SAN ANGELO, TX 76901

DATE	DESCRIPTION	COMMENT	CHARGE/PAYMENT
3/12/99	RM	ROOM CHARGE	#354 KEY, CHARLOTTE \$84.00
3/12/99	T1	SALES TAX	SALES TAX \$7.98
3/12/99	T3	OCCUPANCY TAX	OCCUPANCY TAX \$1.00
BALANCE DUE:			<u>92.98</u>

0981200462
CLARION RANDOLPH PARK
102 N. ALVERNON WAY
TUCSON, AZ. 85711
528-795-83330

MERCHANT 8100 300981200462 001
MARCH 13, 1999 10:36AM

BATCH # : 067 REF # : 014
ACCOUNT # : 5424100018389921
TYPE : MASTERCARD 10/99
AUTH # : 915208
FDLIC # : 000954
ROOM # : 0354
PC=8 MCCH6N6PM0312 3687

CHECK-OUT \$ 92.98

MI



6635 E. GRANT ROAD
TUCSON, AZ 85715
(602) 886-6635

YOUR SERVER WAS: LOUISE

=====
Chk #1274-1 03/12/99 18:57
=====

Check Subtotal 25.11
Tax 1.76
Check Total 26.87

Tendered:
CHARGE TIP 2.00
MASTERCARD 28.87
C KEY
ACCT: 5424180018389921
EXP. DATE: 10/99
AUTH. CODE: 881567
SERVER: 47

MESILLA VALLEY EXXON 759-511849-8
825 AVE DE MESILLA LAS CRUCES NH 88885
Credit Sale

CHARLETTE S KEY MASTERCARD
5424180018389921 Expires 10/99
03.14/99 17:06 Auth 881858 Tk# 871029
REG 3/0a 13.28460 \$8.999 \$13.27

Tax 8.88
Total \$13.27

food -
dinner
after we
got to
Tucson -
before we
took the
kids to Bob's.

gas

MI

Cracker Barrel Store #253
 Las Cruces, NM
 889093 DESIREE G 1

2 1 4 /1 4 4 8 9 GST 2
 MAR14'99 3:36PM

1 ICED TEA	0.99	-
1 ICED TEA	0.99	-
1 FF CFT 3VEG SPICY BUFFALO	7.99	-
1 FF CFS 204716	8.29	-
1 CRRS VASE 119611	5.99	-
1 MUSTARD 218800	1.89	-
1 BQ RS T BX 218800	5.99	-
1 BQ RS T BX	5.99	-
Subtotal	38.12	
Tip	2.00	-
Tax	2.43	
Total	42.55	
Charged Tip \$	2.00	
5424180018389921	10/99	
MASTER CARD	42.55	

---25438 CLOSED MAR14 4:44PM---

Thank You
 Please Come Back

*lunch -
 on the way
 back. We
 got a few
 extras -
 The items
 marked are
 for dinner
 only.*

19.98

ME

1
 STORE
 GARDEN CITY, TX
 001-0050049-01 FRANKLIN 30H BAR
 827 152 81 03 GARDEN CITY TX

Descr	Qty	Amount
CUSTOMER COPY		
T TAXABLE	1	0.59
T DAILY	1	0.49
T DELT	1	2.98
T TAXABLE	1	0.99
NON TAXABLE	1	0.99
T SOFT DRINKS	1	0.59

Sub Total 7.13
 Tax 0.38

TOTAL 7.51

CREDIT \$ 7.51

CARD TYPE: MASTERCARD
 CARD NAME: KEY/CHARLETTE B
 ACCT NUMBER: 5424180018389921
 EXP. DATE: 10/99 TRANS TYPE: SALE
 AUTH# 924249 REFERENCE#: 9500090876

THANK YOU

Please Come Again

REC# 0002 TRN# 001 TRN# 4811
 03/12/99 07:00:15 ST# 5049

breakfast-
 snacks

APPLEBEE'S
 NEIGHBORHOOD GRILL & BAR
 7956 Gateway East
 El Paso, Texas 79925
 (915) 598 - 7006

USER: JEANETTE T MASTERCARD
 DATE: 03-12-99 TIME: 13:12 CTRL: 37274

KEY/CHARLETTE B
 CARD NUMBER: 5424180018389921
 EXP DATE: 10.99
 APPROVAL CODE: 602709

AMOUNT: 28.38

TIP: 2.00

TOTAL: 30.38

Lunch

MI

gas

Texaco Star Mart
5288 E. Broadway
Tucson, Az
(520)478-8848

Invoice # 8198889
Date 83/13/99
Time 83:15PM
Auth # 88584774

MASTERCARD Acct #
5424 1888 1838 9921
KEY/CHARLETTE B

Pump Gallons Price
88 16.408 \$1.849

Product Amount
Unleaded \$17.28

Total Sale \$17.28

Thank You....
Please Come Again
Have A Great Day !!

DRIVER'S LICENSE NO. AND STATE	EL PASO TX 89919
EMPLOYEE CODE	REG #1 TRX #2522080 CASHIER #7
Ultramar Diamond Shamrock	3/12/99 13:38
THANK YOU	GALS PRICE TOT FUEL MERCH GRADE
	16.309 20.909 14.82 8.28 UNL
INCLUDES: ULTRAMAR DIAMOND SHAMROCK P.O. BOX 831 AMARILLO, TX 79106 PHONE: (806) 394-4907 PHONE: (800) 333-5888	OTHER CASHBACK
	0.00 0.00
PRICES INCLUDE ALL APPLICABLE FEDERAL, STATE, AND LOCAL TAXES	TOTAL: 23.10 MC PURCHASE
RETAIN THIS ORIGINAL COPY FOR YOUR RECORDS	ACCT #5424 1888 1838 9921 EXP 10/99
	APPROVAL # 271126 AUTO REF: 049757

gas
snacks

MM

0112333.

