

1
2 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
3 **FOR THE COUNTY OF LINN**

4			
5	In the Matter of:)	
6)	
7	KYLA MAZHARY-CLARK,)	Case No. 19DR03123
8)	
9	Petitioner,)	
10)	MOTION TO SET ASIDE GENERAL
11	and)	JUDGMENT OF PSYCHOLOGICAL
12)	PARENT CUSTODY; and in the alternative
13	JAMIE CLARK,)	MOTION FOR ORDER TO SHOW CAUSE
14)	RE MODIFICATION OF JUDGMENT
15	Respondent,)	
16)	
17	and)	(Hearing Requested on Motion to Set Aside
18)	General Judgment: 2 hours)
19	KENNETH CLARK,)	
20)	
21	Respondent.)	
22	_____)	

23
24 Comes now Respondent, Jamie Clark (“Mother”), appearing by and through her attorney,
25 Lance D. Youd, and moves this court for an order setting aside the Order of Default entered
26 herein on June 25, 2019, and the General Judgment of Psychological Parent Custody (ORS
27 109.119) entered herein on August 14, 2019 for the reasons set forth in the Affidavit of
28 Respondent being filed herewith, or in the alternative for an order modifying the custody
29 provisions of the General Judgment of Psychological Parent Custody (ORS 109.119).

30
31 **MOTION RE: ORCP 71**
32

33 The Order of Default and Judgment entered herein should be set aside on the basis of
34 mistake, inadvertence, surprise, or excusable neglect, pursuant to ORCP 71B(1)(a); fraud,
35 misrepresentation, or other misconduct of Petitioner, pursuant to ORCP 71B(1)(c); the judgment
36 is void with the Court not having had jurisdiction of the children based upon the Uniform Child

1 Custody Jurisdiction and Enforcement Act, pursuant to ORCP 71B(1)(e); and for other good
2 reasons, pursuant to ORCP 71(C).

3
4 **FAILURE TO ACCOMPLISH SERVICE OF PROCESS**

5 Petitioner failed to accomplish service of process on Respondent. ORCP 7D(3) states
6 that service is to be made upon “an individual defendant, by personal delivery of true copies of
7 the summons and the complaint to the defendant or other person authorized by appointment or
8 law to receive service of summons on behalf of the defendant, by substituted service, or by office
9 service.” If the person is neither a minor nor incapacitated person, service can also be made by
10 mailing by first class mail together with mailing by any of the following: certified, registered, or
11 express mail with return receipt requested provided the defendant signs a receipt for the certified,
12 registered, or express mailing. ORCP 7D(3) and ORCP 7D(2)(d)(i). The above-listed methods
13 are to be used for service on an individual unless the Court allows service by other method
14 pursuant to ORCP 7D(6). ORCP 7D(6) allows alternative means of service “[w]hen it appears
15 that service is not possibly under any method otherwise specified in these rules or other rule or
16 statute.” The party must file with the court a motion supported by an affidavit or declaration to
17 request a discretionary court order to allow alternative service by any method or combination of
18 methods that, under the circumstances, is most reasonably calculated to apprise the defendant of
19 the existence and pendency of the action. If the plaintiff knows or with reasonable diligence can
20 ascertain the defendant’s current address, the plaintiff must mail true copies of the summons and
21 the complaint to the defendant at that address by first class mail and any of the following:
22 certified, registered, or express mail, return receipt requested. If the plaintiff does not know, and
23 with reasonable diligence cannot ascertain, the current address of any defendant, the plaintiff
24 must mail true copies of the summons and the complaint by the methods specified above to the
25 defendant at the defendant’s last known address. If the plaintiff does not know, and with
26 reasonable diligence cannot ascertain, the defendant’s current and last known address, a mailing
27 of copies of the summons and complaint is not required.

