STATE OF T		SUI	BPOENA	CIVIL ACTION
DAVIDSON COUNTY   TESTIMONY/PRODUCTION		N REQUIRED (SEE NOTICE BELOW)	DOCKET NO13D-1446	
Circuit Court		MEDICAL RECORDS (SE	E HIPAA REQUIREMENT BELOW)	DOORET HO!
PLAINTIFF			DEFENDANT vs. Angelia Solomon	
Aaron L. Solor		NE NUMBER OF WITNESS)	va. ,g	Method of Service:
Custodian of R		AE MONIDER OF THE COLUMN		Davidson County Sheriff
Merrill Lynch				El a la
5121 Maryland Brentwood, Tel				
Brentwood, Ter	111103300			Out of County Sheriff
		A () - ()	to and place enecified for the	nurpose of giving testimony. In
1 1941 - 26 (		A REDATEM HALLS USIC	d. I dilute to appear may	ourpose of giving testimony. In it is contempt of Court which
could result in	punishment by	fine and/or imprisonm	elit as provided by with	
TIME	DATE		Items to bring:	ation of income/salary/advanced
11:00	June 19, 2014		commissions/bonuses, testing re	esults, cost and availability of
PLACE			health and life insurance and ve copy of first and most recent par	vchecks for Aaron L. Solomon,
		i i	date of birth: March 8, 1969, SS	# xxx-xx-4161.
			Assessed will be waived uno	n receipt of the requested records
Law Office of F	Rogers, Kamm & :	Shea	accompanied by the attached A	ffidavit which has been signed and
2205 State St Nashville, Ten			notarized	
Nashville, Ten	nessee			
		1	Additional List Attached	
	na is being issue	d on benait of	DATE ISSUED:	
Attorney: (NA	AME, ADDRESS & TELE			R. ROOKER
Helen Sfikas f	Rogers		Circuit Court Clerk	
2205 State St				
Nashville, TN (615) 320-060		010	BY:	
ATTORNEY'S SIGN	ATURE: BELLIN	8 Kegen	Di	EPUTY CLERK
DESIGNEE:			To request an ADA accommod	dation, please contact Dart Gore at 880-3309.
	West Total		To request an ADA accommod	
DESIGNEE'S SIGN.		ilead		
1—	ny/Production requ	TESTIMON	Y/PRODUCTION NOTICE	
The failur	re to serve an objec		the day and offer the day	of service of the Subpoena waives all papers, documents, electronically
objections to	the Subpoena, exce	ept the right to seek the les	in twenty-one (21) days after the day asonable costs for producing books, [	papers, documents, electronically
	ation, or tangible th			
Medical I	Records Requeste	d - HIPAA notice require		
			HIPAA NOTICE	or faceimile on the day
-5		20 , so as to allo	I for the patient or the patient by mail w him/her twenty-one (21) days to:	
(A) Serve the recipient of the Subpoena by facsimile with a written objection to the Subpoena, with a copy of the Notice by				
(B) Simultaneously file and serve a Motion for a Protective Order consistent with the requirements of T.R.C.P. 26.03, 26.07 at				
If no objection is made within twenty-one (21) days of the above date, you shall process this Subpoena and produce the documents by the date and time specified in the Subpoena. The signature of counsel or party on the Subpoena is certification that the above Notice was provided to the patient.				
above Notice	e was provided to th	ie pauent.		

## AFFIDAVIT OF CUSTODIAN OF RECORDS

I, the undersigned, being the duly authorized Custodian of Records or other qualified witness for Merrill Lynch and having the authority to certify the records declare the following: The records were prepared in the ordinary course of business at or near the time of the act, condition or event; was kept in the course of regularly conducted activity; and was made by the regularly conducted activity as a regular practice; and that:

(A)	CERTIFICATION OF RECORDS:	
	All records called for in the su been released for documentation	bpoena or authorization are in my custody and have on.
	All records maintained in according pursuant to state and/or federal statute	ordance with our document retention policy and es and regulations are provided.
<b>(B)</b>	CERTIFICATION OF NO RECOI	RDS:
recor	A thorough search of our files, carried ds, or other materials called for in the su	d out under my direction revealed no documents, abpoena or authorization.
	All records for the time period our document retention policy	d in question have been destroyed in accordance with
	A thorough search has been p	performed and no such records were found.
the f	I declare under penalty of perjury oregoing is true and correct.	under the laws of the State of that
	Executed on the day of County, Tennessee.	, 2014,(city),
		Signature:
	(Please Print Name)	
Sub	scribed and sworn to before me this the	day of, 2014.
		Signature: My Commission Expires:
	(Please Print Name)	My Commission Expires:

# IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE AT NASHVILLE

AARON L. SOLOMON,	)
Plaintiff/Husband,	)
	)
VS.	) DOCKET No. 13D-1446
	)
ANGELIA SOLOMON,	)
Defendant/Wife.	)

#### NOTICE OF RECORDS DEPOSITION

To: Custodian of the Records Grace Christian Academy 3279 Southall Road Franklin, Tennessee

PLEASE TAKE NOTICE that Defendant/Wife, Angelia Solomon, by and through her counsel of record, shall take the records deposition of the Custodian of the Records for Grace Christian Academy on June 19, 2014, commencing at 10:00 a.m. and going forward thereafter until completed at the law offices of Rogers, Kamm and Shea, 2205 State Street, Nashville, TN 37203.

Defendant will take this deposition pursuant to Rules 26 and 30 of the *Tennessee Rules of Civil Procedure*. This deposition will be taken before a Notary Public authorized by law to administer oaths. This deposition is for evidentiary purposes and all other purposes Defendant may require pursuant to the *Tennessee Rules of Civil Procedure*.

Please bring with you the following: All school records for 2012-2013 and 2013-14, including but not limited to: grade reports, test scores, disciplinary or behavior notices, notes and any correspondence in the file between Aaron Solomon and the administrators or teachers for the following students: Grant Rhodes Solomon, date of birth: June 13, 2002 and Gracie Rhodes Solomon, date of birth: October 17, 2006.

Personal appearance is waived if records requested by subpoena are produced accompanied by the attached affidavit which has been signed and notarized.

