Electronically Filed - ST LOUIS COUNTY - October 06, 2023 - 01:44 PM

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

IN RE: THE MARRIAGE OF:	)	
[redacted]	)	
	)	Cause No. 09SL-DR03797-03
Petitioner,	)	Division 32
v.	)	
[redacted]	)	
Respondent.	)	

MOTION FOR LEAVE TO FILE AMENDED MOTION FOR CIVIL CONTEMPT AND TO SET ASIDE NOTICE OF HEARING SCHEDULED FOR OCTOBER 16, 2023.

[redacted] by and through counsel Denise N. Gabel and Marler Law Partners, requests leave to file [redacted] Second Amended Petition for Dissolution of Marriage, as authorized under Rule 55.33(a), and states as follows:

1. On August 30, 2023, [redacted] pro se, filed his Motion for Civil Contempt with this Court, alleging that Petitioner [redacted] has failed to comply with judgments of the Court in this matter.

2. Undersigned counsel has now entered her appearance on behalf of [redacted] in this matter, and [redacted] requests to leave to file an amended motion, by and through counsel.

3. [redacted] Motion for Civil Contempt is scheduled for a Show Cause Hearing on October 16, 2023.

4. [redacted] has not yet been personally served with [redacted] Motion for Civil Contempt.

5. This request is not meant to cause unnecessary delay.

WHEREFORE, Respondent/[redacted] requests that the Court grant [redacted] 30 days to file [redacted] First Amended Motion for Civil Contempt and Motion for Attorney's Fees, order the Show Cause Hearing scheduled on [redacted] Motion for Civil Contempt on October 16, 2023, to be set aside, and for further relief as this Court deems just and proper.

Respectfully submitted,

MARLER LAW PARTNERS
Attorneys for Respondent/[redacted]

/s/ Denise N. Gabel
DENISE N. GABEL, MBE #58730
dgabel@marlerlawpartners.com
10805 Sunset Office Drive, Ste. 210
Sunset Hills, MO 63127
Phone | (573) 747- 4573

STATE OF MISSOURI)
) **SS.**
COUNTY OF St. Louis)

COMES NOW Respondent, [redacted] being of lawful age and after being duly sworn, states [redacted] has read the foregoing document, and the facts stated therein are true and correct according to the best of [redacted] knowledge, information and belief.

[redacted]

Subscribed and sworn to before me, a Notary Public, this 27 day of September 2023.

Denise Gabel
Notary Public

My Commission Expires:

DENISE GABEL
My Commission Expires
08-22-2025
NOTARY SEAL
St. Louis County
Commission # 21776214
NOTARY PUBLIC - STATE OF MISSOURI

Electronically Filed - ST LOUIS COUNTY - October 06, 2023 - 01:44 PM