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IN THE TWENTY-FIRST JUDICIAL CIRCUIT COURT
COUNTY OF ST. LOUIS, STATE OF MISSOURI

IN RE: THE MARRIAGE OF:	)	
[redacted]	)	
[redacted],	)	
	)	**Cause No. 08SL-DR01390-03**
Petitioner,	)	
	)	
vs.	)	
[redacted],	)	
	)	
Respondent.	)	

[redacted] OBJECTION TO BUSINESS RECORDS OF [redacted]

Petitioner, [redacted] by and through counsel, Sara L. Marler and Marler Law Partners, for [redacted] Objection to Business Records of [redacted], states as follows:

1. After the first day of trial in [redacted], Respondent [redacted] (hereinafter [redacted] obtained records from [redacted].

2. Said records contain an affidavit from a [redacted] for the organization, but said affidavit fails to comply with the requirements for a business record affidavit contained in § 490.692, RSMo., in that said affidavit does not contain reference to specific numbers of pages or records and only identifies generally [redacted] A copy of said affidavit is attached as Exhibit 1 and incorporated by reference herein.

3. Furthermore, said records are probative in that they are indecipherable and the information contained within cannot be definitively interpreted without the testimony of a witness from [redacted] with specific knowledge regarding each and every document provided.

4. At the present time, [redacted] has not identified the records of [redacted] as a new exhibit as required under this Court's Trial Preparation Order. However, [redacted] submits this objection to preserve [redacted] own compliance with the order in the event such exhibit is offered before the Court.

WHEREFORE, [redacted] respectfully requests that the Court exclude admission of records from [redacted] into evidence in these proceedings, and [redacted] relief as this Court deems just and proper.

Respectfully submitted,

MARLER LAW PARTNERS
Attorneys for Respondent/Mother

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CERTIFICATION OF SIGNED ORIGINAL

The electronic signature(s) of Counsel and/or Party(ies), appearing hereon, does verify that this original document was signed by both Counsel and/or the Party(ies) to this action as prescribed in Mo. R. Civ. Proc. 55.03 and that said original filing shall be maintained by the filer for a time period not less than that specified by said Rule.

/s/ Denise N. Gabel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was electronically filed with the Court on this 4th day of January 2024, and electronic service to all attorneys of record pursuant to Missouri Supreme Court Rule 103.08.

/s/ Denise N. Gabel

Not an Official Court Document