Thanks For Your Business

C & W #9 H983022
8218 HWY 87 N
SAN ANGELO, TX 769030000
L618198335901/109161/983022

Mar 12, 1999 -- 6:32 AM

14.598 Gals UNL @ 0.959:	\$14.88
Merchandise:	\$8.11
Total	\$22.11

HC: 5424180010389921 Exp: 10/99
I agree to pay above total amount
according to Card Issuer Agreement

gas
snacks-
for breakfast

000000155-01 TOWN COUNTRY 144
1001 4TH AVE STERLING CITY TX

NASTLECAVO

REF # 9800000000
DATE 03/15/99 00:50

PUMP #	37
PRODUCT	REG
GALLONS	5.109
PRICE/GAL:	\$ 0.979
TOTAL SALE	\$ 5.00
APPROVAL #	045870

gas

MI

1 Law Office of
 2 LYNN ELAINE SAUL, P.C.
 3 100 N. Stone Avenue, Suite 602
 4 Tucson AZ 85701
 5 (520) 882-6226
 Fax (520) 882-7678
 By: LYNN ELAINE SAUL
 State Bar # 3343
 Pima County Comp. # 40164
 Attorney for Respondent

99 APR -1 AM 11:32
 PATRICIA S. ...
 CLERK SUPERIOR COURT
 BY [Signature] DEPUTY

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
 7 IN AND FOR THE COUNTY OF PIMA

8	In re the Marriage of)	
9	TAMMY LYNN MAGILL, fka FLORES,)	No. D-112333
10	Petitioner)	
11	and)	CONFIRMATION NOTICE
12	ROBERT STEWART FLORES,)	ORDER TO SHOW CAUSE FOR
13	Respondent)	MODIFICATION OF CHILD
14	_____)	SUPPORT
15)	
16)	

17 Pursuant to Rule 8.3 (e) of the Pima County Superior Court Local
 18 Rules, Respondent Robert Stewart Flores, by his attorney, LYNN
 19 ELAINE SAUL, hereby confirms the hearing date and time of Monday
 20 April 5, 1999 at 10 a.m. (Division to be announced), on his Order
 21 to Show Cause for Modification of Child Support.
 22 DATED this 1st of April, 1999.

23 Cause Dead
 24 LYNN ELAINE SAUL
 Attorney for Respondent

25 Copy mailed this 1st of
 26 April, 1999 to:
 JeanMoskow
 27 Butler & Stein, PC
 100 S. Church Avenue, #9300
 28 Tucson AZ 85701-1608
 Attorney for Petitioner

RECEIVED
 CALENDAR SERVICES
 APR - 1 1999
 PIMA COUNTY
 SUPERIOR COURT

MI

6,
FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT
April 7, 1999 (11:11 a.m.)
By: Cathy Pearson

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE PRO TEMPORE: HON. DOUGLAS MITCHELL CASE NO. **D-112333**

COURT REPORTER: Van Honeman DATE: April 5, 1999

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES, nka MCGILL
Petitioner

Jean Moskow
Petitioner's Attorney

and

ROBERT STEWART FLORES
Respondent

Carrie Duvall
Respondent's Attorney

MINUTE ENTRY

ORDER TO SHOW CAUSE RE MODIFICATION OF CHILD SUPPORT (Post-Decree):

The petitioner is present by telephone. Respondent is present.

Counsel make opening statements.

Petitioner's Exhibit 1, being Insurance Information, is identified.

Petitioner's Exhibit 2, being a copy of Expenses Round-trip San Angelo, Texas-Tucson, Arizona, is identified.

Petitioner's Exhibit 3, being a copy of a Notice of Loan Guarantee and Disclosure Statement, is identified.

Respondent's Exhibit A, being a copy of the respondent's pay stub dated 2/19/99, is identified.

Respondent's Exhibit B, being a copy of the respondent's pay stub dated 12/24/98, is identified.

Respondent's Exhibit C, being a copy of a memo dated 1/11/99, is identified.

Respondent's Exhibit D, being a copy of a Notice of Loan Guarantee and Disclosure Statement, is identified.

Respondent's Exhibit E, being a copy of an Estimate Repayment Schedule, is identified.

FOR THE RESPONDENT:

Robert Stewart Flores is sworn, examined, and cross-examined.

Cathy Pearson
Deputy Clerk

M-K

MINUTE ENTRY

Page: 2

Date: April 5, 1999

Case No: **D-112333**

Respondent's Exhibits A, B, D, and E, each previously identified, are admitted.

Tammy Lynn McGill is sworn, cross-examined under the Rule, and examined.

Petitioner's Exhibits 1 and 2, each previously identified, are admitted.

The respondent rests. Both sides rest.

THE COURT REPORTER IS EXCUSED.

Counsel make closing arguments.

The Court takes the matter under advisement.

cc: Hon. Douglas Mitchell
Domestic Calendaring
Jean Moskow, Esq.
Carrie Duvall, Esq.
Clerk of Court - Under Advisement Clerk

Cathy Pearson
Deputy Clerk

M-K

6

1

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT
April 13, 1999 (4:51 p.m.)
By: Rene J. Redmond

ARIZONA SUPERIOR COURT, PIMA COUNTY
JUDGE PRO TEMPORE: HON. K.C. STANFORD
COURT REPORTER: NONE

CASE NO. **D-112333**
DATE: April 13, 1999

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES, NKA MCGILL
 Petitioner
and
ROBERT STEWART FLORES
 Respondent

M I N U T E E N T R Y

UNDER ADVISEMENT RULING RE ATTORNEY FEES:

The Court reviews the Respondent's affidavit and the Petitioner's response, the fees and costs incurred by each party, the comparative gross earning ability of the parties and the merits of the parties' contentions.

IT IS ORDERED that each party shall bear his/her own attorney's fees and court costs.

cc: Hon. K.C. Stanford
Domestic Calendaring
Jean Moskow, Esq.
Lynn Elaine Saul, Esq.
Under Adviseement Clerk

Rene J. Redmond
Deputy Clerk

MI

FILED
PATRICIA W. HOLLAND

99 APR 29 PM 7:17

BY: V. ARMY, DEPUTY

1 Law Office of
2 LYNN ELAINE SAUL, P.C.
3 647 North Ninth Avenue
4 Tucson AZ 85705
5 (520) 882-6226
6 Fax (520) 882-7678
7 By: CARRIE DEVALL
8 State Bar # 018316
9 Pima County Comp. # 65209
10 Attorney for Respondent

11 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
12
13 IN AND FOR THE COUNTY OF PIMA

14 In re the Marriage of)
15) No: D-112333
16 TAMMY LYNN MAGILL, fka FLORES)
17)
18) AFFIDAVIT OF NEW
19) INFORMATION REGARDING
20) MODIFICATION OF SUPPORT
21)
22) (Heard by Hon. Douglas P.
23) Mitchell)
24)
25)
26)
27)
28)
29)

30 Respondent ROBERT STEWART FLORES hereby makes this Affidavit of New
31 Information Regarding Modification of Support, as follows:

32 I. Respondent, ROBERT STEWART FLORES, being duly sworn according
33 to law, states that his employment as an LPN at St. Joseph's
34 Hospital, Carondelet Health Network was terminated effective May
35 22, 1999. Carondelet announced layoffs of one hundred and sixty
36 other employees at St. Joseph's Hospital and at St. Mary's Hospital
37 on April 20, 1999, effective in May 1999.

