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2004 JUL 13 AM 8:08

TERRI A. NAZUR, 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
SSN: 294-66-0508 DOB: 02/18/70

Plaintiff,

vs.

MARIE A. TUTTLE-DURRSTEIN

1844 Pacer Ave.
Dayton, Ohio 45424
SSN: 278-84-5077 DOB: 04/28/76

Defendant.

CASE NO. 02-DR-207

JUDGE HURLEY

MOTION TO SHOW CAUSE

.....
BRANCH I

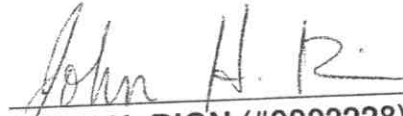
Now comes the Plaintiff, **QUENTIN DURRSTEIN**, by and through his attorneys, **RION, RION & RION, L.P.A., INC.**, and hereby respectfully moves this Honorable Court to order Defendant to show cause why she should not be held in contempt of this Court for her failure to abide by this Court's previous order, 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 to Order the Defendant to reimburse the Plaintiff for his attorney fees and costs for the pursuit of this matter.

An Affidavit is attached hereto.
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 West Second Street
P.O. Box 10126
Dayton, Ohio 45402
(937) 223-9133

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the Attorney for the Defendant, Joseph Stadnicar, 3836 Dayton-Xenia Rd., Beavercreek, Ohio 45432 on the same day of filing.



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

AFFIDAVIT OF QUENTIN DURRSTEIN

STATE OF OHIO)
) SS:
COUNTY OF MONTGOMERY)

Now comes, **QUENTIN DURRSTEIN**, who being first duly cautioned and sworn, deposes and states from his own personal knowledge as follows:

1. I am the father of Ford Allen Durrstein, born 08/15/1998, and Justice Christina Durrstein, born 03/10/1995.
2. My ex-wife, Marie A. Tuttle-Durrstein has denied me parenting time on May 19, 2004; May 26, 2004; May 28-30, 2004; June 2, 2004; June 9, 2004; June 11-23, 2004; June 19-20, 2004.
3. Further, my ex-wife has informed the visitation center that she is cancelling all visitation.
4. 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 22nd day of June, 2004.


NOTARY PUBLIC

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