

FILED

2004 MAY 10 AM 10:36

TERESA A. ANDERSON, CLERK
COMMON PLEAS COURT
GREENE COUNTY, OHIO

IN THE COMMON PLEAS COURT OF GREENE COUNTY, OHIO
DIVISION OF DOMESTIC RELATIONS

QUENTIN DURRSTEIN
1935 Winterglen Court
Beavercreek, Ohio 45432-1886

CASE NO. 02-DR-207

JUDGE HURLEY

Plaintiff

vs.

MARIE A. TUTTLE-DURRSTEIN
223 #3 W. Funderburg
Fairborn, Ohio 45324

**MOTION FOR SOLE CUSTODY &
CHILD SUPPORT**

Defendant.

BRANCH I

Now comes the Plaintiff, **QUENTIN DURRSTEIN**, by and through his attorneys, **RION, RION & RION, L.P.A., INC.**, and hereby respectfully moves this Honorable Court for an order granting him sole custody of the minor children, to wit: ***Ford Allen Durrstein, born August 15, 1998***, and ***Justice Christina Durrstein, born March 10, 1995*** for the reasons set forth in the attached affidavit and for further reasons which will be set forth at the oral hearing.

BRANCH II

Now comes the Plaintiff, **QUENTIN DURRSTEIN**, by and through his attorneys, **RION, RION & RION, L.P.A., INC.**, and hereby respectfully moves this Honorable Court for an Order granting the plaintiff child support for the minor children herein.

An affidavit in support is attached.

An oral hearing is respectfully requested.

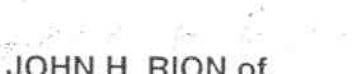
Respectfully submitted,



JOHN H. RION (#0002228)
JON PAUL RION (#0067020)
RION, RION & RION, L.P.A., INC.
Attorney for Plaintiff
Suite 2150
One First National Plaza
130 W. Second Street
P.O. Box 10126
Dayton, Ohio 45402
(937) 223-9133

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent to the Attorney for the Defendant, Jerome Hamilton, 2990 Maginn Dr, Beavercreek, OH 45434 on the same day of filing.



JOHN H. RION of
RION, RION & RION, L.P.A., INC.

13. Ford continually states he wants to live with me and is afraid of Ms. Tuttle-Durrstein.
14. Ms. Tuttle-Durrstein drives in a reckless and dangerous manner with the children in the car.
15. Ms. Tuttle-Durrstein has failed to provide information on the children's schools and doctor and actively worked to prevent me from having access to the children's records.
16. The children are either constantly sick or Ms. Tuttle-Durrstein is using it as an excuse to cancel visits.
17. Ms. Tuttle-Durrstein has failed to meet obligations in the divorce agreement while demanding me to do much more than is required.
18. I have attempted to get along with Ms. Tuttle-Durrstein and gone above the court requirements only to have those attempts turn on me.
19. Ms. Tuttle-Durrstein takes the children to bars to visit thier alcoholic grandfather.
20. Further, affiant saith naught.


QUENTIN DURRSTEIN

Sworn to before me, a notary public in and for state and county and subscribed in my presence this 29 day of April, 2004.


NOTARY PUBLIC

AMBER AIVALOTIS, Notary Public
In and for the State of Ohio
My Commission Expires Nov. 9, 2008