Respectfully submitted,

HELEN SFIKAS ROCERS, #7025

Rogers, Kamm & Shea
Attorneys for Plaintiff/Wife
The Wind in the Willows Mansion
2205 State Street
Nashville, Tennessee 37203

(615) 320-0600 (Telephone)

(615) 320-9933 (Fax)

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the day of day of , 2014, a true and exact copy of the foregoing *Notice of Records Deposition* has been forwarded to the persons listed below:

D. Scott Parsley
Attorney for Plaintiff
Parsley, Parsley & Strickland
219 Second Avenue North, Suite 300
Nashville, TN 37201

by the method identified as follows

U.S. Mail, Postage Prepaid Hand Delivered Overnight Delivery Service

Certified Mail, Return Receipt Requested

Facsimile Email

HELEN SFIKAS ROGE

### AFFIDAVIT OF CUSTODIAN OF RECORDS

I, the undersigned, being the duly authorized Custodian of Records or other qualified witness for Grace Christian Academy and having the authority to certify the records declare the following: The records were prepared in the ordinary course of business at or near the time of the act, condition or event; was kept in the course of regularly conducted activity; and was made by the regularly conducted activity as a regular practice; and that:

(A)	CERTIFICATION OF RECORDS	;
	All records called for in the subsect that the subsect for documentations are subsected as a subsect of the sub	abpoena or authorization are in my custody and have ion.
	All records maintained in according pursuant to state and/or federal statut	ordance with our document retention policy and es and regulations are provided.
(B)	CERTIFICATION OF NO RECO	RDS:
recore	A thorough search of our files, carrieds, or other materials called for in the s	d out under my direction revealed no documents, ubpoena or authorization.
	All records for the time perio our document retention policy	d in question have been destroyed in accordance with y.
	A thorough search has been p	performed and no such records were found.
the f	I declare under penalty of perjury oregoing is true and correct.	under the laws of the State of that
	Executed on the day of County, Tennessee.	, 2014,(city),
		Signature:
,	(Please Print Name)	
Subs	cribed and sworn to before me this the	day of, 2014.
		Signature: My Commission Expires:
	(Please Print Name)	My Commission Expires:





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		//
		2011
IN THE FOURTH CI	RCUIT COURT FOR DAVI	dson county, tennéssee
	AT NASHVILLE	AM AM
		( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )
AARON L. SOLOMON,	)	(XM)
Plaintiff/Husband,	)	
,	)	/ Lu /
vs.	)	DOCKET No. 13D-1446
	ý	
ANGELIA SOLOMON,	, )	
Defendant/Wife.	)	
	C.P.P.P.P.	
	O <u>RDER</u>	

This cause came to be heard on the 9th day of May, 2014 before the Honorable Philip E. Smith, Judge of the Fourth Circuit Court for Davidson County, Tennessee upon Husband's Motion to Modify the Court's prior Order that he pay the cost of mediation, and the Wife's Motion to Expand Mother's Parenting Time. After hearing argument of counsel, the Court denied Husband's Motion for Wife to contribute to the payment of the mediator fees, but without prejudice to the Court considering the allocation of mediation fees at the Final Hearing, and the Court continued the Motion to Expand Mother's Parenting Time, although the Court indicated that parenting time would be expanded upon the re-filing of Mother's Motion, together with Affidavits from her treating psychologist and psychiatrist, and Father's right, if necessary, to depose those mental health caregivers. It is, therefore,

ORDERED, ADJUDGED AND DECREED that Husband's Motion to Modify the Court's prior Order that he pay the cost of mediation is denied, and Wife shall not be required to contribute to the payment of the mediator fees, but this ruling is without prejudice to the Court considering the allocation of mediation fees at the Final Hearing; and it is further,

ORDERED, ADJUDGED AND DECREED that Wife's Motion to Expand Mother's Parenting Time will be continued, although parenting time will be expanded upon the re-filing of Mother's Motion, together with Affidavits from her treating psychologist and psychiatrist, and Father's right, if necessary, to promptly depose those mental health caregivers.



DATED this the 19th day of \_ JUDGE PHILLE E. SMITH APPROVED FOR ENTRY: HELEN SFIKAS ROGERS No. 7025 Rogers, Kamm & Shea Attorneys for Wife The Wind in the Willows Mansion 2205 State Street Nashville, Tennessee 37203 (615) 320-0600 (615) 320-9933 (Fax) CERTIFICATE OF SERVICE The undersigned hereby certifies that on the larged day of \_\_ 2014, a truc and exact copy of the foregoing Order has been forwarded to the persons listed below: D. Scott Parsley Michael K. Parsley Parsley, Parsley & Strickland 219 Second Avenue, North, Suite 300 Nashville, TN 37201 by the method identified as follows: Deposit in the U.S. Mail, Postage Prepaid Hand Delivery Fax Overnight Delivery Certified Mail, Return Receipt Requested Email



IN THE FOURTH CIRCUIT	COURT FOR DAVIDSON COUNTY, TENNESSEE
AARON L. SOLOMON,	)
Plaintiff,	)
V	) Docket No. 13D-1446
ANGELIA SOLOMON,	) }
Defendant.	ý

# MR. SOLOMON'S RESPONSE TO MS. SOLOMON'S NOTICE OF FILING OF THE AFFIDAVIT OF MARY DUFF, LMSW

Mr. Solomon, in response to the Notice of Filing of the affidavit of Mary Duff, LMSW by Ms. Solomon, responds as follows:

Mr. Solomon would state and show unto this Honorable Court that counsel for the parties agreed to allow Mary Duff to supervise Mother's parenting time, however, counsel for Father did not agree for Mary Duff to become a witness in this cause in the process. Father requests that this Honorable Court strike the filing from the record and that Mother not be allowed to make Ms. Duff a witness.

Respectfully submitted,

D. SCOTT PARSLEY, #13606

PARSLEY, PARSLEY, & STRICKLAND 219 Second Avenue North, Suite 300

Nashville, TN 37201

(615) 244-8118

### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on Helen S. Rogers, The Wind in the Willows Mansion, 2205 State Street, Nashville, TN 37203, by placing same in the U.S. Mail, postage prepaid, on the \_\_\_\_\_\_\_day of May 2014.

D. SCOTT PARSLEY



IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE AT NASHVILLE 2014 MAY - 5 PM O TO

AARON L. SOLOMON,  Plaintiff/Husband,	RICHAND R ROOKER, CLERK
vs.	DOCKET No. 13D-1446
ANGELIA SOLOMON,	ĺ
Defendant/Wife.	)

#### **NOTICE OF FILING**

COMES NOW the Defendant/Wife, Angelia Solomon, by and through her counsel of record, and provides notice of filing the Affidavit of Mary Duff, LMSW, attached hereto as "Exhibit A".

Respectfully Submitted,

HELEN SFIKAS ROGERS, #7025

Attorney for Defendant/Wife

Rogers, Kamm & Shea

The Wind in the Willows Mansion

2205 State Street

Nashville, Tennessee 37203

(615) 320-0600 (Telephone)

(615) 320-9933 (Fax)

# CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the day of May 2014, a true and exact copy of the foregoing Notice of Filing has been forwarded to the persons listed below:

D. Scott Parsley Parsley, Parsley & Strickland 219 Second Avenue, North, Suite 300 Nashville, TN 37201

Judge Philip E. Smith, Chamber Copy Twentieth Judicial District 607 Metropolitan Courthouse Nashville, TN 37201

by the method identified as follows:

<u> </u>	Deposit in the U.S. Mail, Postage Prepaid Hand Delivery to Judge Sunth
	Fax
	Overnight Delivery
	Certified Mail, Return Receipt Requested
	Email Han Allean
	HELEN SFIKAS ROGERS

# IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE AT NASHVILLE

AARON L. SOLOMON,  Plaintiff/Husband,	)
vs.	) DOCKET No. 13D-1446
ANGELIA SOLOMON,  Defendant/Wife.	) )