28 Certainly, posting copies of the summons and petition on a board in the Linn County
29 Courthouse is not the means of service, under the circumstances, that was most reasonably
30 calculated to apprise Mother of the existence and pendency of this action. Petitioner made no
31 effort in the affidavit she filed with the Court on April 23, 2019, to explain why posting was the
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1 method most reasonably calculated to apprise Mother of the existence and pendency of this
2 action, except to state, “I am attempting to serve both Respondents in this matter and I am unable
3 to afford the cost to publish the summons in a newspaper in both Linn and Lane County.”
4 Petitioner’s lack of ability to afford publication in a newspaper does not have anything to do with
5 whether posting is the method most reasonably calculated to apprise Mother of the existence and
6 pendency of this action. The cost of publication is irrelevant. The Court should also note that
7 Petitioner apparently believed publication would be necessary in Linn and Lane County and
8 failed to advise the Court of the cost of publication.

9 It is apparent from the Affidavit of Attempted Service signed by Shawn W. Blehm that
10 Mr. Blehm was able to make contact with Mother. Mr. Blehm’s affidavit states, “I attempted to
11 call Ms. Clark to attempt to meet her in person but she would not disclose her location or agree
12 to meet.” Mr. Blehm did not state whether he advised Mother that he intended to serve her with
13 legal paperwork regarding the custody of her children. Neither did Mr. Blehm state whether he
14 texted Mother regarding his intention to serve her with legal paperwork regarding the custody of
15 her children. Petitioner’s also was able to make contact with Mother. Petitioner’s affidavit
16 states, “I have attempted to contact Ms. Clark, and her fiancé, Kayla Turvey, but have received
17 no response besides ‘Stop contacting me.’” Petitioner did not state whether she advised Mother
18 that she intended to serve her with legal paperwork regarding the custody of her children.
19 Neither did Petitioner state whether she texted Mother regarding her intention to serve her with
20 legal paperwork regarding the custody of her children. Neither did Petitioner or Mr. Blehm state
21 whether they had texted a copy of a Summons and the Petition filed in these proceedings.
22 Neither did Petitioner or Mr. Blehm state whether they had posted a copy of a Summons and the
23 Petition filed in these proceedings on Mother’s social media sites. Being blocked from seeing
24 Mother’s or her finance’s profiles on social media platforms does not mean that she is blocked
25 from posting a Summons and copy of the Petition. Neither did Petitioner put on any evidence of
26 her efforts to contact Mother through family or friends, or through the normal methods of
27 contacting telephone and utility providers.

28 Having obtained the Court’s permission to serve Mother by alternative means, Petitioner
29 then failed to complete service on Mother. Petitioner failed to mail a Summons and the Petition
30 to Mother at her last known address by first class mail and by either certified, registered, or
31 express mail with return receipt requested.

1 Petitioner failed to accomplish service of process on Mother and the Order of Default and
2 Judgment entered herein should be dismissed.

3
4 **LACK OF JURISDICTION OVER THE CHILDREN**

5 At the time Petitioner filed the Petition herein, the Court did not have jurisdiction over
6 the children pursuant to the Uniform Child Custody Jurisdiction and Enforcement Act. ORS
7 109.741 (Initial child custody jurisdiction) states,

8 (1) Except as otherwise provided in ORS 109.751 (Temporary emergency jurisdiction), a
9 court of this state has jurisdiction to make an initial child custody determination only if:

10 (a) This state is the home state of the child on the date of the commencement of
11 the proceeding, or was the home state of the child within six months before the commencement
12 of the proceeding and the child is absent from this state but a parent or person acting as a parent
13 continues to live in this state;

14 (b) A court of another state does not have jurisdiction under subsection (1)(a) of
15 this section, or a court of the home state of the child has declined to exercise jurisdiction on the
16 ground that this state is the more appropriate forum under ORS 109.761 (Inconvenient forum) or
17 109.764 (Jurisdiction declined by reason of conduct), and:

18 (A)The child and the child’s parents, or the child and at least one parent or
19 a person acting as a parent, have a significant connection with this state other than mere physical
20 presence; and

21 (B)Substantial evidence is available in this state concerning the child’s
22 care, protection, training and personal relationships;

23 (c) All courts having jurisdiction under subsection (1)(a) or (b) of this section
24 have declined to exercise jurisdiction on the ground that a court of this state is the more
25 appropriate forum to determine the custody of the child under ORS 109.761 (Inconvenient
26 forum) or 109.764 (Jurisdiction declined by reason of conduct); or

27 (d) No court of any other state would have jurisdiction under the criteria specified
28 in subsection (1)(a), (b) or (c) of this section.