38 II. Respondent is currently seeking new employment, but he does
39 not believe that he will be able to secure employment starting at
40 his previous wage rate due to the fact that he is certified through
41 a reciprocity program with the state of Texas and is not certified
42 in I.V. medication. L.P.N.'s certified in Arizona are required to

M-9

1 be certified in I.V. medication. Respondent believes that he will
2 only be eligible for an entry-level position, starting at a
3 substantially lower hourly wage.

4 III. Respondent has attached and hereby incorporates herein copies
5 of his termination notice from Carondelet Health Network, as
6 "Exhibit A", and his Wage Statement for Unemployment Insurance,
7 issued by the Arizona Department of Economic Security on 4/20/99, "58".

8 DATED this April 29, 1999.

9

10 STATE OF ARIZONA)
)
11 COUNTY OF PIMA)

12 ROBERT STEWART FLORES hereby swears or affirms that he is the
13 Respondent in this matter, and that the contents of this Affidavit
14 of New Information are true and correct to the best of his
15 knowledge, information and belief.

16

R. Flores LAD
ROBERT STEWART FLORES

17

18 SUBSCRIBED and SWORN TO OR AFFIRMED before me this 29th day of
April, 1999.

19

Carrie Devall
NOTARY PUBLIC

20

21

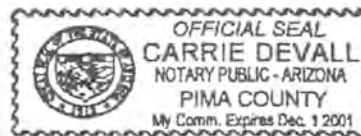
My commission expires:

22

23 Copy mailed this 29th day
24 of April, 1999 to
25 JEAN MOSKOW
26 BUTLER & STEIN, P.C.
110 S. Church Ave., #9300
Tucson, AZ 85701-1608
Attorney for Petitioner

27

28



M-Q

CARONDELET

HEALTH NETWORK

*St. Joseph's
Hospital*

350 North
Wilcox Rd.

Tucson, AZ
85711-2678

(520) 296-3211

April 22, 1999

To Whom It May Concern:

Robert Flores' employment was terminated effective this date, May 22, 1999. He will receive no benefits or tuition reimbursement.

*Also part of
Carondelet:*

*Advantage
Health, Inc*

*Holy Cross
Hospital*

*Holy Family
Center*

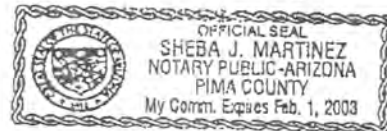
*St. Mary's
Hospital*

Sincerely,



Carol Martin
Director Surgical Services

CM/bg



*Member of
Carondelet Health
System*

*Sponsored by the
Sisters of St. Joseph
of Carondelet*

M-0

EXHIBIT "B"

D112333

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
UNEMPLOYMENT INSURANCE PROGRAM

This is your Wage Statement for your Unemployment Insurance claim.

Please examine it carefully to be sure that:

- Your name, address, and social security number are correct.
- All your wages and employers are correct.
- All the wages belong to you.

Date: 04/20/1999
 Explanation: ORIGINAL DETERMINATION
 Local Office: 810
 PO BOX 5067
 TUCSON AZ 85703-0067



ROBERT S FLORES
 7014 E GOLF LINKS RD APT 202
 TUCSON AZ 85730-1064

The back of this form has:

- An explanation of this determination.
- What to do if any information on this form is missing or incorrect. Protect must be filed within 10 working days of the date on this form.
- Special information regarding military, federal civilian wages, and wages earned in other states.

B. SOCIAL SECURITY NUMBER	C. WEEKLY BENEFIT AMOUNT	D. MAXIMUM AWARD	E. BASE PERIOD	F. EFFECTIVE DATE	G. BENEFIT YEAR ENDS
[REDACTED]	195.00	4,698.00	01/01/1998 12/31/1998	04/18/1999	04/15/2000

H. BASE PERIOD EMPLOYERS	I. QUARTER/ YEAR	J. QUARTER/ YEAR	K. QUARTER/ YEAR	L. QUARTER/ YEAR	M. TOTAL WAGES THIS EMPLOYER
ST MARYS ST JOSEPHS	1/1998 4,492.52	2/1998 5,253.10	3/1998 4,347.60	4/1998	14,093.22

TOTALS:	N. 4,492.52	O. 5,253.10	P. 4,347.60	Q. .00	R. 14,093.22
---------	-------------	-------------	-------------	--------	--------------

YOUR WEEKLY BENEFIT AMOUNT IS SHOWN IN ITEM C AND YOUR TOTAL AWARD IS SHOWN IN ITEM D. PAYMENTS WILL BE MADE IF YOU FILE CLAIMS AS DIRECTED AND MEET ALL ELIGIBILITY REQUIREMENTS.

Este formulario indica si Ud. califica para seguro de desempleo basado en su salario. Si Ud. no lee ingles, busque quien le traduzca la informacion o comuniquese con su oficina de seguro de desempleo.

Equal Opportunity Employer/Program

This document available in alternative formats by contacting your local office manager.

M-0

6

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT
May 5, 1999 (4:44 p.m.)
By: Cathy Pearson/sp

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE PRO TEMPORE: HON. DOUGLAS MITCHELL

CASE NO. D-112333

COURT REPORTER: NONE

DATE: May 5, 1999

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES, nka MCGILL

Petitioner

and

ROBERT STEWART FLORES

Respondent

MINUTE ENTRY

IN CHAMBERS UNDER ADVISEMENT RULING:

This matter has come before the Court on a Petition to Modify Child Support. After considering the Court file, the exhibits admitted at trial, and the testimony of the parties, including their demeanor and credibility, the Court finds as follows:

1. The parties were divorced on August 1, 1997, pursuant to the terms of a Decree of Dissolution of Marriage agreed to between the parties during a settlement conference. At the time of the settlement conference and entry of the Decree, it was the anticipation of the parties that Petitioner would be moving to San Angelo, Texas with the children. The Joint Custody Parenting Plan approved by the Court provides that Petitioner would pay all transportation costs associated with Respondent's visitation rights. At the time of the entry of the Decree, Petitioner was earning approximately the same as her current income.

2. There has been a material, substantial, and continuing change of circumstances in that Respondent has cutback the number of hours he works as a licensed practical nurse in order to attend to school to secure his Bachelor of Science in nursing. Subsequent to the hearing of April 5, 1999, the Court was informed that Respondent has been terminated from his employment as one of the numerous layoffs at St. Joseph's Hospital. It is appropriate to attribute to each parent minimum wage under the

Cathy Pearson/sp
Deputy Clerk

M-K

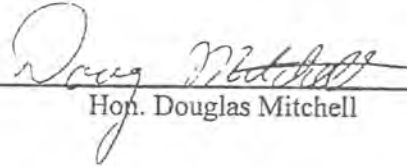
MINUTE ENTRY

Page: 2

Date: May 5, 1999

Case No: D-112333

present circumstances. The Court adopts the findings in the attached Child Support Order which shall be effective with the first payment due for the month of February 1999. The Court given Respondent a .068 credit for visitation to account for the transportation times credited in Judge Stanford's Minute Entry of March 9, 1999.