## AFFIDAVIT OF MARY DUFF, LMSW

#### STATE OF TENNESSEE COUNTY OF DAVIDSON

I, Mary Duff, after being first duly sworn, say and depose as follows:

- 1. I am a licensed master social worker in the State of Tennessee. I work full time at Centennial Medical Center at Parthenon Pavilion. I also provide individual, private services supervising visitation.
- 2. I have been supervising the visitation of Mrs. Solomon and the parties' two (2) minor children, Grant, who is almost 12 years of age, and Gracie, who is 7½ years of age, every Saturday morning since March 1, 2014.
- 3. The children are excited to see their Mother. They are open and eager to share stories with her of how they are feeling and what they have been doing.
- 4. I have not observed any specific or problems that would raise concern with Mrs. Solomon's ability to care for the children. She is loving and caring toward the children. The children are open and receptive to her and return her love.
- 5. I have observed Mrs. Solomon feeding the children, playing basketball with Grant, painting Gracie's nails and all playing together outside with the dog. The children enjoy the activities Mrs. Solomon has arranged for them. Just as the children

have settled in for the visit, it is time to get ready to leave. The children appear to feel rushed to leave so soon and are often unable to finish their activities or are rushed through the activity due to the time restraint of two hours.

- 6. From the limited time I have spent with the children and Mrs. Solomon, Mrs. Solomon has been appropriate during the supervised visitations. She has not initiated conversations about the legal proceedings with the children during visits. If questioned by the children about legal proceedings or the situation involving both parents Ms. Solomon uses age appropriate language and/or appropriate redirection and reassurance.
- 7. From my observations during supervised visitations, Ms. Solomon does not appear to be intoxicated or on drugs. Mrs. Solomon has been flexible arranging the visits to work around the children's activities and my schedule. She is mindful of the time during the visits and is prompt in paying for my services.
- 8. It is my opinion that Mrs. Solomon's parenting time with the children could easily be extended to at least four (4) hours every Saturday with me being present during part of the time and then further expanded at reasonable intervals working toward unsupervised time. It is my recommendation that my supervised visit be a two (2) hour random visit during the four (4) hour visitation. It is my recommendation that I have a minimum of ten (10) minutes with the children alone during my supervision to discuss any concerns that may have occurred during the visit that was unsupervised. In my experience with past similar supervised visitations I have found that this arrangement provides the least traumatic transition for the children given the circumstances. It is also

proven in my past experience that this formula also assists in the eventual transition to unsupervised visits.

9. It is also my opinion that there should not be a problem for Ms. Solomon to attend all the children's school and extracurricular activities, perhaps with a friend accompanying her during those times provided that she not interrupt the activities.

Further, Affiant saith not.

MARY DUFF, LMSW

Sworn to and Subscribed before me

this day of May, 2014.

NOTARY PUBLIC

My Commission Expires:

Helen Sfikas Rogers\*† Lawrence J. Kamm Siew-Ling Shea† Katie Mathews Zipper George D. Spanos





PARALEGAL STAFF:
Alan Gentry
Nancy Hardt
Kathleen Marcotte
Renee Brown

\*Certified Civil Trial & Pretrial Practice Specialist †Rule 31 Mediator

May 6, 2014

#### VIA HAND DELIVERY

Honorable Judge Philip E. Smith 20<sup>th</sup> Judicial District, Fourth Circuit Court 607 Metro Courthouse Nashville, TN 37201

> Re: Aaron L. Solomon v. Angelia Solomon, Docket No. 13D-1446 Fourth Circuit Court for Davidson County, Tennessee

Dear Judge Smith:

Enclosed for your review is a chamber copy of the Notice of Filing the Affidavit of Mary Duff, LMSW in the above-referenced matter.

With best wishes, I remain

Very truly yours,

Helen S. Rogers

HSR/ngh Enclosure

cc:

Scott D. Parsley, Esq. Mrs. Angie Solomon



IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE AT NASHVILLE

AARON L. SOLOMON,

Plaintiff/Husband,

vs.

ANGELIA SOLOMON,

Defendant/Wife.

# MOTION TO EXPAND MOTHER'S PARENTING TIME

COMES NOW the Defendant/Wife, Angelia Solomon, by and through her attorney of record, and respectfully asks the Court for an order expanding her parenting time with the minor children and for cause would show to the Court as follows:

- 1. An Order was entered with the Court on January 8, 2014 allowing Mother only supervised parenting time each Saturday from 10:00 a.m. to 12:00 p.m. at Mother's expense. Since the entry of the Order, Mother has visited with the minor children each Saturday since January 18, 2014 and both parents are now employed. The parties are parents of two (2) minor children, Grant, age 11 ½ and Gracie, age 7 ½.
- 2. Mother's visits with the children were first supervised by a third-party supervisor at Heath Connect. Beginning March 1, 2014, the parties agreed to use Mary Duff, LMSW, to privately supervise the visits at the Mother's home or at the children's activities. Ms. Duff works full time at Centennial Psychiatric Hospital and has been working part-time supervising visitation in cases for approximately five (5) years. Ms. Duff charges \$75 per hour for supervision.
- 3. Mother and Father have worked together to schedule the visits around the children's sport activities. When the parties' daughter, Gracie, had soccer pictures scheduled during Mother's parenting time on March 29, 2014, by agreement Mother and the parties' son, accompanied by Ms.

Duff, drove Gracie to the gymnasium where the soccer pictures were to be taken. Mother and the children enjoyed the opportunity to be together away from the house.

- 4. There have been no problems during Mother's parenting time. Mother's short two (2) hour visits are not long enough for her and children to do more than share a quick meal or snack and start a short activity before it is time to prepare to leave. Mother tries to play a game of basketball with Grant and then take a few minutes to quickly paint Gracie's fingernails, but there is no time for anything else. Mother would state the children are excited to see her and disappointed when it is time to leave.
- 5. Mother would state that both children ask when they will be able to say longer. Gracie asks repeatedly how much time is left and says that she does not understand why they cannot stay. Every week before Mother and the children eat, Mother asks Grant to give the blessing. Recently, Grant prayed for the time with his Mother to go slower because it always goes too fast.
- 6. Mother believes it is in children's best interest to increase the visits to at least four (4) hours if they continue supervised or, alternatively, allow Mother every Saturday unsupervised from 8:00 a.m. to 6:00 p.m. with the children.
- 7. In addition to her increasing her regular Saturday visits, Mother would request that she be allowed to attend the children's extracurricular and school activities. At an activity, Mother would like to briefly say hello to the children, move away and observe the activity, then give the children a hug and say a quick goodbye. Mother proposes that she bring a friend to the activity, who has been previously been approved to accompany her, to the activity and who will stay with her at all times.
- 8. Mother further asks that any parenting Order of the Court include the standard parental rights which would allow her to communicate with the children's school.

Mother, thus, respectfully asks the Court for an order increasing her parenting time with the children to up to ten (10) hours every Saturday, allowing her to attend the children's school and

extracurricular activities and that the standard parental rights be included as part of any parenting Order of the Court.