29 (2) Subsection (1) of this section is the exclusive jurisdictional basis for making a child
30 custody determination by a court of this state.

1 (3) Physical presence of, or personal jurisdiction over, a party or a child is not necessary
2 or sufficient to make a child custody determination. [1999 c.649 §13]

3 Sage Clark was born on June 2016 and Sadie Clark was born in July 2017. The children
4 lived in Oregon, until they moved with Mother to Champaign, Illinois, in January, 2018. The
5 children then lived with Mother in Illinois for a period of 10 months, until November 5, 2018.
6 On November 5, 2018, the children flew to Oregon with Petitioner with the understanding that
7 Mother would follow to Oregon after packing and having a friend driver her to Oregon with a U-
8 Haul truck. Petitioner filed her Petition herein on February 12, 2019, only three months after the
9 children returned to Oregon. At the time this proceeding was filed, Illinois continued to be the
10 “home state” of the child and the court did not have jurisdiction to make an initial custody
11 determination in this state.

12
13 **PETITIONER MISLED MOTHER TO BELIEVE SHE HAD “GUARDIANSHIP” OF**
14 **THE CHILDREN, WHEN SHE RETURNED TO OREGON**

15
16 When Mother returned to Oregon on November 15, 2018, 10 days after allowing
17 Petitioner to assist her by flying with the children from Illinois to Oregon, Petitioner advised
18 Mother that Petitioner had “guardianship” of the children and that Mother would have to work
19 with Petitioner on a parenting plan for Mother to see her children. Mother, who knew Petitioner
20 worked in the legal field at the time (and is now an attorney), believed Petitioner. She also
21 believed Petitioner because Petitioner had Mother sign some kind of temporary power of
22 attorney that she believed may have subjected her to some type of legal proceeding. At that
23 point in time, Petitioner did not have guardianship and had not filed any paperwork in court
24 regarding the children. Mother struggled to get Petitioner to allow Mother to see her own
25 children, without a court order in place, for two and one-half months, until February 4, 2019. On
26 February 4, 2019, Mother learned that Petitioner had never filed any legal paperwork in court
27 and that temporary powers of attorney could be terminated at any point in time. Mother,
28 therefore, during “parenting time” allowed by Petitioner, advised Petitioner that she was aware
29 Petitioner did not have custody of her children and that she would be keeping the children.
30 Mother advised Petitioner not to come back to her home and that Petitioner had no legal right to
31 Respondent’s children. On that date, Petitioner returned to Respondent’s residence and
32 attempted to enter Respondent’s residence without permission. She proceeded to pound on
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1 Mother's locked door. To protect herself, Mother called the Albany Police Department.
2 Petitioner was advised by a police officer that she unless she had a court ordered document
3 saying she had rights to the children, there was nothing the officer could enforce. Attached
4 hereto as "Exhibit 101" is a copy of the Event Report from the Albany Police Department. 10
5 days later, on February 14, 2019, Petitioner filed her Petition with the Court together with a
6 Motion for Temporary Protective Order of Restraint (Ex-Parte). Petitioner falsely reported in her
7 Affidavit in Support of Application and Temporary Protective Order of Restraint that the
8 children had lived with her from November 4, 2018 to the present. She failed to advise the Court
9 that the children had lived with Mother from February 4, 2019 until she filed her paperwork with
10 the Court on February 14, 2021.

11
12 **PETITIONER FAILED TO DISCLOSE TO THE COURT THAT MOTHER HAD**
13 **THE CHILDREN IN HER CARE FOR THE 10 DAYS PRIOR TO FILING THE**
14 **PETITION AND MOTION FOR TEMPORARY PROTECTIVE ORDER OF**
15 **RESTRAINT HEREIN**
16

17 As stated above, Petitioner falsely reported in her Affidavit in Support of Application and
18 Temporary Protective Order of Restraint that the children had lived with her from November 4,
19 2018, to the present. She failed to advise the Court that the children had lived with Mother from
20 February 4, 2019, until she filed her paperwork with the Court on February 14, 2021.