Hon. Douglas Mitchell

cc: Hon. Douglas Mitchell
Domestic Calendaring
Clerk of Court - Under Advisement Clerk
Jean Moskow, Esq.
Carrie Duvall, Esq.
Clerk of Court - Child Support Unit

Cathy Pearson/sp
Deputy Clerk

M-K

SUPERIOR COURT OF ARIZONA, COUNTY OF PIMA

TAMMY LYNN FLORES, nka MCGILL
 Petitioner,
 02/04/64 [REDACTED]
 DOB SSN
 vs.
ROBERT STEWART FLORES
 Respondent,
 02/24/61 [REDACTED]
 DOB SSN

Case No. D-112333

CHILD SUPPORT ORDER

FILED
 5/6 99
PATRICIA A. NOLAND, Clerk
C. Pearson
 Deputy

THE COURT FINDS THAT:

1. The parties owe a duty to support the following children:

<u>Name</u>	<u>Date of Birth</u>	<u>Social Security Number</u>
Casey Alexander Flores	02/25/87	
Dakota Ryan Flores	06/12/92	

2. The parties' circumstances are as follows:

	<u>FATHER</u>	<u>MOTHER</u>	<u>COMBINED</u>
Gross Income	893	(8) 893	
Spousal Maintenance Paid		(9)	
Child Support Paid		(10)	
Adjustment for Supporting Other Children		(11)	
Adjusted Gross Income	893	(12) 893	(13) 1,786
Basic Child Support Obligation			(15) 503
Medical Insurance Premium			(16) 20
Child Care			(17)
Extra Education			(18)
Child(ren) 12 or Older			(19) 25
Extraordinary Child			(20)
Total Child Support Obligation			(22) 548
Proportionate Share of Income	50%(25)	%	
Each Parent's Support Obligation	274 (28)		
Adjustment for Costs Associated with Visitation	34 (29)		
Medical Insurance Premium Adjustment		(30)	
Day care Adjustment Non-Custodial Parent		(31)	
Court Approved Discretionary Visitation Adjustment		(32)	
Preliminary Child Support Amount	240 (34)		

M-0

Self Support Reserve Test

Paying parents ADJUSTED gross income	\$ 893.00
minus	-\$645.00
the resulting amount is (35)	<u>\$ 248.00</u>

If this amount is less than the Preliminary Child Support Amount, line 34, the court SHALL order the resulting amount as child support order on line 35, absent a deviation.

3. Obligor's employer/payor is:

Name:

Payroll Dept. Address:

4. Written Findings for Physical Custody Adjustment, Court Approved Discretionary Visitation Adjustment and/or Other Adjustments:

The court finds that the payor has the ability to pay child support.

- In the amount entered on line 34 \$ 240
- In an adjusted amount calculated using the self support reserve on line 35. \$ _____

6. The court, having considered the best interests of the child(ren), deviates from the guidelines for the following reasons:

- Application of the guidelines is inappropriate.
- Application of the guidelines is unjust.
- The parties have signed a written agreement with knowledge of the amount of support that would have been ordered by the guidelines but for the agreement.

The court makes the following findings regarding the deviation:

- The child support order would have been \$ _____
- The child support order after deviation is \$ _____
- All parties have signed the agreement free of duress and coercion.

M-O

D112333

IT IS ORDERED THAT:

- A. The **Respondent** shall pay child support of **\$ 240.00** per month. If this is a modification of child support, all other prior orders of this court not modified herein remain in full force and effect. The effective date of the obligation to pay child support ordered by the Court is **02/01/99**. The first payment is due **02/01/99**.

Payments shall be made through the Support Payment Clearinghouse pursuant to an Order of Assignment signed this date. At any time the obligor's employer/payor is not paying pursuant to an Order of Assignment, the obligor must make full and timely payment directly to:

Support Payment Clearinghouse
P.O. Box 52107
Phoenix, AZ 85072-2107

Payments not made through the Clerk of the Court/Clearinghouse shall be considered gifts unless otherwise ordered. Payments must include the case number and the obligor's name.

- B. Unless the court has ordered otherwise, the parties affected by this order shall notify the Clerk of the Court/Clearinghouse of their addresses and shall notify the Clerk/Clearinghouse of any change of address within ten (10) days. The obligor shall also notify the Clerk/Clearinghouse of the names and addresses of the obligor's employers or other payors and, within 10 days, of any changes thereof.

- C. **Petitioner** is responsible for providing medical insurance for the children.

Respondent shall pay **50%** of any uninsured medical expenses and the other party shall pay the remainder.

- D. The costs of visitation-related travel/transportation shall be shared by the parents as follows:
Father: _____ Mother: _____

- E. The parties shall:

- Exchange financial information such as copies of tax returns, earnings statements, and a Parent's Worksheet every 24 months.
- Exchange residential addresses and the names and addresses of their employers every 24 months.

- F. The court allocates the tax exemption(s) as follows: **Each of the parties shall be entitled to claim one of the minor children as dependents for federal and state tax purposes each tax year until further order of the Court.**

Date 5.6.99



HON. DOUGLAS MITCHELL

M-O

FILED
5/6/99
PATRICIA A. NOLAND, Clerk
C. Pearson
Deputy

SUPERIOR COURT OF ARIZONA, COUNTY OF PIMA

TAMMY LYNN FLORES, nka MCGILL)
)
)
Petitioner,)
)
vs.)
)
ROBERT STEWART FLORES)
)
Respondent.)

Case No. D-112333

ORDER OF ASSIGNMENT

Ex Parte
 After Hearing
 Automatic

TO: Current and future employers or other payors of:
Name: ROBERT STEWART FLORES
Social Security Number: [REDACTED]

You shall withhold court-ordered payments as follows:

Current Child Support \$ 240.00
Spousal Maintenance \$
Payments on Arrears \$
Other Amounts \$

R

for the total amount per month of \$ 240.00 but no more than 50% of the disposable earnings (A.R.S. §33-1131) to be made payable to the Support Payment Clearinghouse, plus an additional annual handling fee amount (A.R.S. §12-284).

THIS ORDER MODIFIES ANY PREVIOUSLY ORDERED ASSIGNMENT WITH THE SAME CASE NUMBER AS IN NUMBER ABOVE.