Respectfully submitted,

HELEN SFIKAS ROGERS, No. 7025

ROGERS, KAMM & SHEA

Attorneys for Defendant/Wife

2205 State Street

Nashville, Tennessee 37203

(615) 320-0200 (Phone)

(615) 320-9933 (Fax)

THIS MOTION IS EXPECTED TO BE HEARD MAY 9, 2014 AT 9:00 A.M.

#### CERTIFICATE OF SERVICE

D. Scott Parsley Parsley, Parsley & Strickland 219 Second Avenue, North, Suite 300 Nashville, TN 37201

by the method identified as follows:

Deposit in the U.S. Mail, Postage Prepaid
Hand Delivery
Fax
Overnight Delivery
Certified Mail, Return Receipt Requested
Email

HELEN SFIKAS ROGERS



IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
AARON L. SOŁOMON,  Plaintiff,  v.  Docket No. 13D-1446  ANGELIA SOLOMON,  Defendant.
AGREED ORDER
The Parties, Aaron Solomon and Angelia Solomon pursuant to the Tennessee Rules of Civil
Procedure, hereby consent to the entry of this Protective Order, as evidenced by the signature of
Counsel below.
IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Ms. Solomon and her
Attorney of Record shall not release to Ms. Solomon or any other person or entity all documents and
financial records relative to Mr. Solomon's trust(s) and the trust(s) themselves. Such data shall be
referred to as "Confident Information," and documents containing such information shall be
designated by stamping such material with the legend "Confidential" in a manner capable of being
reproduced by photocopying.
IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the financial, tax
records, and trusts are being provided pursuant to this Order and may not be released to anyone other
than counsel, any experts or this Court unless agreed otherwise or Ordered by the Court.
ENTERED this day of, 2014.
JUDGE

APPROVED FOR ENTRY

D. SCOTT PARSLEY, #13606

Counsel for Mr. Solomon

PARSLEY, PARSLEY & STRICKLAND

219 Second Avenue North, Suite 300

Nashville, TN 37201

(615) 244-8118

(615) 244-8842 Facsimile

HELEN S. ROGERS, #7025

Counsel for Ms. Solomon

The Wind In The Willows Mansion

2205 State Street

Nashville, TN 37203

(615) 320-0600

(615) 320-9933 Facsimile

#### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on Helen S. Rogers, The Wind in the Willows Mansion, 2205 State Street, Nashville, TN 37203, by placing same in the U.S. Mail, postage prepaid, on the 2 day of April 2014.

D. SCOPT PARSLEY



IN THE FOURTH CIRCUIT COUR	RT FOR DAVIDSON COUNTY, TENNESSEE
AARON L. SOLOMON,	)
Plaintiff,	
v.	) Docket No. 13D-1446
ANGELIA SOLOMON,	
Defendant.	)
5	ORDER
This cause came to be heard on the	e 11th day of April, 2014, before the Honorable Philip
E. Smith, Judge of the Fourth Circuit C	ourt for Davidson County, Tennessee upon Father's
Motion to Set Temporary Child Support,	for Mediation and to Set for Trial. It appearing to the
Court that the parties have agreed on med	iation with the Honorable Greg Smith of the Nashville
Bar, therefore, there is no necessity for a	on Order from the Court for mediation. Further, as a
result of the mediation being set, counsel	for Father struck the Motion to Set. The Court finds
this date it will grant to Ms. Solomon a	ninety day reprieve as relates to child support since
counsel for Ms. Solomon has informed to	his Court that Ms. Solomon has not received her first
paycheck as of this date. The Court finds	that counsel for Ms. Solomon gave to counsel for Mr
Solomon this date a letter from Wal-Mar	t as relates to the contract of employment showing her
base salary to be \$124,800.00 per year.	Further, counsel for Mr. Solomon announced to the
Court that Mr. Solomon has secured a join	b for \$49,500.00 per year with a start date of April 21
2014.	
Enter this day of	2014.
2	

APPROVED FOR ENTRY:

D. SCOTT PARSLEY, #13606

PARSLEY, PARSLEY & STRICKLAND

219 Second Avenue North, Suite 300

Nashville, TN 37201

(615) 244-8118

(615) 244-8842 Facsimile

#### CERTIFICATE OF SERVICE

D. SCOFFPARSLEY



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		2016	$\mathcal{A}_{\mathcal{A}}$
IN THE FOURTH C	IRCUIT COURT FOR DAVIDS	SON COUNTY, TENNE	sseg A
IK THE FOOK III C	AT NASHVILLE		AM.
AARON L. SOLOMON,  Plaintiff/Husband,  vs.	) ) ) ) D	OCKET No. 13D-1446	39
ANGELIA SOLOMON,	)		
Defendant/Wife.	)		
	ORDER	•	

This cause came to be heard on April 11, 2014 before the Honorable Philip E. Smith, Judge of the Fourth Circuit Court for Davidson County, Tennessee upon Husband's Motion to Set, Husband's Motion for Mediation, and Husband's Motion to Set Temporary Child Support. After hearing argument of counsel, testimony of the parties and consideration of the entire record, the Court finds and it is therefore,

ORDERED, ADJUDGED AND DECREED that Husband's Motion for Mediation is moot. It was announced that the parties shall attend mediation with Greg Smith on June 30, 2014 beginning at 9:00 a.m. and it is further

ORDERED, ADJUDGED AND DECREED that Husband's Motion to Set was sticken from the docket; and it is further

ORDERED, ADJUDGED AND DECREED that Husband's Motion to Set Temporary Child

Support shall be deferred for ninety (90) days at which time the Court shall set support.

DATED this the 23 day of April \_\_\_\_\_\_, 201

JUDGE PHILIP E. SMITH

ORDERED, ADJUDGED AWD DECREED that the letter given to secursel For ME. Soloman shared Mr. Soloman had a job making 124,800 per year, (Pt.S) Copy

#### APPROVED FOR ENTRY:

HELEN SFIKAS ROGERS, No. 7025

Rogers, Kamm & Shea

Attorneys for Wife

The Wind in the Willows Mansion

2205 State Street

Nashville, Tennessee 37203

(615) 320-0600

(615) 320-9933 (Fax)

### CERTIFICATE OF SERVICE

D. Scott Parsley Michael K. Parsley Parsley, Parsley & Strickland 219 Second Avenue, North, Suite 300 Nashville, TN 37201

by the method identified as follows:

Deposit in the U.S. Mail, Postage Prepaid

Hand Delivery
Fax

Overnight Delivery

Certified Mail, Return Receipt Requested

**Email** 

HELEN SFIKAS ROGE



Сору

IN THE FOURTH CIRC	UIT COURT FOR DAVIDSON COU	NTY, TENNESSPA APP
	AT NASHVILLE	MONEY 23 AMII: 2
AARON L. SOLOMON,  Plaintiff/Husband,  vs.	) ) ) ) DOCKET N	10. 13D-1446
ANGELIA SOLOMON,  Defendant/Wife.	)	

#### AGREED ORDER

It appearing to the Court, as evidenced by the signatures below, that after meeting with the Special Master, the parties announced to the Court an agreement for Mother to speak with the children every morning; and the Court being pleased to accept this agreement, it is therefore

ORDERED, ADJUDGED and DECREED that Father shall call Mother daily at 7:00 a.m. for Mother to speak with the children during their ride to school which usually ends at 7:45 a.m. or at 7:30 a.m. if school is not in session.

