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September 25, 2023

**VIA ECF**

The Honorable Katherine Polk Failla  
Thurgood Marshall United States Courthouse, Courtroom 618  
40 Foley Square  
New York, NY 10007

**LETTER MOTION FOR ENTRY OF INTERIM CONSENT ORDER**

Re: *Sophie Belinda Turner v. Joseph Adam Jonas*  
Case No. 1:23-cv-08349-KPF

Dear Judge Failla:

This case is before the Court on the Verified Petition for Return of Children to England (the “Petition”) (Doc. No. 1) filed by the Petitioner, Sophie Belinda Turner (the “Mother”). The responsive pleading of the Respondent, Joseph Adam Jonas (the “Father”) is not yet due. The case is scheduled for an initial pretrial conference on October 3, 2023.

The parties have agreed to the entry of the attached proposed Interim Consent Order, without prejudice to either party’s claims and defenses, prohibiting the removal of the parties’ children from the jurisdictions of the United States District Courts for the Southern & Eastern Districts of New York pending further order of this Court. This Court has the authority, in furtherance of article 7(b) of the Hague Convention to “. . . take or cause to be taken measures under Federal or State law, as appropriate, to protect the well-being of the child involved or to prevent the child’s further removal or concealment before the final disposition of the petition.” 22 U.S.C. § 9004(a); *see also* Hague Convention, art. 7(a). The Mother therefore respectfully requests that the Court enter the proposed Interim Consent Order submitted herewith.

Respectfully,

/s/ Kelly A. Powers  
Stephen J. Cullen, *Pro Hac Vice*  
Kelly A. Powers, *Pro Hac Vice Pending*  
Miles & Stockbridge P.C.

The Honorable Katherine Polk Failla  
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*Attorneys for Petitioner*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25th day of September, 2023, a copy of the foregoing Letter Motion for Entry of Interim Consent Order was electronically filed and that it is available to all counsel of record for viewing and downloading from the ECF system.

/s/ Kelly A. Powers  
Kelly A. Powers, *Pro Hac Vice Pending*

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOPHIE BELINDA TURNER

\*

Petitioner,

\*

v.

\*

Case No. 1:23-cv-08349-KPF

JOSEPH ADAM JONAS

\*

Respondent.

\*

\* \* \* \* \*

INTERIM CONSENT ORDER

**The Convention on the Civil Aspects of International Child Abduction, done at The Hague on October 25, 1980; International Child Abduction Remedies Act, 22 U.S.C. 9001 et seq.**

Before the Court is the Verified Petition for Return of Children to England (the “Petition”) filed by the Petitioner, Sophie Belinda Turner (the “Mother”). The responsive pleading of the Respondent, Joseph Adam Jonas (the “Father”) is not yet due. This Interim Consent Order makes no determination on the merits of the Petition, or on either party’s respective claims and defenses, and is entered without prejudice to either party’s position. Upon the consent of both parties, as indicated by the signatures of their respective counsel below, it is:

**ORDERED**, that the Mother and Father are prohibited from removing their two children, WRJ, born in 2020, and DMJ, born in 2022 (collectively, the “children”), or causing the children to be removed from the jurisdictions of the United States District Courts for the Southern & Eastern Districts of New York pending further order of this Court.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
District Judge  
United States District Court for the  
Southern District of New York

**APPROVED AS TO FORM AND CONTENT:**

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