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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF LINN

IN THE MATTER OF
KYL A MAZHARY-CLARK

Petitioner,

and

JAMIE CLARK nka CROMPTON,

Respondent,

and

KENNETH CLARK,

Respondent.

Case No.: 19DR03123

PETITIONER'S RESPONSE AND
COUNTERCLAIMS TO ORDER TO SHOW
CAUSE (SET ASIDE GENERAL
JUDGMENT; OR, IN THE ALTERNATIVE
MODIFY SUPPLEMENTAL JUDGMENT)

1.

COMES NOW Petitioner, by and through her attorney of record, Andrew D. Ivers, and responds to Respondent's Order to Show Cause (Set Aside General Judgment; or, in the alternative Modify Supplemental Judgment) as follows:

- (1)(a) Denies the allegations contained in Respondent's Ex Parte Motion & Declaration for Order to Show Cause (Set Aside General Judgment; or, in the alternative Modify Supplemental Judgment) in their entirety.

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PETITIONER'S RESPONSE AND COUNTERCLAIMS TO ORDER TO SHOW CAUSE (SET ASIDE GENERAL JUDGMENT; OR, IN THE ALTERNATIVE MODIFY SUPPLEMENTAL JUDGMENT) - 1

2.

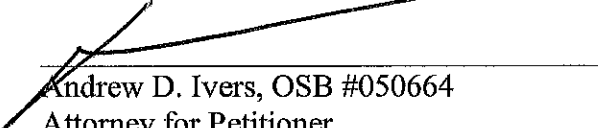
In Counter-motion, Petitioner, Kyla Mazhary-Clark, requests that Respondent Jamie Crompton appear and show cause, if any she has, why the Supplemental Judgment Modifying Parenting Time, entered on June 26th, 2023, should not be modified as follows:

(2)(a) Awarding Respondent Jamie Crompton parenting time with the minor children pursuant to Supplemental Judgment Modifying Parenting Time, entered on June 26th, 2023, with supervision by a paid parenting time supervisor or a caseworker with the Department of Human Services.

(2)(b) Requiring Respondent Jamie Crompton to pay child support to Petitioner in accordance with the Oregon Division of Child Support Guidelines as determined OAR 137-050-0700 et seq.

(2)(c) Requiring Respondent Jamie Crompton to pay Petitioner's reasonable attorney fees and costs incurred herein pursuant to the provisions of ORS 107.119(7).

DATED this 6 day of November, 2023.



Andrew D. Ivers, OSB #050664
Attorney for Petitioner
andy@ivers.law

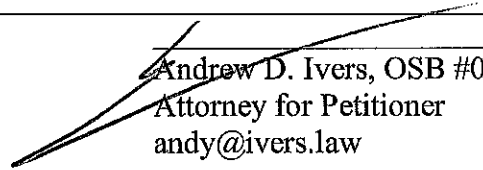
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Certificate of Service

On the 6th 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 Oregon State Bar, which reads as follows:

William Boaz
P.O. Box 54
Salem, OR. 97308

Dated this 6 day of November, 2023.


Andrew D. Ivers, OSB #050664
Attorney for Petitioner
andy@ivers.law