21
22 **PETITIONER PROVIDED THE COURT WITH FALSE INFORMATION**
23 **THROUGHOUT THE PAPERWORK SHE FILED WITH THE COURT**
24

25 In her Affidavit in Support of Application and Temporary Protective Order of Restraint,
26 Petitioner advised the Court that she provided care to the children throughout 2017. Petitioner
27 and Mother did live together in the early months of 2017. However, in April, 2017, Petitioner
28 moved out of the apartment. Petitioner did not have care of the children again until she assisted
29 Mother in returning with the children to Oregon, on November 5, 2018.

30 In her Affidavit in Support of Application and Temporary Protective Order of Restraint,
31 Petitioner advised the Court that she taught the children sign language. The children are not deaf
32 and do not use sign language. As with most young children, Mother taught the children a few
33 phrases by sign language to help them communicate.

1 In her Affidavit in Support of Application and Temporary Protective Order of Restraint,
2 Petitioner advised the Court that before the children were in her care the children bounced
3 around to different addresses with their Mother and were placed in foster care for a period of
4 time. The children were not bounced around and the children were never in foster care.

5 In her Affidavit in Support of Application and Temporary Protective Order of Restraint,
6 Petitioner advised the Court that I had to leave Illinois because I was being evicted from an
7 apartment. I was not being evicted from an apartment.

8 In her Affidavit in Support of Application and Temporary Protective Order of Restraint,
9 Petitioner advised the Court that since Mother returned to Oregon Mother had exercised sporadic
10 parenting time, that she was disinterested in the children, and that Petitioner had regularly
11 attempted to facilitate time between Mother and the children by having the minor children
12 regularly call Mother and offer parenting time to Mother. As Exhibit 101 demonstrates, Mother
13 had been led to believe Petitioner had custody/guardianship of her children, Petitioner had
14 controlled Mother's time with her own children, and when Mother realized what was happening
15 she took the children back. Mother expects the Court would have approached this matter
16 differently had the Court known of Petitioner's deception and Mother's efforts to recover her
17 children.

18
19 **MOTHER CONTINUED TO HAVE THE CHILDREN AND HIDE FROM PETITIONER**
20 **IN AN EFFORT TO PROTECT THE CHILDREN**
21

22 Mother continued to have custody and care of the children from February 4, 2019, when
23 she had obtained them with the assistance of the Albany Police Department. In November, 2019,
24 9 months after having resecured the care of her children, Petitioner contacted Mother through a
25 friend. Petitioner apologized for what had happened and convinced Mother that she truly was
26 sorry and wanted to be friends. In December, 2019, Mother agreed to allow Petitioner to have
27 the children for two months (January and February, 2020) while she dealt with a situation
28 involving a stalker. When asked how Mother could trust Petitioner, Petitioner assured Mother
29 that Mother had not signed anything this time so there was no way she could keep the children
30 from her. Please see "Exhibit 102" attached hereto. When Mother attempted to retrieve the
31 children from Petitioner, Petitioner refused to respond to telephone calls, text messages, or
32 Mother knocking at her door. Mother called the police and they responded. Petitioner showed
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1 the police the judgment she had obtained in this proceeding. That was the first time Mother was
2 aware any paperwork had been filed by Petitioner.

3
4 **MOTHER DID NOT KNOW WHAT TO DO TO OBTAIN THE RETURN OF HER**
5 **CHILDREN**
6

7 Mother has felt helpless to obtain the return of her children and did not have the financial
8 means to obtain counsel to advise her regarding her rights. On June 11, 2021, Mother filed a
9 Motion for Order to Vacate Order of Default herein. Mother is not an attorney and did not know
10 of the requirement to file a Response to the Petition filed by Petitioner. ORCP 71 does not make
11 this requirement altogether clear, stating “A motion for reasons (a), (b), and (c) shall be
12 accompanied by a pleading or motion under Rule 21 A which contains an assertion of a claim or
13 defense.” On October 2, 2021, Mother filed a second Motion for Order to Vacate Order of
14 Default. Again, Mother failed to file a Response to the Petition filed by Petitioner.