M-3

Case Number D-112333

This Order of Assignment is effective immediately upon receipt by an employer or other payor, including self-employed persons, and continues until further Order, or until a period of 90 continuous days from the last payment to the Obligor. If you are again obligated to pay monies to the Obligor within 90 days, you are again bound by this Order of Assignment. Any employer or other payor of monies shall begin withholding no later than fourteen days after receipt of an Order of Assignment. Payment must be sent to the Clearinghouse within two business days of the date the monies were withheld.

If this is an Order "Ex Parte" Order and you are the first employer or other payor served, you are ordered to serve by personal delivery or registered mail a copy of: (1) the Request, (2) the Order of Assignment, and (3) the Notice to the person ordered to pay child support or spousal support (maintenance) within ten days of the date you were served. The first employer or other payor served shall not withhold or deduct amounts specified in the Ex Parte Order of Assignment for fourteen calendar days to allow the obligor an opportunity to contest the Order of Assignment, if necessary, pursuant to A.R.S. §25-504(G).

You shall not discharge or otherwise discipline the person named in this assignment, because of services of this Order of Assignment.

All Payments shall be sent to :

Support Payment Clearinghouse
P.O. Box 52107
Phoenix, AZ 85072-2107

Please reference the Court Case number and ATLAS number on the first page as well as the employee's name and Social Security Number on all payments sent on the Transmittal of Payment Form.

Dated: May 6 1989


HON. DOUGLAS P. MITCHELL

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 9300
TUCSON, ARIZONA 85701
(520) 628-1618

1 Jean Moskow, Esq.
2 BUTLER & STEIN, P.C.
3 110 South Church Ave.
4 Suite 9300
5 Tucson, Arizona 85701
6 (520) 628-1618
7 Pima County Computer No. 64512

8 Attorney for Petitioner

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

99 MAY 12 PM 6:29

BY: V. ARMY, DEPUTY

9 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

10 IN AND FOR THE COUNTY OF PIMA

11 In re the Marriage of:)
12) No. D-112333
13 TAMMY LYNN FLORES)
14 (nka: Tammy Lynn Magill),)
15) MOTION TO RECONSIDER
16) MAY 5, 1999 MINUTE ENTRY
17) ORDER
18 vs.)
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18 TAMMY LYNN MAGILL ("Petitioner"), through her undersigned attorney,
19 hereby requests that this Court reconsider its May 5, 1999 Minute Entry Order
20 entered in the above captioned matter. Specifically, Petitioner requests that this
21 Court render its ruling on how the visitation-related transportation expenses
22 should be allocated between the parties. It is Petitioner's position that
23 Respondent, **ROBERT STEWART FLORES** ("Respondent") should bear such
24 expenses given the paltry amount of child support he is now obligated to pay
25 Petitioner. Petitioner admits that she initially agreed to pay all visitation-related
26 transportation expenses; however, at the time of that agreement Respondent
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also agreed to a monthly child support obligation of \$400. That amount has been drastically reduced by this Court's May 5, 1999 Minute Entry. In addition, the cost of transporting the children between San Angelo, Texas and Tucson, Arizona is not inconsequential. (See Exhibits 1 and 2 to Petitioner's March 29, 1999 Response to Petitioner's Affidavit of Attorney's Fees). The reduction of Respondent's child support obligation without a concomitant increase in his responsibility for visitation-related expenses would place an unfair financial burden on Petitioner and seriously undercut her ability to comply with the Parenting Plan agreed to by the parties and approved by this Court.

For the reasons set forth above, Petitioner requests that this Court order Respondent to pay all visitation-related transportation costs until such time as he is once again earning an income equal to or greater than that for which he has shown potential in the past.

RESPECTFULLY SUBMITTED this 12 day of May, 1999.

BUTLER & STEIN, P.C.



Jean Moskow
Attorney for Petitioner

COPY of the foregoing mailed this 12 day of May, 1999, to:

Lynn Saul, Esq.
647 N. Ninth Avenue
Tucson, AZ 85705-0000
Attorney for Respondent

BUTLER & STEIN, P.C.
ATTORNEYS AT LAW
110 SOUTH CHURCH AVENUE
SUITE 8300
TUCSON, ARIZONA 85701
(520) 828-1818



Jean Moskow
Plaintiff's Attorney

Tammy Lynn McGill
Plaintiff

Carrie Dwall
Defendant's Attorney

Robert Stewart Flores
Defendant

CASE NO. D-112-333 DATE: 4/5/99

TYPE OF HEARING: ose-modify
Child Support

EXHIBIT LIST

Iden.	Adm.	Description	Disposition
✓ 1	1	Insurance Information	
✓ 2	2	Copy - Expenses Round-trip San Angelo, Texas - Tucson, AZ	
✓ 3		Copy - Notice of Loan Guarantee and Disclosure Statement	
✓ A	A	Copy - Pay stub of Robert Flores - 2/19/99	Envelope
✓ B	B	" - 12/24/98	
✓ C		Copy - memo dated 1/11/99	
✓ D	D	Copy - Notice of Loan Guarantee and Disclosure	
✓ E	E	Copy - Estimate Repayment Schedule	

Ex. Received from C. Pearson Date 5-7-99 By MR

FILED
PATRICIA A. NOLAND
CLERK OF THE COURT

99 MAY 17 PM 5:00

BY: E. BRADFORD,
DEPUTY

1 *Law Office of*
2 **LYNN ELAINE SAUL**

3 *647 N. Ninth Avenue*
4 *Tucson AZ 85705*

5 *(520) 882-6226*

6 *Fax (520) 882-7678*

7 *State Bar # 3343*

8 *Pima County Comp. # 40164*

9 Attorney for Respondent

10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

11 IN AND FOR THE COUNTY OF PIMA

12 In re the Marriage of _____)

13 TAMMY LYNN FLORES)

14 Petitioner,)

15 and)

16 ROBERT STEWART FLORES)

17 Respondent.)

No. D-112333

OPPOSITION TO
PETITIONER'S MOTION TO
RECONSIDER MAY 5, 1999
MINUTE ENTRY ORDER

(Heard by Hon. Douglas
Mitchell)

18 Respondent ROBERT STEWART FLORES, by his attorney, LYNN ELAINE
19 SAUL, hereby files this Opposition to the Motion to Reconsider May
20 5, 1999 Minute Entry Order filed by Petitioner, as follows:

21 I. The Hon. Douglas Mitchell, in deciding the issues before him
22 for modification of child support, had all relevant facts as
23 well as the law of the case before him, and made his decision
24 based on his application of the law, and his reasonable
25 discretion, to the facts as presented to him.

