	11/6/2023 4:19 PM			
1				
2				
3	IN THE CIRCUIT COURT OF THE STATE OF OREGON			
4	FOR THE COUNTY OF LINN			
5	IN THE MATTER OF	Case No.: 19DR03123		
6	KYLA MAZHARY-CLARK			
7	Petitioner,	PETITIONER'S RESPONSE AND COUNTERCLAIMS TO ORDER TO SHOW		
8	and	CAUSE (SET ASIDE GENERAL JUDGMENT; OR, IN THE ALTERNATIVE		
10	JAMIE CLARK nka CROMPTON,	MODIFY SUPPLEMENTAL JUDGMENT)		
11	Respondent, and			
12 13	KENNETH CLARK,			
14	Respondent.			
15 16	1. COMES NOW Petitioner, by and through her attorney of record, Andrew D. Ivers, and			
17	responds to Respondent's Order to Show Cause (Set Aside General Judgment; or, in the			
18	alternative Modify Supplemental Judgment) as follows:			
19	(1)(a) Denies the allegations contained in Respondent's Ex Parte Motion & Declaration			
20	for Order to Show Cause (Set Aside General Judgment; or, in the alternative			
21	Modify Supplemental Judgment) in their entirety.			
22	///			
23				
24	///			
25	///			
	PETITIONER'S RESPONSE AND COUNTERCLAIMS TO ORDER TO SHOW CAUSE (SET ASIDE GENERAL JUDGMENT; OR, IN THE ALTERNATIVE MODIFY SUPPLEMENTAL JUDGMENT) - 1 LAW OFFICE OF IVERS, MILLER & MAZHARY-CLARK 317 FIRST AVE W, SUITE 302, PO BOX 1033 ALBANY, OR 97321 • TELEPHONE (541) 928-5875 FAX (541) 967-9730			

1		2	
	×	2.	
2	In Count	termotion, Petitioner, Kyla Mazhary-Clark, requests that Respondent Jamie	
3	Crompton a	ppear and show cause, if any she has, why the Supplemental Judgment Modifying	
4 5	Parenting Time, entered on June 26 th , 2023, should not be modified as follows:		
6	(2)(a)	Awarding Respondent Jamie Crompton parenting time with the minor children	
7		pursuant to Supplemental Judgment Modifying Parenting Time, entered on June	
8		26 th , 2023, with supervision by a paid parenting time supervisor or a caseworker	
9		with the Department of Human Services.	
10 11	(2)(b)	Requiring Respondent Jamie Crompton to pay child support to Petitioner in	
12		accordance with the Oregon Division of Child Support Guidelines as determined	
13		OAR 137-050-0700 et seq.	
14	(2)(c)	Requiring Respondent Jamie Crompton to pay Petitioner's reasonable attorney	
15		fees and costs incurred herein pursuant to the provisions of ORS 107.119(7).	
16 17	DATED this day of November, 2023.		
18			
19		Andrew D. Ivers, OSB #050664 Attorney for Petitioner	
20		andy@ivers.law	
21			
22			
23			
24			
25			
	·)	R'S RESPONSE AND COUNTERCLAIMS TO ORDER TO SHOW CAUSE (SET ASIDE UDGMENT; OR, IN THE ALTERNATIVE MODIFY SUPPLEMENTAL JUDGMENT) - 2 Law office of ivers, miller & mazhary-clark 317 first ave w, suite 302, po box 1033 Albany, or 97321 Telephone (541) 928-5875 fax (541) 967-9730	

1	Certificate of Service	
2	On the 6 th day of November, 2023, Petitioner's Response was mailed to counsel for Respondent, William Boaz, upon filing the with the Court, at his address of record with the	
3	Oregon State Bar, which reads as follows:	
4	William Boaz P.O. Box 54	
5	Salem, OR. 97308	
6	Dated this $\underline{\frown}$ day of November, 2023.	
7	Dated this <u>/</u> day of November, 2023.	
8	Andrew D. Ivers, OSB #050664	
9	Attorney for Petitioner andy@ivers.law	
10 11		
11		
12		
13		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
	PETITIONER'S RESPONSE AND COUNTERCLAIMS TO ORDER TO SHOW CAUSE (SET ASIDE GENERAL JUDGMENT; OR, IN THE ALTERNATIVE MODIFY SUPPLEMENTAL JUDGMENT) - 3 LAW OFFICE OF IVERS, MILLER & MAZHARY-CLARK 317 FIRST AVE W, SUITE 302, PO BOX 1033 ALBANY, OR 97321 TELEPHONE (541) 928-5875 FAX (541) 967-9730	