15
16 **THE RELIEF GRANTED IN THE DEFAULT JUDGMENT VARIES SIGNIFICANTLY**
17 **FROM THE RELIEF REQUESTED IN THE PETITION**
18

19 The relief granted in the default General Judgment language varies significantly from the
20 relief requested in the Petition filed herein. Paragraph 6 of the Petition for Psychological Parent
21 Custody filed by Petitioner states that Mother should be awarded “parenting time with the
22 children as is reasonable under the circumstances.” It appears a judgment was filed with the
23 Court not allowing for any parenting time with Mother: The Court sent Petitioner a Notice of
24 Problems with Documents on August 8, 2019, stating “A motion for judgment in lieu of hearing
25 and a declaration stating why no parenting time for the mother is reasonable under the
26 circumstances needs to be submitted.”

27 In response to the Court’s notice, Petitioner filed a Motion for Entry of Judgment
28 Without a Hearing and a Declaration of Petitioner. Without any evidence to support her
29 allegations and without serving Mother with the paperwork making the allegations, Petitioner
30 states “Respondent Jamie Clark has mental health issues which are not currently being treated
31 and which limit her ability to safely care for Sage and Sadie. Prior to me obtaining guardianship
32 of Sage and Sadie, the children were previously put in foster care in Illinois based on Jamie
33 Clark’s mental health issues, abuse and neglect of the children and inability to protect the
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1 children from abuse and neglect from her romantic partners. Additionally, there is an open DHS
2 investigation regarding Jamie's ability to safely parent Sage and Sadie. Jamie Clark has failed to
3 remedy factors which placed the children in danger. I do not believe Jamie Clark should have
4 parenting time with Sage and Sadie until such time as she undergoes an independent psychiatric
5 or psychological evaluation to determine if she is suicidal, homicidal, or has any diagnosable
6 mental health, psychological, or psychiatric issues that could impair her ability to parent or have
7 supervised parenting time with Sage and Sadie."

8 None of the above-stated allegations are true, including, but not limited to the allegations
9 that Respondent had mental health issues that were not being treated, that the children had been
10 in foster care in Illinois, and that Mother needs a psychological evaluation to determine whether
11 she is suicidal, homicidal, or has other mental health issues.

12 Petitioner went on to set forth further findings of fact in the General Judgment that did
13 not match the language of the Petition:

- 14 • Paragraph (2)(g)(3) states "Respondent Jamie Clark has unreasonably denied contact
15 between Petitioner and the minor children since the filing of this action."
- 16 • Paragraph (2)(g)(4) states "Petitioner has fostered and encouraged a relationship between
17 the minor children and Respondent Jamie Clark when appropriate and safe for the minor
18 children."
- 19 • Paragraph (2)(g)(6) states "Respondent Jamie Clark has placed the children in imminent
20 danger of physical or emotional harm."

21 The General Judgment did not award Mother any parenting time, while the Petition
22 clearly stated Mother should be awarded parenting time until undergoing an independent
23 psychological evaluation to determine if she is suicidal, homicidal or has any diagnosable mental
24 health, psychological, or psychiatric issues that could impair her ability to parent or have
25 supervised parenting time with the minor children. See paragraph (3)(b) of the General
26 Judgment. Paragraphs (3)(c), (3)(d), (3)(e), and (3)(g) of the General Judgment further order
27 requirements surrounding the psychological evaluation for which Petitioner did not pray in the
28 Petition and which require all types of mental health and medical disclosures, and simply not
29 called for. Paragraph (3)(f) of the General Judgment further orders Mother to participate in a
30 parenting class.