26 II. The Court was clearly aware of the original agreement of the
27 parties concerning transportation, as well as Petitioner's
28 subsequent and current argument that she should not have to
bear all transportation expenses, both from his review of the

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1 file, his review of the original Conciliation Court agreement
2 of the parties, his review of Judge Stanford's March 9, 1999
3 Minute Entry concerning changes in visitation dates, and the
4 evidence presented at the April 5, 1999 hearing and
5 Respondent's subsequent affidavit of being laid off from work
6 in connection with massive lay-offs from St. Joseph's Hospital
7 of which the Court was also aware from news accounts.

8 III. For the Court to reconsider its decision, considering that the
9 Court had all relevant facts and arguments of the parties
10 before him when making his May 5, 1999 decision, would place
11 an unfair burden and expense on the parties to continue to
12 argue this matter.

13 WHEREFORE Respondent requests that this Court deny Petitioner's
14 Motion to Reconsider the May 5, 1999 Minute Entry order concerning
15 transportation expenses.

16 DATED this 17th day of May, 1999.

17
18 Lynn Elaine Saul
19 LYNN ELAINE SAUL
Attorney for Respondent

20 Copy mailed May 17, 1999 to:
21 Jean Moskow
22 BUTLER & STEIN, PC
23 110 S. Church Avenue, Suite 9300
Tucson AZ 85701
Attorney for Petitioner

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FILED
PATRICIA A. HOLLAND
CLERK OF SUPERIOR COURT

99 MAY 18 AM 11:45

BY: S. GRAHAM, DEPUTY

TAMMY LYNN FLORES, nka MCGILL

Petitioner,

vs.

ROBERT STEWART FLORES

Respondent.

Case No. D-112333

000494451800

ORDER OF ASSIGNMENT

- Ex Parte
- After Hearing
- Automatic

TO: Current and future employers or other payors of:

Name: ROBERT STEWART FLORES

CLERK OF THE SUPERIOR COURT

Pima County Superior Courts Building
110 WEST CONGRESS STREET
TUCSON, ARIZONA 85701-1317



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Tucson, AZ 85711~~

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31

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT
June 3, 1999 (12:05 a.m.)
By: Cathy Pearson/sp

ARIZONA SUPERIOR COURT, PIMA COUNTY

JUDGE PRO TEMPORE: HON. DOUGLAS MITCHELL

CASE NO. **D-112333**

COURT REPORTER: NONE

DATE: June 3, 1999

IN RE THE MARRIAGE OF:

TAMMY LYNN FLORES

Petitioner

and

ROBERT STEWART FLORES

Respondent

MINUTE ENTRY

IN CHAMBERS:

The Court having considered Petitioner's Motion to Reconsider May 5, 1999 Minute Entry Order, and Respondent's Objection thereto,

IT IS ORDERED that Petitioner's Motion to Reconsider is DENIED.

cc: Hon. Douglas Mitchell *ds*
Domestic Calendaring
Jean Moskow, Esq.,
Lynn Elaine Saul, Esq.

Cathy Pearson/sp
Deputy Clerk

M-K

FILED
PATRICIA A. HENDON
CLERK OF COURT

99 AUG 11 PM 4:49

OMB Control #: 0970-0154

ORDER/NOTICE TO WITHHOLD INCOME FOR CHILD SUPPORT

State: ARIZONA

Co./ City/ Dist. of PIMA

Date of Order/Notice: July 29, 1999

Court/Case Number: D112333 ATLAS NO. 000494451800

BY: S. GRAHAM, DEPUTY Original Order/Notice

() Amended Order/Notice

() Terminate Order/Notice

6210067560)	RE: *FLORES, ROBERT S
Employer/Withholder's Federal EIN Number)	Employee/Obligor's Name (Last, First, MI)
EL DORADO HOSPITAL)	
Employer/Withholder's Name)	Employee/Obligor's Social Security Number
)	*000494451800
Employer/Withholder's Address)	Employee/Obligor's Case Identifier
1400 N WILMOT)	FLORES, TAMMY L
)	Custodial Parent's Name (Last, First, MI)
TUCSON, AZ 85712)	

Child(ren)'s Name(s):	DOB	Child(ren)'s Name(s):	DOB
CASEY ALEXANDER FLORES	02/25/1987	DAKOTA RYAN FLORES	06/12/1992

ORDER INFORMATION: This is an Order/Notice to Withhold Income for Child Support based upon an order for support from ARIZONA. By law, you are required to deduct these amounts from the above-named employee/obligor's income until FURTHER NOTICE even if the Order/Notice is not issued by your State.

() If checked, you are required to enroll the child(ren) identified above in any health insurance coverage available through the employee's/obligor's employment.

\$ 400.00 per MONTH in current support
 \$ 100.00 per MONTH in past-due support Arrears 12 weeks or greater? () yes () no
 \$ 0.00 per MONTH in medical support
 \$ 2.25 per MONTH in other (specify) CLEARINGHOUSE FEE
 \$ 0.00 per MONTH in other (specify) SPOUSAL MAINTENANCE
 for a total of:
 \$ 502.25 per MONTH to be forwarded to the payee below.

Robert Flores
Tammy Flores

D112333

You do not have to vary your pay cycle to be in compliance with the support order. If your pay cycle does not match the ordered support payment cycle, use the following to determine how much to withhold:

\$ 115.99 weekly pay period	\$ 251.13 semimonthly pay period (twice a month)
\$ 231.45 biweekly pay period (every two weeks)	\$ 502.25 monthly pay period

REMITTANCE INFORMATION: Follow the laws and procedures of the employee/obligor's principal place of employment even if such laws and procedures are different from this paragraph:

You must begin withholding no later than the first pay period occurring fourteen (14) calendar days after the date of this Order/Notice. Send payment within two (2) working days of the paydate/date of withholding. You are entitled to deduct a fee of \$1.00 per pay period or \$4.00 per month which ever is greater to defray the cost of withholding. The total withheld amount, including your fee, cannot exceed 50% of the employee's/obligor's aggregate disposable weekly earnings. For the purpose of the limitation on withholding, the following information is needed (see #9 on back):

When remitting payment provide the paydate/date of withholding and the case identifier 000494451800. If remitting by EFT/EDI, use this FIPS code: *N/A; Bank routing code: *N/A; Bank account number: *N/A

Make it payable to: CLEARINGHOUSE, ATLAS NO. 000494451800
Send check to: P O BOX 52107
PHOENIX, AZ 85072-2107