DATED this the 23 day of

2014.

JUDGE PHILIP E. SMITH

APPROVED FOR ENTRY:

HELEN SFIKAS ROGE

Rogers, Kamm & Shea Attorneys for Wife

The Wind in the Willows Mansion

No. 7025

2205 State Street

Nashville, Tennessee 37203

(615) 320-0600

(615) 320-9933 (Fax)

Сору

D. SCOTT PARSLEY, NO. 18606 MICHAEL K. PARSLEY, NO. 23817

Parsley, Parsley & Strickland Attorneys for Husband 219 Second Avenue North, Suite 300 Nashville, Tennessee 37201 (615) 244-8118

(615) 244-8842 (Fax)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the day of 2014, a true and exact copy of the foregoing Agreed Order has been forwarded to the persons listed below:

D. Scott Parsley
Michael K. Parsley
Parsley, Parsley & Strickland
219 Second Avenue, North, Suite 300
Nashville, TN 37201

by the method identified as follows:

Deposit in the U.S. Mail, Postage Prepaid
Hand Delivery
Fax
Overnight Delivery
Certified Mail, Return Receipt Requested
Email

HELEN SFIKAS ROGE





IN THE FOURTH CIRCU	JIT COURT FOR DAVIDSON COUNTY	, TENNESSEN APR 20
	AT NASHVILLE	Morris Co Au
		A. Form 4171: 3
AARON L. SOLOMON,	)	1.1
	ì	
Plaintiff/Husband,	,	54
	)	
	DOCKET No. 13	3D-1446
vs.		7.
	)	
ANGELIA SOLOMON,	)	1.0
	ì	
Defendant/Wife.	,	
	<u>ORDER</u>	

This cause came to be heard on March 28, 2014 before the Honorable Philip E. Smith, Judge of the Fourth Circuit Court for Davidson County, Tennessee upon Husband's Motion to Set and Husband's Motion pertaining to Mother's nightly phone calls with the children. After hearing argument of counsel, testimony of the parties and consideration of the entire record, the Court finds and it is therefore,

ORDERED, ADJUDGED AND DECREED that Husband's Motion is granted in part to the extent that the previous Order entered with the Court on November 27, 2013 shall be modified to allow Mother to have unimpeded daily phone calls with the minor children; and it is further

ORDERED, ADJUDGED AND DECREED that the Motion to Set is continued to April 11,

2014 at 9:00 a.m.

DATED this the 23 day of April . 2014.

Сору

APPROVED FOR ENTRY:

HELEN SFIKAS ROCERS, No.

Rogers, Kamm & Shea
Attorneys for Wife
The Wind in the Willows Mansion
2205 State Street
Nashville, Tennessee 37203
(615) 320-0600
(615) 320-9933 (Fax)

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of 2014, a true and exact copy of the foregoing Order has been forwarded to the persons listed below:

D. Scott Parsley Michael K. Parsley Parsley, Parsley & Strickland 219 Second Avenue, North, Suite 300 Nashville, TN 37201

by the method identified as follows:

Deposit in the U.S. Mail, Postage Prepaid
Hand Delivery
Fax
Overnight Delivery
Certified Mail, Return Receipt Requested
Email

HELEN SFIKAS ROGE





IN THE FOURTH CIRCU	IT COURT FOR DAVIDSON COUNT	Y, TÉNNÉSSEE
AARON L. SOLOMON,	)	RICHARD R. REST. O
Plaintiff,	)	RICHARD R. ROOK S. SO
ν.	) Docket No. 13D-144	16 00
ANGELIA SOLOMON,	)	The
Desendant.	ý	

### **MOTION**

Mr. Solomon moves this Honorable Court to modify the Court's Order of March 31, 2014. As cause, he would state and show unto this Honorable Court that the parties originally agreed that Mr. Solomon would initially bear the entire cost of the parties' mediation with the decision to be made at the final hearing of this matter as relates to her contribution. Mr. Solomon would state unto this Honorable Court that Ms. Solomon is now employed earning over \$120,000.00 per year and is capable of paying her portion of the mediation cost.

Respectfully submitted,

D. SCOTT PARSLEY, #13606
PARSLEY, PARSLEY & STRICKLAND
219 Second Avenue, North, Suite 300
Nashville, TN 37201
(615) 244-8118
(615) 244-8842 Facsimile

### CERTIFICATE OF SERVICE

D. SCOTT PARSLEY

THIS MOTION IS EXPECTED TO BE HEARD MAY 9, 2014, AT 9:00 A.M.



STATE OF T	ENNESSEE	SU	BPOENA	CIVIL ACTION
DAVIDSON	COUNTY	TESTIMONY/PRODUCTION REQUIRED (SEE NOTICE BELOW)		DOCKET NO
Circuit Court		MEDICAL RECORDS (SE	E RIPAA REQUIREMENT BELOW)	DOCKLI NO
PLAINTIFF Aaron L. Solo	mon	2014 APR 15	PM 5: <b>DEFENDANT</b> Angelia Solomon	
		E NUMBER OF WITNESS)	7. Sept. 1982 1982 1982 1982 1982 1982 1982 1982	Method of Service:
Wal-Mart; ATTI	N: Andrea Rachel	le Raines		☐ Davidson County Sheriff
	(931) 729-1358 @wal-mart.com	190		x Personal Service
				Out of County Sheriff
	anded to	annoar at the time di	ate and place specified for the p	ourpose of giving testimony. In
l addition if ind	licated wou are t	a bring the stems liste	d. Failure to appear may result ent as provided by law.	in contempt of Court which
	DATE	ino ditaret impre	ITEMS TO BRING:	Mary San Angelia Salamont
3:00 PM	May 5, 2014		2) Cost and availability of health	and/or wages for Angelia Solomon; and life insurance;
PLACE	Circuit Court Cle		3) Verification of first day of work	and a copy of first paycheck.
	1 Public Square, Nashville, TN 37 (OR)	Room 302 7201		
Law Office of D	, Scott Parsley			
219 Second Av	enue North, Suite	300		
Nashville, TN 3	57201			
	This subpoena is being issued on behalf of Additional List Attached			
PLAINTIFF	DEFENI	5/1/2 1000 201		
D. Scott Parsi	ME, ADDRESS & TELEP By		Circuit Court Clork	
219 Second Avenue North, Suite 300 Nashville, TN 37201 (615) 344-8118				
Nashville, TN 37201 (013) 214-0116  BY:				
ATTORNEY'S SIGNA	ATTORNEY'S SIGNATURE: DEPUTY CLERK			PUTY CLERK
DESIGNEE:			To request an ADA accommodation, please contact Dart Gore at 880-3309.	
DESIGNEE'S SIGNA	And and a second			
Testimon	y/Production requi	red. TESTIMON	Y/PRODUCTION NOTICE	
this Outpresses within twenty-one (21) days after the day of service of the Subpoena waives all				
objections to t	e to serve all object he Subpoena, excep ation, or tangible thin	ot the right to seek the rea	sonable costs for producing books, pa	apers, documents, electronically
Medical F	Records Requested	– HIPAA notice require		
			HIPAA NOTICE	r 1 41 11
of		, 20, so as to allow	for the patient or the patient by mail on the patient by mail on the patient by mail on the patient by mail of the patient by mail of the patient by mail or the	
l fact	simile to the party th	at served the Suppoena, i	with a written objection to the Subpos and	
Loc	(B) Simultaneously file and serve a Motion for a Protective Order consistent with the requirements of T.R.C.P. 26.03, 26.07 and Local Rule §22.10.			
documents by	ection is made withing the date and time to was provided to the	specified in the Suppoena	the above date, you shall process this . The signature of counsel or party or	Subpoena and produce the name that the subpoena is certification that the

IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

AARON L. SOLOMON,	)
Plaintiff,	)
ν.	) Docket No. 13D-1446
ANGELIA SOLOMON,	)
Defendant.	)

### NOTICE OF DEPOSITION

Please take notice that Aaron L. Solomon, by and through counsel, will take the deposition of the Keeper of the Records for Wal-Mart, on May 5, 2014, at 3:00 p.m., at the law offices of D. Scott Parsley, 219 Second Avenue North, Suite 300, Nashville, Tennessee 37201, or as soon as possible thereafter in accordance with schedules of the parties and their counsel, said deposition is **for records only** and is being taken pursuant to the *Tennessee Rules of Civil Procedure* and continuing from day to day until completed.

Respectfully submitted:

D. SCOTT PARSLEY, #13606

PARSLEY, PARSLEY & STRICKLAND 219 Second Avenue North, Suite 300 Nashville, Tennessee 37201

(615) 244-8118

(615) 244-8842 (fax)

### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on Helen S. Rogers, The Wind in the Willows Mansion, 2205 State Street, Nashville, TN 37203, by placing same in the U.S. Mail, postage prepaid, on the \_\_\_\_\_\_ day of April, 2014.

D. SCOTT PARSLEY

IN TI	HE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
AARON L. SO	DLOMON,
Plainti	ff,
v.	) Docket No. 13D-1446
ANGELIA SO	DLOMON,
Defen	dant.
	AFFIDAVIT OF CUSTODIAN OF RECORDS
STATE OF T	TENNESSEE ) F DAVIDSON )
(a)	That I am the duly authorized Custodian of Records of Wal-Mart and have authority
to certify said	records;
(b)	That the copy of the records on Angelia Solomon, attached to this Affidavit, are a
	true and complete copy;
(c)	That the records were prepared by the personnel of this office in the ordinary course
	of business at or near the time of the act, condition, or event;
(f)	As indicated in the Subpoena Duces Tecum, counsel for Angelia Solomon, shall
	receive a copy of the attached records of Angelia Solomon.
	(Signature of Affiant)
	Sworn to and subscribed by me on this day of, 2014.
	NOTARY PUBLIC

My Commission Expires:



## IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE AT NASHVILLE 2014 APR 10 PM 3: 24 AARON L. SOLOMON, Plaintiff/Husband, Vs. DOCKET No. 13D-1446 ANGELIA SOLOMON, Defendant/Wife.

### **NOTICE OF FILING**

COMES NOW the Defendant/Wife, Angelia Solomon, by and through her counsel of record, and provides notice of filing of Mother's parenting class Certificate of Participation, attached hereto as "Exhibit A", concerning Mother's successful completion of the four-hour parenting seminar conducted by Parenting Skills Institute on March 27, 2014.

Respectfully Submitted,

HELEN SFIKAS ROGERS, #7025

Attorney for Defendant/Wife

Rogers, Kamm & Shea

The Wind in the Willows Mansion

2205 State Street

Nashville, Tennessee 37203

(615) 320-0600 (Telephone)

(615) 320-9933 (Fax)

### **CERTIFICATE OF SERVICE**

	by certifies that on the lot day of 2014, a true and Notice has been forwarded to the persons listed below:
D. Scott Parsley Michael K. Parsley Parsley, Parsley & St 219 Second Avenue, Nashville, TN 37201	North, Suite 300
by the method identified as f	Deposit in the U.S. Mail, Postage Prepaid Hand Delivery Fax Overnight Delivery Certified Mail, Return Receipt Requested Email

## Parenting Skills Institute

# A court-approved seminar for parents

ANGELIA Socomon

Has successfully completed the Parenting Skills Institute seminar for parents

Topics Covered:

Helping Children Adjust

How to Handle Visitation

**Economic Changes** 

Age-specific Needs of Children

Relationship Changes

The Parenting Plan

Lhild Support

Anger between Parents

Legal Aspects of the Divorce

The Stages of Grief

Divorce and Its Effects on the family

The Role of Step Parents

Effects of Domestic Violence on Family

Co-Parenting

Responsible Dating

3/27/2014

Communicating with Children

How to Tell Children about the Divorce

The Mediation Process

Docket Number

(3D-)446

Virginia D. Taylor, Ph.D., Director



### IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

AARON L. SOLOMON,	)	2014 MAR 28 AM 10: 06
Plaintiff,	, )	RICHARD R. ROOKER, CLERY
v.	)	Docket No. 13D-1446
ANGELIA SOLOMON,	)	×
Defendant.	)	

### MOTION TO SET TEMPORARY CHILD SUPPORT

Mr. Solomon moves this Honorable Court to set temporary child support in this matter. As cause, he would state and show unto this Honorable Court that Mother is now apparently employed at Wal-Mart Pharmacy and is capable of paying support.

Respectfully submitted

D. SCOTT PARSLEY, #13606
PARSLEY, PARSLEY & STRICKLAND
219 Second Avenue, North, Suite 300
Nashville, TN 37201
(615) 244-8118
(615) 244-8842 Facsimile

### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on Helen S. Rogers, The Wind in the Willows Mansion, 2205 State Street, Nashville, TN 37203, by placing same in the U.S. Mail, postage prepaid, on the \_\_\_\_\_\_\_ day of March, 2014.

D. SCOTT PARSLEY

THIS MOTION IS EXPECTED TO BE HEARD APRIL 11, 2014, AT 9:00 A.M.



IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

) 2014 HAR 18 PH 3: 18
KICHAYO PROOR R. CLOM
Docket No. 13D-1446
)
<b>'</b>

### **ORDER**

This cause came to be heard on the 14<sup>th</sup> day of March, 2014, before the Honorable Philip E. Smith, Judge of the Fourth Circuit Court for Davidson County, Tennessee upon Mr. Solomon's Motion to set this matter for mediation. It appearing to the Court from the signature of counsel below that they have reached an agreement concerning the same.

- It is, ORDERED, ADJUDGED AND DECREED that the parties shall utilize the services of the Honorable Greg Smith of the Nashville Bar to mediate this matter.
- 2. The parties are in agreement that they will set this matter for mediation with Mr. Smith by agreement.
- 3. It is, **ORDERED**, **ADJUDGED AND DECREED** that initially Mr. Solomon shall bear the entire cost of the mediation, however, the issue of Ms. Solomon's contribution to the cost of mediation shall be reserved for decision by the Court at the final hearing of this matter.