1
2 **MOTION FOR ORDER TO SHOW CAUSE RE MODIFICATION OF JUDGMENT**
3

4 In the alternative, Respondent moves the Court for an order requiring Petitioner to appear
5 and show cause why the General Judgment of Psychological Parent Custody (ORS 109.119)
6 entered herein on August 15, 2019, should not be modified as follows:
7

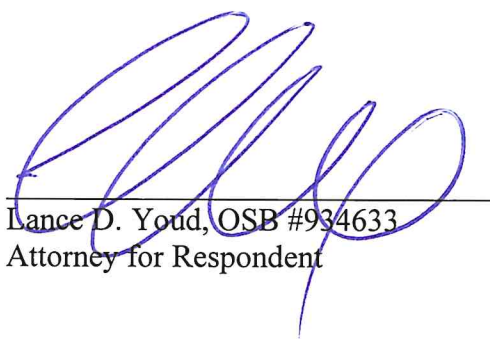
8 1.
9

10 Awarding Respondent custody of Sage and Sadie Clark. If custody is not modified,
11 parenting time should be modified as is in the best interest of the children.
12

13 2.
14

15 Awarding Respondent her attorney fees and costs incurred herein, pursuant to ORS
16 107.119.
17

18 Dated this 5 day of January 2022.
19

20
21
22 
23 Lance D. Youd, OSB #934633
24 Attorney for Respondent

Event Report

Event ID: 2019-012839

Call Ref #: 189

Date/Time Received: 02/04/2019 18:05:45

Rept #:	Call Source : PHONE	Prime Unit: 177 HEDRICK, BREANNA	Service Involved			
			LAW			

Location: 125-26 EXPO PKWY NE					
X-ST: KNOX BUTTE RD NE					
Business: KNOX BUTTE RV PARK		Phone:	Jur: CAD	Service: LAW	Agency: APD
			St/Beat: NE	District: ANE	RA: ALB

Nature: CIVIL DISPUTE REPORT	Alarm Lvl: 1	Priority: 3	Medical Priority:
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Caller: CLARK, JAMIE LEIGH FAITH		Alarm:	Call Taker: JESSICAK
Addr:	Phone: (541) 714-0527	Alarm Type:	Console: DISP4

Vehicle:	St:	Report Only: No	Race:	Sex:	Age:
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Geo-Verified Addr: Yes	Nature Summary Code:	Disposition: CAD	Close Comments:
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Notes: 129- I DROVE THROUGH THE AREA AGAIN AND DID NOT LOCATE ANYONE. I CONTACTED PR AND ADVISED HER THAT IF HER EX RETURNS TO CONTACT THE PD [02/04/19 18:51:17 Unit:129]
 177/NW: I spoke with Jamie on the phone. She told me there was an agreement between her and Kya that Kya would watch her two children in Oregon while she finished school in Illinois. Jamie said once she returned to Oregon she got the girls back but stated Kya was now at the front door to get the girls. I asked Jamie if the agreement they made was a court ordered document that had been signed by a judge, she told me it was not. After speaking with Jamie I called Kya and informed her that unless there was a court ordered document saying she had rights to the children there was nothing we could enforce. I told her that if there were legitimate concerns about the safety of the girl that she could go to the courts and speak with them about her rights, she told me she would. [02/04/19 18:50:17 Unit:177]
 5033290995 [02/04/19 18:44:32 Unit:129]
 pr called back...s is still outside of her house [02/04/19 18:25:29 JESSICAK]
 pr is not interested in trespass charges, just wants her to leave and not return. [02/04/19 18:10:00 JESSICAK]
 s arrived in a vehicle..normally drives a blue car 4dr. [02/04/19 18:09:28 JESSICAK]
 s has never lived at the location. the s has been trying to get custody of the kids but they have not been to court yet. [02/04/19 18:08:32 JESSICAK]
 pr's ex is at the location trying to take the pr's children.. the kids are the pr's bio children. 1 year old and 2 year old. the s knocked on the door, the pr opened it to see who it was and the s tried to force her way inside. s - kyla mazhary-clark [02/04/19 18:08:08 JESSICAK]

