FM-218 ADDENDUM - MOTION FOR IMMEDIATE EXPEDITED HEARING

Plaintiff requests the earliest lawful three-hour hearing. Good cause exists because tax and annual-disclosure issues remain unresolved; ordered weekly therapy is not operating consistently; daily electronic and staged in-person contact remain disputed; school and records issues are current; the child is nearing the end of minority; and the delay itself destroys the subject of the relief.

The requested hearing should address the current Counts I-X, threshold preclusion/scope, present ability, cure, neutral investigation, and a concrete purge plan. Historical evidence should be limited to notice, feasibility, child impact, and remedy unless the Court expressly identifies an open historical claim.

Estimated hearing time: three hours. Requested witnesses: Plaintiff; Defendant; Daniel Pierce, LCSW; a school records/attendance witness if necessary; a tax-preparer/records custodian only if authenticity is disputed; and any GAL/neutral professional authorized by the Court. Glenn Anderson and Attorney Ramirez are requested only if the Court first resolves prior scope restrictions and finds their testimony relevant.

Plaintiff is not incarcerated. Plaintiff requests a remote option for provider/school witnesses, separate handling of nonpublic child medical or counseling records, and a written order identifying every issue granted, denied, deferred, precluded, or reserved.