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IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

JEROMY L. CUNNINGHAM	)		
	)		
Petitioner,	)	Cause No.	19SL-DR00972-01
	)		
vs.	)	Division	20
	)		
GERALDINE I. CUNNINGHAM	)		
	)		
Respondent.	)		

MOTION TO MODIFY CUSTODY AND SUPPORT

COMES NOW Respondent, Geraldine Cunningham, by and through the undersigned counsel, and for her Motion to Modify, states as follows:

1. On are about January 2, 2020, this Court entered a Judgment and Decree on Dissolution of Marriage (hereinafter "Judgment").

2. Pursuant to the Judgment, the parties were awarded joint legal custody of their minor child [redacted]

3. Pursuant to the Judgment, the parties were awarded joint physical custody of their minor child I.C.

4. In accordance with Section 452.480 RSMo. (Supp. 1994), Respondent states that actual custody of the minor child during the six months immediately preceding the filing of the Motion herein has been with both parties; the minor child now resides with both parties in St. Louis County; neither party has participated in any capacity in any other litigation concerning the custody of the minor child in this State or any other; Respondent has no knowledge or information of any custody proceeding concerning the minor child pending in any Court of this State or any other; and Respondent has no knowledge of any person not a party to this proceeding who has

physical custody of said minor child or claims to have custody or visitation rights with respect to said minor child.

[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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[redacted]

WHEREFORE, Respondent prays this Honorable Court enters an Order Modifying the Judgment of Dissolution of Marriage dated January 2, 2020, awarding Respondent sole legal and sole physical custody of the minor child, and awarding Petitioner limited visitation, modifying child support in accordance with Form 14 and for such and further relief as this court deems just and necessary.

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GERALDINE CUNNINGHAM, Respondent

GERALDINE CUNNINGHAM, being first duly sworn upon her oath, states that she is the Respondent in the above Motion to Modify Custody and Support, that she has read the same, and the facts stated herein are true to the best of her knowledge, information and belief.

GERALDINE CUNNINGHAM, Respondent

STATE OF MISSOURI)
) SS
COUNTY OF ST LOUIS)

On this 10th day of August, 2023, before me personally appeared GERALDINE CUNNINGHAM, to me known to be the person described in and who executed the foregoing instrument and acknowledged that she executed the same as her free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year first above written.

Notary Public
My Term Expires:

MYRA LEARY
Comm. Exp. 06/22/2028
NOTARY PUBLIC NOTARY SEAL
#22725674
St. Louis County
STATE OF MISSOURI

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Respectfully submitted,
McCARTHY, LEONARD & KAEMMERER, L.C.

By: */s/ Laura H. Stobie*

Laura H. Stobie #62154
Attorney for Respondent
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314-392-5221 (fax)
lstobie@mlklaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of August 2023, a true and exact copy of the foregoing was served via e-filing to all parties of record.

/s/ Laura H. Stobie

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