Enter this	day of	, 2014.		

PHILIP E. SMITH, JUDGE

APPROVED FOR ENTRY:

D. SCOTT PARSLEY, #13606

PARSLEY, PARSLEY & STRICKLAND

219 Second Avenue North, Suite 300

Nashville, TN 37201

(615) 244-8118

(615) 244-8842 Facsimile

HĚLEN S. ROGERS, 47025

The Wind In The Willows Mansion

2205 State Street

Nashville, TN 37203

(615) 320-0600

(615) 320-9933 Facsimile

### **CERTIFICATE OF SERVICE**

D. SCOTT PARSLEY

IN THE FOURTH CIRCU	IT COURT FOR DAVIDSON COUNTY, TENNESSEE
AARON L. SOLOMON,	)
Plaintiff,	)
γ.	) Docket No. 13D-1446
ANGELIA SOLOMON,	)
Defendant.	}
	ORDER

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Enter	this	day of	, 2014

PHILIP E. SMITH, JUDGE

### APPROVED FOR ENTRY:

D. SCOTT PARSLEY, #13606

PARSLEY, PARSLEY & STRICKLAND 219 Second Avenue North, Suite 300 Nashville, TN 37201

(615) 244-8118

(615) 244-8842 Facsimile

HELEN S. ROGERS, #7025

The Wind In The Willows Monsion

2205 State Street

Nashville, TN 37203

(615) 320-0600

(615) 320-9933 Facsimile

### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on Helen S. Rogers, The Wind in the Willows Mansion, 2205 State Street, Nashville, TN 37203, by placing same in the U.S. Mail, postage prepaid, on the \_\_\_\_\_ day of March, 2014.

D. SCOTT PARSLEY

HELEN SFIKAS ROGERS\*† LAWRENCE J. KAMM SIEW-LING SHEA† KATIE MATHEWS ZIPPER GEORGE SPANOS



PARALEGAL STAFF:
ALAN GENTRY
NANCY HARDT
KATHLEEN MARCOTTE
RENEE BROWN
LAURA SMITH

\*BOARD CERTIFIED CIVIL TRIAL & PRETRIAL PRACTICE SPECIALIST †RULE 31 MEDIATOR

### **FAX TRANSMITTAL COVER SHEET**

TO:

D. Scott Parsley

FAX NO:

615-244-8842

FROM:

Helen S. Rogers

DATE:

March 14, 2014

RE:

Solomon

**PAGES:** 

3, including this page.

**COMMENTS:** 

Mr. Parsley - You have permission to sign Helen Rogers' name to the

Order attached.

If you have any problem receiving this transmission, please call **Trudie Condra** (615) 320-0600 immediately.

NOTE: This facsimile contains privileged and confidential information intended only for the use of the specific individual or entity named above. If you are not the intended recipient of this facsimile, or if you have received this in error, please immediately notify the person named above by telephone and return the original facsimile to us at the address below via U.S. Postal Service. Thank you.

HELEN SFIKAS ROGERS\*† LAWRENCE J. KAMM SIEW-LING SHEA† KATTE MATHEWS ZIPPER GEORGE SPANOS

\*BOARD CHRITESHD CIVIL TRIAL & PRETRIAL PRACTICE SPECIALIST †RULE 31 MEDIATOR

### ROGERS, KAMM & SHIEA

03/14 14:12

00'32

3

OK

PARALEGAL, STAFF:
ALAN GENTRY
NANCY HARDT
KATHLEEN MARCOTTE
RENEE BROWN
LAURA SMITH

### **FAX TRANSMITTAL COVER SHEET**

TO:

D. Scott Parsley

DESTINATION ID

ST. TIME

PGS.

RESULT

TX/RX TIME

FAX NO:

615-244-8842

FROM:

Helen S. Rogers

DATE:

March 14, 2014

RE:

Solomon

PAGES:

3, including this page.

**COMMENTS:** 

Mr. Parsley - You have permission to sign Helen Rogers' name to the

Order attached.

If you have any problem receiving this transmission, please call **Trudic Condra** (615) 320-0600 immediately.

### D. SCOTT PARSLEY & ASSOCIATES LAW OFFICES

D. SCOTT PARSLEY

MICHAEL K. PARSLEY

JOSHUA G. STRICKLAND

MELISSA MORGAN, Paralegal

SARAH HAZLEWOOD, Paralegal

219 SECOND AVENUE, NORTH

SUITE 300

NASHVILLE, TN 37201

TELEPHONE: 615-244-8118

FACSIMILE: 615-244-8842

### **FAX COVER SHEET**

PLEASE DELIVER THE FOLLOWING PAGE(S)

TO:

Helen Rogers

FAX NO:

(615) 320-9933

FROM:

D. Scott Parsley

DATE:

March 14, 2014

TOTAL PAGES INCLUDING COVER:

3

COMMENTS:

Please see the attached Order. Please advise if I may sign your name with permission. Thank you.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED OR CONFIDENTIAL.

If you are not the intended recipient of the following telecopy, please he advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this communication in error, please notify us immediately by telephone collect to the sender shown above. We also would appreciate your returning the original message to us at the above address via United States Mail. Thank you for your cooperation,

### THE DIRECT NUMBER FOR THIS MACHINE IS: (615) 244-8842

IF YOU DO NOT RECEIVE ALL, OR ANY PORTION, OF THIS TRANSMISSION, OR IF THERE ARE ANY QUESTIONS, PLEASE CONTACT THIS FIRM AT (615) 244-8118. THANK YOU.

### ORIGINAL TO FOLLOW VIA:

[X] First Class Mail

| | Federal Express | | Original will not be sent

| | Express Mail

[ ] Messenger

CLIENT:

Solomon

TRANSMITTER:

M. Morgan

IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

AT NASHVILLE

OUR 19 PM 3: 17

	201111111111
AARON L. SOLOMON,  Plaintiff/Husband,	(2)A
vs.	DOCKET No. 13D-1446
ANGELIA SOLOMON,	ý
Defendant/Wife.	)

### WIFE'S RESPONSE TO HUSBAND'S MOTION

COMES NOW, the Defendant/Wife/Mother, Angelia Solomon, by and through counsel, and in response to Plaintiff/Husband/Father's Motion pertaining to Mother's phone calls with the children requests that this Honorable Court deny said motion in its entirety and would respectfully state as follows:

- 1. On November 27, 2013 an Order was entered with the Court that states in pertinent part "...Mother shall be allowed to exercise telephone parenting time each night at 7:30 p.m. pending further Orders of this Honorable Court".
- 2. Since the entry of this Order, Mother has been very flexible when it comes to scheduling her telephone parenting time in an effort to accommodate the children's activities and schedules. However, it seemed to Mother that Father was not even trying to make the children available for the court ordered 7:30 p.m. telephone calls. Often Father schedules Mother's phone time with the children when they are tired or attending an activity that prevents Mother from having a quality conversation with the children. Father is unemployed, so Father's activities and schedule should not conflict with Mother's court ordered phone parenting time. Often Father calls Mother while the children are in the car with him so he can listen in to the calls.

