

COURT OF COMMON PLEAS
JUVENILE COURT DIVISION
HAMILTON COUNTY, OHIO

In the Matter of:

LUCY KATHLEEN MULLEN

A Minor

Case No. _____

||
||
||
||
||

FILED
HAMILTON COUNTY
JUVENILE COURT
2007 DEC 20 AM 9:48
JUDGE THOMAS R. LIPPS
JUDGE KAPLAN

**MICHELE HOBBS' MOTION FOR AN ORDER
GRANTING HER VISITATION WITH LUCY KATHLEEN MULLEN**

Michele Hobbs, through her undersigned counsel, hereby moves this Court for an order granting her visitation with the minor child, Lucy Kathleen Mullen, during the pendency of the proceedings regarding Michele Hobbs' Verified Complaint For Shared Custody. In support of this Motion, Michele states:

1. Michele re-alleges and incorporates herein the allegations contained in her Verified Complaint For Shared Custody (the "Complaint"), filed simultaneously herewith.
2. In her Complaint, Michele requests an order granting her shared permanent custody of Lucy, a 28-month child that Michele has raised, and cared for, with her former partner, Kelly Mullen, since the child's birth.
3. Since the weekend of October 27-28, 2007, when Kelly moved out of the couple's home with Lucy, Kelly has refused to allow Michele to see Lucy.
4. By refusing to allow Michele to see Lucy, Kelly is unilaterally attempting to sever the mother-daughter relationship between Michele and Lucy. Such action is not in the child's best interest.

5. Furthermore, Kelly's actions represent an unfair attempt to gain an advantage in the couple's legal dispute. By threatening the bond between Michele and Lucy, Kelly is striking at one of the bases for the relief requested in Michele's Complaint.

WHEREFORE, for the foregoing reasons, Michele Hobbs requests that this Court:

- (a) enter an order, as soon as practicable, granting Michele immediate access to, and visitation with, Lucy Kathleen Mullen during the pendency of these proceedings.

Respectfully Submitted,



Lisa T. Meeks (0062074)
Newman & Meeks Co., L.P.A.
215 East 9th Street
Suite 650
Cincinnati, OH 45202
513-639-7000

Christopher R. Clark (motion to admit *pro hac vice* pending)
Lambda Legal Defense and Education Fund, Inc.
11 East Adams
Suite 1008
Chicago, IL 60603
312-663-4413

Attorneys For Michele Hobbs