Authorized by: _____

M-O

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

CMB Control #: 0970-0154

ORDER/NOTICE TO WITHHOLD INCOME FOR CHILD SUPPORT

State: ARIZONA

Co./ City/ Dist. of PIMA

Date of Order/Notice: August 19, 1999

Court/Case Number: D112333 ATLAS NO. 000494451800

BY: S. GRAHAM, DEPUTY

- Original Order/Notice
- Amended Order/Notice
- Terminate Order/Notice

99 AUG 19

5210067560
Employer/Withholder's Federal EIN Number

EL DORADO HOSPITAL
Employer/Withholder's Name

Employer/Withholder's Address

1400 N WILMOT

TUCSON, AZ 85712

RE: *FLORES, ROBERT S
Employee/Obligor's Name (Last, First, MI)

*
Employee/Obligor's Social Security Number

*000494451800
Employee/Obligor's Case Identifier

FLORES, TAMMY L
Custodial Parent's Name (Last, First, MI)

Child(ren)'s Name(s):	DOB	Child(ren)'s Name(s):	DOB
CASBY ALEXANDER FLORES	02/25/1987	DAKOTA RYAN FLORES	06/12/1992

ORDER INFORMATION: This is an Order/Notice to Withhold Income for Child Support based upon an order for support from ARIZONA. By law, you are required to deduct these amounts from the above-named employee/obligor's income until FURTHER NOTICE even if the Order/Notice is not issued by your State.

If checked, you are required to enroll the child(ren) identified above in any health insurance coverage available through the employee's/obligor's employment.

\$ per MONTH in current support

\$ per MONTH in past-due support Arrears 12 weeks or greater? yes no

\$ per MONTH in medical support

\$ 2.25 per MONTH in other (specify) CLEARINGHOUSE FEE

\$ per MONTH in other (specify) SPOUSAL MAINTENANCE

for a total of:

\$ per MONTH to be forwarded to the payee below.

Robert Flores

D112333

Tammy Flores

You do not have to vary your pay cycle to be in compliance with the support order. If your pay cycle does not match the ordered support payment cycle, use the following to determine how much to withhold:

\$ per weekly pay period	\$ per semimonthly pay period (twice a month)
\$ per biweekly pay period (every two weeks)	\$ per monthly pay period

REMITTANCE INFORMATION: Follow the laws and procedures of the employee/obligor's principal place of employment even if such laws and procedures are different from this paragraph:

You must begin withholding no later than the first pay period occurring fourteen (14) calendar days after the date of this Order/Notice. Send payment within two (2) working days of the paydate/date of withholding. You are entitled to deduct a fee of \$1.00 per pay period or \$4.00 per month which ever is greater to defray the cost of withholding. The total withheld amount, including your fee, cannot exceed 50% of the employee's/obligor's aggregate disposable weekly earnings. For the purpose of the limitation on withholding, the following information is needed (see #9 on back):

When remitting payment provide the paydate/date of withholding and the case identifier 000494451800. If remitting by EFT/EDI, use this FIPS code: *N/A; Bank routing code: *N/A; Bank account number: *N/A

Make it payable to: CLEARINGHOUSE, ATLAS NO. 000494451800
Send check to: P O BOX 52107
PHOENIX, AZ 85072-2107

Authorized by:
Print Name: PIMA COUNTY ATTORNEY

M-K

FILED
FATIMA S. AND
1999

OMB Control #: 0970-0154

ORDER/NOTICE TO WITHHOLD INCOME FOR CHILD SUPPORT 99 OCT 12 PM 3:08

State: ARIZONA
Co./ City/ Dist. of PIMA
Date of Order/Notice: September 29, 1999
Court/Case Number: D112333 ATLAS NO. 000494451800

(X) Original Order/Notice
() Amended Order/Notice
() Terminate Order/Notice

BY: D. STERLING, DEPUTY

<u>8606460870</u>	RE: *FLORES, ROBERT S
Employer/Withholder's Federal EIN Number	Employee/Obligor's Name (Last, First, MI)
<u>THE CAROLETEL GROUP</u>	
Employer/Withholder's Name	Employee/Obligor's Social Security Number
Employer/Withholder's Address	*000494451800
	Employee/Obligor's Case Identifier
<u>6377 E TANQUE VERDE STE 220</u>	<u>MAGILL, TAMMY L</u>
	Custodial Parent's Name (Last, First, MI)
<u>TUCSON, AZ 85715</u>	

Child(ren)'s Name(s):	DOB	Child(ren)'s Name(s):	DOB
CASEY ALEXANDER FLORES	02/25/1987	DAKOTA RYAN FLORES	06/12/1992

ORDER INFORMATION: This is an Order/Notice to Withhold Income for Child Support based upon an order for support from ARIZONA. By law, you are required to deduct these amounts from the above-named employee/obligor's income until FURTHER NOTICE even if the Order/Notice is not issued by your State.

() If checked, you are required to enroll the child(ren) identified above in any health insurance coverage available through the employee's/obligor's employment.

\$ 240.00 per MONTH in current support
 \$ 0.00 per MONTH in past-due support Arrears 12 weeks or greater? () yes () no
 \$ 0.00 per MONTH in medical support
 \$ 2.25 per MONTH in other (specify) CLEARINGHOUSE FEE
 \$ 0.00 per MONTH in other (specify) SPOUSAL MAINTENANCE
 for a total of:
 \$ 242.25 per MONTH to be forwarded to the payee below.

D 112 333
 Robert S. Flores
 vs
 Tammy L. Magill

You do not have to vary your pay cycle to be in compliance with the support order. If your pay cycle does not match the ordered support payment cycle, use the following to determine how much to withhold:

\$ 55.95 weekly pay period	\$ 121.13 semimonthly pay period (twice a month)
\$ 111.64 biweekly pay period (every two weeks)	\$ 242.25 monthly pay period

REMITTANCE INFORMATION: Follow the laws and procedures of the employee/obligor's principal place of employment even if such laws and procedures are different from this paragraph:

You must begin withholding no later than the first pay period occurring fourteen (14) calendar days after the date of this Order/Notice. Send payment within two (2) working days of the paydate/date of withholding. You are entitled to deduct a fee of \$1.00 per pay period or \$4.00 per month which ever is greater to defray the cost of withholding. The total withheld amount, including your fee, cannot exceed 50% of the employee's/obligor's aggregate disposable weekly earnings. For the purpose of the limitation on withholding, the following information is needed (see #9 on back):

When remitting payment provide the paydate/date of withholding and the case identifier 000494451800. If remitting by EFT/EDI, use this FIPS code: *N/A; Bank routing code: *N/A; Bank account number: *N/A

Make it payable to: CLEARINGHOUSE, ATLAS NO. 000494451800
Send check to: P O BOX 52107
PHOENIX, AZ 85072-2107

Authorized by: _____

MI

ARIZONA SUPERIOR COURT
IN AND FOR THE COUNTY OF PIMA

FILED
PATRICIA A. NOLAND
CLERK, SUPERIOR COURT

00 FEB 14 PM 12:50

TAMMY FLORES

CASE NO: D-112333

Vs

BY: H. MULHOLLAND, DEPUTY

DATE: JAN 7, 2000

ROBERT FLORES

The Clerk of the Court has the exhibits in the above case available for release. The case was reviewed pursuant to the Rules of the Court, Civil Procedure, Rule 80, and are not subject to further modification. Expedite the process by contacting the Clerk of the Superior Court, at 740-3290, one day prior to the date you wish to retrieve your exhibits.