3. Mother recently notified Father that she would like to begin to comply with the court ordered 7:30 p.m. phone time whenever possible. Mother requested that Father have the children available at that time so she could call the children instead of the children always calling her.

4. Since that time, Mother has had numerous requests from Father to schedule Mother's calls at a different time. Mother has accommodated all these requests by telling Father that she is happy to talk to the children anytime. Please see emails attached as *Collective Exhibit A*.

5. Mother would state that Father continues to try to place Mother in a less than favorable position before the Court and to thwart all attempts Mother has made to comply with this Court's Orders, when he is violating her parental rights by listening to the calls.

Thus, Mother asks that the Court deny Father's Motion and order him to make the children available for her 7:30 p.m. telephone parenting time unless the children are participating in a ballgame or other such extracurricular activity that would prevent their talking to Mother. Mother also asks for her reasonable attorney fees and costs for having to defend this Motion and that she be allowed to attend the children's activities and see them there which would eliminate the need for calls on those days and nights.

HELEN SFIKAS ROGERS, #7025

Rogers, Kamm & Shea

Attorneys for Defendant/Wife
The Wind in the Willows Mansion

2205 State Street

Nashville, Tennessee 37203

(615) 320-0200

(615) 320-9933 (fax)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the day of day of 2014, a true and exact copy of the foregoing Response to Motion has been forwarded to the persons listed below:

Bench copy hand-delivered to:
Honorable Judge Philip E. Smith
Fourth Circuit Court for Davidson County, Tennessee
607 Metropolitan Courthouse
Nashville, TN 37201

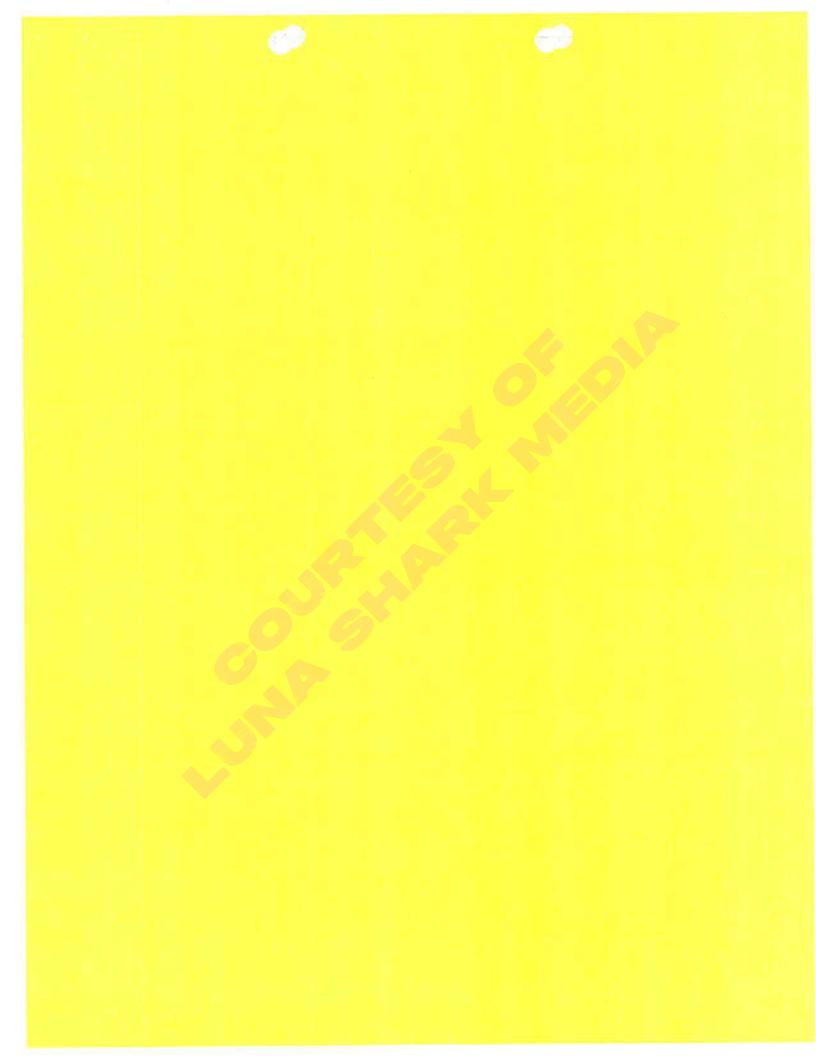
and:

D. Scott Parsley Michael K. Parsley Parsley, Parsley & Strickland 219 Second Avenue, North, Suite 300 Nashville, TN 37201

by the method identified as follows:

Deposit in the U.S. Mail, Postage Prepaid
Hand Delivery
Fax
Overnight Delivery
Certified Mail, Return Receipt Requested
 Email

HELEN SFIKAS ROGER



Sat, Feb 8, 7:30 PM

Kids will call later. Watching a movie.

7:30 PM

Sat, Feb 8, 9:00 PM

How istic?

9:00 PM

A few min

9:00 PM



On Mar 13, 2014, at 6:41 F..., Ang Solomon <angsolomon30@gma...com> wrote:

Sent from my iPhone

Begin forwarded message:

From: Ang Solomon <angiesolomon30@gmail.com>

Date: March 13, 2014 at 6:35:04 PM CDT

To: Aaron Solomon <aaronsolomon32@gmail.com>

Subject: Re: Call tonight

The children are welcome to call me any time. Thx. Angie

On Mar 13, 2014, at 6:14 PM, Aaron Solomon <aaronsolomon32@gmail.com> wrote:

Angie, once again it would be helpful in getting the kids in bed if Gracie could talk at 6:45 if you are available at that time.

Thank you

Aaron Solomon



From: Aaron Solomon <aaronsolomon32@gmail.com>

Date: March 12, 2014 at 5:16:20 PM CDT

To: angiesolomon30@gmail.com

Subject: Call tonight

With grant's basketball game being late last night, the kids got in bed a little later than normal which has made them a little more tired this evening. To get them in bed earlier it would help if they could call earlier than 7:30 it would help.

Thank you

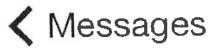
Aaron Solomon



●●●●○ AT&T LTE

10:34 AM





**Aaron** 

Contact

Saturday 7:45 PM



7:45 PM

Gracie is at Sydney's I thought she told you Grant at Jack's figured he would have told u too

7:48 PM

Ok. So what time will they be calling tonight?

7:52 PM

I don't know. They don't always call from others' houses.

7:54 PM

Ok. What are you doing to arrange iit for tonight?

7:59 PM

### It's going to get late. What is going on with the kids and my time to talk

8:19 PM



Text Message

Send

OOOO AT&T LTE

10:34 AM



Messages

Aaron

Contact

It's going to get late. What is going on with the kids and my time to talk tonight?

8:19 PM

Hello? Aaron - it's 9:03 pm now. What is going on with the children and my nightly call?

9:04 PM

Saturday 10:09 PM

Aaron - it's after 10 now these were orders of the court. Thk u.

10:09 PM