Times

Call Received: 02/04/2019 18:05:45	Time From Call Received	Unit Reaction: 000:00:00 (1st Dispatch to 1st Arrive)
Call Routed: 02/04/2019 18:08:08	000:02:23	En-Route: 000:00:00 (1st Dispatch to 1st En-Route)
Call Take Finished: 02/04/2019 18:08:08	000:02:23	On-Scene: 000:13:12 (1st Arrive to Last Clear)
1st Dispatch: 02/04/2019 18:42:21	000:36:36 (Time Held):	
1st En-Route: 02/04/2019 18:42:21	000:36:36	
1st Arrive: 02/04/2019 18:42:21	000:36:36 (Reaction Time):	
Last Clear: 02/04/2019 18:55:33	000:49:48	

Radio Log

Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
129	56353	E	En-Route	02/04/2019 18:42:21	Stat/Beat: APD		MORGANF
129	56353	D	Dispatched	02/04/2019 18:42:21	Stat/Beat: APD		MORGANF
129	56353	A	Arrived	02/04/2019 18:42:21	Stat/Beat: APD		MORGANF
177	55200	D	Dispatched	02/04/2019 18:46:29	Stat/Beat: NW;189		JESSICAK
177	55200	C	Cleared	02/04/2019 18:50:32	[CAD]	CAD	BREANNAH
129	56353	C	Cleared	02/04/2019 18:55:33	[AU]	AU	MORGANF

EXHIBIT
 101
 of

Event Log							
Unit	Empl ID	Type	Description	Time Stamp	Comments	Close Code	User
		TR	Time Received	02/04/2019 18:05:45	By: PHONE		JESSICAK
		DLS	Duplicate List	02/04/2019 18:05:59	Potential Duplicate Events Listed (1		JESSICAK
		ENT	Entered Street	02/04/2019 18:06:01	125 EXPO PKWY NE		JESSICAK
		DLS	Duplicate List	02/04/2019 18:06:05	Potential Duplicate Events Listed (1		JESSICAK
		CHG	Changed Street	02/04/2019 18:06:06	125 EXPO PKWY NE -> 125-26 EXPO PKWY NE		JESSICAK
		ENT	Entered Nature	02/04/2019 18:06:13	CIVIL DISPUTE REPORT		JESSICAK
		ENT	Entered Remarks	02/04/2019 18:08:08			JESSICAK
		FIN	Finished Call Taking	02/04/2019 18:08:08			JESSICAK
		ARM	Added Remarks	02/04/2019 18:08:32			JESSICAK
		ENT	Entered CallerName CallIn	02/04/2019 18:08:39	CLARK, JAMIE		JESSICAK
		ENT	Entered CallerPhone	02/04/2019 18:08:50	5417140527		JESSICAK
		ENT	Entered CallerAge	02/04/2019 18:09:06	[ID: 431677] 26		JESSICAK
		ENT	Entered CallerDob	02/04/2019 18:09:06	[ID: 431677] 02/05/1992		JESSICAK
		ARM	Added Remarks	02/04/2019 18:09:28			JESSICAK
		ARM	Added Remarks	02/04/2019 18:10:00			JESSICAK
		ENT	Entered Caller Name	02/04/2019 18:11:13	CLARK, JAMIE LEIGH		JESSICAK
		CHG	Changed Caller Name	02/04/2019 18:11:17	LEIGH-->CLARK, JAMIE LEIGH FAITH		JESSICAK
		ENT	Entered CallerOlnState	02/04/2019 18:11:19	[ID: 431677] OR		JESSICAK
		ENT	Entered CallerOln	02/04/2019 18:11:19	[ID: 431677] 2842541		JESSICAK
		ENT	Entered memoNmComments	02/04/2019 18:11:23			JESSICAK
		ENT	Entered memoNmComments	02/04/2019 18:11:23			JESSICAK
		ARM	Added Remarks	02/04/2019 18:25:29			JESSICAK
		ARM	Added Remarks	02/04/2019 18:44:32			Unit:129
		ARM	Added Remarks	02/04/2019 18:50:17			Unit:177
177	55200	CHG	Changed PrimeUnit	02/04/2019 18:50:21	129 --> 177		BREANNAH
		ARM	Added Remarks	02/04/2019 18:51:17			Unit:129

Related Names														
Last	First	MI	Suffix	Type	Race	Sex	HT	WT	Eyes	DOB	Age	Home Ph	Mobile Ph	Work Ph
CLARK,	JAMIE	LEIGH	FAITH	CALLER		F	502	150		2/5/1992	27	(541) 714-0527		
				Address:	HWY 126 SPC 42 MAPLETON OR 97453									
				State OLN:	OR 2842541									
				Notes:										



Kyla Mazhary-Clark

Active 2h ago

When were you thinking of having me pick them up? I can keep them for as long as they need. I've got everything set up for them still.



What day next week



Let me check but that should work.



Of course. I've missed them so much!

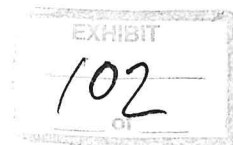
Can you send me their current sizes and anything else I should know?



Do you have current vaccinations you could send a copy of?



Aa



10:42



Kyla Mazhary-Clark

Active 2h ago

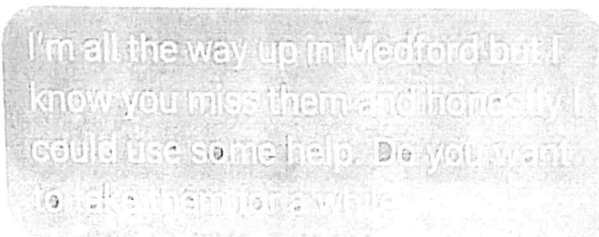
DEC 18, 2019, 3:09 PM



You did????



DEC 18, 2019, 3:41 PM



DEC 19, 2019, 9:37 AM



JAN 20, 2020, 7:43 AM

I'm sorry I haven't gotten back to you in a while. I've had the flu and then a sinus infection and then strep throat. I'm finally functioning again though. How are you? How are the girls?

I miss them so much and of course would love to take them if you need a break.



JAN 20, 2020, 8:46 AM



Aa



10:41



Kyla Mazhary-Clark

Active 2h ago



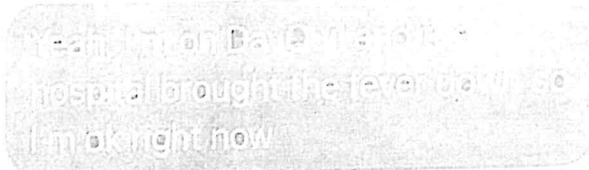
Is everything ok



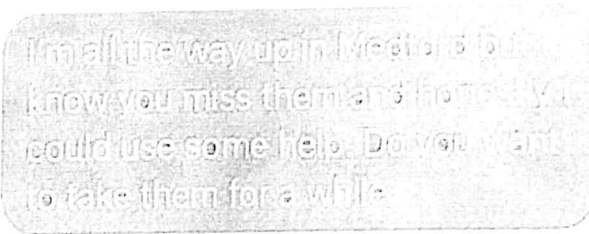
DEC 18, 2019, 3:09 PM



You did????



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Aa




CERTIFICATE OF MAILING and EMAILING
Case No. 19DR03123

I hereby certify that I served a true copy of the foregoing “Respondent’s Motion to Set Aside General Judgment of Psychological Parent Custody; and in the alternative Motion for Order to Show Cause Re: Modification of Judgment,” “Declaration of Respondent in Support of Respondent’s Motion to Set Aside General Judgment of Psychological Parent Custody; and in the alternative Motion for Order to Show Cause Re: Modification of Judgment,” and “Order to Appear and Show Cause (Ex Parte)” on the following parties or their agents or their attorneys on the 9 day of January 2022, by mailing and emailing to each a true copy thereof, which I hereby certify as such, addressed to said parties or their agents or their attorneys at the last-known address of each shown below and deposited in the U.S. Post Office on said day at Salem, Oregon:

Kyla Mazhary-Clark
3442 Liberty Rd. S. #48
Salem, OR 97302

kyla@ivers.law

Dated this 9 day of January 2022.


Lance D. Youd, OSB# 934633
Attorney for Respondent Jamie Clark