If you believe this notice has been issued in error, either because you are not the attorney of record, or matters are still pending in the case, please contact the Exhibits Unit at 740-3290.

PATRICIA A. NOLAND
CLERK OF THE SUPERIOR COURT

Donna Felix
Deputy Clerk

THIS INCLUDES ALL EXHIBITS IN THE POSSESSION OF THE CLERK'S OFFICE

PLTF Release Date:

Attorney:

Received By: _____

Released By: _____

DEFT Release Date:

Attorney: LYNN SAUL

Received By: _____

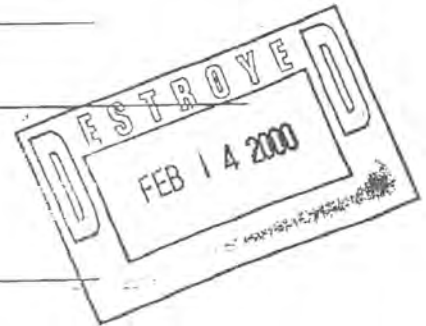
Released By: _____

COURT'S Release Date:

Judge:

Received By: _____

Released By: _____



M-E

FILED
PATRICIA A. NOLAND
CLERK, ARIZONA SUPERIOR COURT
IN AND FOR THE COUNTY OF PIMA
01 AUG 22 PM 2: 15

TAMYY LYNN FLORES

CASE NO: D-112333

Vs

BY: H. MULHOLLAND, DEPUTY

DATE: 7-17-01

ROBERT STEWART FLORES

The Clerk of the Court has the exhibits in the above case available for release. The case was reviewed pursuant to the Rules of the Court, Civil Procedure, Rule 80, and are not subject to further modification. Expedite the process by contacting the Clerk of the Superior Court, at 740-3290, one day prior to the date you wish to retrieve your exhibits.

If you believe this notice has been issued in error, either because you are not the attorney of record, or matters are still pending in the case, please contact the Exhibits Unit at 740-3290.

ALL PROPERTY NOT CLAIMED WITHIN 30 DAYS FROM THE DATE OF THIS NOTICE WILL BE DESTROYED.

PATRICIA A. NOLAND
CLERK OF THE SUPERIOR COURT

PATRICIA S. HOFMEISTER
Deputy Clerk

THIS INCLUDES ALL EXHIBITS IN THE POSSESSION OF THE CLERK'S OFFICE

PLTF Release Date:

Attorney: JEAN MOSKOW

Received By: _____

Released By: _____

DESTROYED

AUG 22 2001

DEFT Release Date:

Attorney: LYNN SAUL

Received By: _____

Released By: _____

DESTROYED

AUG 22 2001

COURT'S Release Date:

Judge:

Received By: _____

Released By: _____

ADM

M-B

ORDER/NOTICE TO WITHHOLD INCOME FOR CHILD SUPPORT

State: **Arizona**
Co./City/Dist of **PIMA**
Date of Order/Notice: **September 9, 2002**
Court/Case Number: **D112333**

Original Order/Notice
 Amended Order/Notice
 Terminate Order/Notice

FILED
PATRICIA A. ROLAND
CLERK, SUPERIOR COURT
02 OCT -4 PM 3:00

ATLAS NO. **000494451800**

Employer/Withholder's Federal EIN Number
NURSE FINDERS
Employer/Withholder's Name
Employer/Withholder's Address
5101 E FARNESS DR
TUCSON, AZ 85712-6116

Re: * **FLORES, ROBERT S**
Employee/Obligor's Name (Last, First, Middle) **BY: S. GRAHAM, DEPUTY**
Employee/Obligor's Social Security Number
* **000494451800**
Employee/Obligor's Case Identifier
LYNN, TAMMY
Custodial Parent's Name (Last, First, MI)

Child(ren)'s Name(s): **CASEY ALEXANDER FLORES** DOB **02/25/1987** Child(ren)'s Name(s): **DAKOTA RYAN FLORES** DOB **06/12/1992**

Order Information: This is an Order/Notice to Withhold Income for Child Support Based upon an order for support from **ARIZONA**. By law, you are required to deduct these amounts from the above named employee/obligor's income until **FURTHER NOTICE** even if the Order/Notice is not issued by your State.

If checked, you are required to enroll the child(ren) identified above in any health insurance coverage available through the employee's/obligor's employment.

\$ **240.00** per month in current support
\$ **79.20** per month in past-due support. Arrears 12 weeks or greater? yes no
\$ **0.00** per month in medical support
\$ **2.25** per month in other (specify) **CLEARINGHOUSE FEE**
\$ **0.00** per month in other (specify) **SPOUSAL MAINTENANCE**
for a total of:
\$ **321.45** per month to be forwarded to the payee below.

You do not have to vary your pay cycle to be in compliance with the support order. If your pay cycle does not match the ordered support payment cycle, use the following to determine how much to withhold:

\$ **80.36** first four weekly pay periods
\$ **160.73** first two bi-weekly pay periods
\$ **160.73** semi-monthly pay period (twice a month)
\$ **321.45** monthly pay period

REMITTANCE INFORMATION: Follow the laws and procedures of the employee/obligor's principal place of employment even if such laws and procedures are different from this paragraph:

You must begin withholding no later than the first pay period occurring **fourteen (14) calendar days** after the date of this Order/Notice. Send payment within **two (2) working days** of the paydate/date of withholding. You are entitled to deduct a fee of **\$1.00 per pay period or \$4.00 per month which ever is greater** to defray the cost of withholding. The total withheld amount, including your fee, cannot exceed 50% of the employee's/obligor's aggregate disposable weekly earning. For the purpose of the limitation on withholding, the following information is needed (see #9 on back):

When remitting payment provide the paydate/date of withholding and the case identifier **000494451800**. If remitting by EFT/EDI, use this FIPS code: *NA; Bank routing code: *NA; Bank account number: *NA.

Make it payable to: **CLEARINGHOUSE, ATLAS NO. 000494451800**
P O BOX 52107
PHOENIX, AZ 85072-2107

Authorized by: _____
Print Name:

