

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF PRINCE WILLIAM

CHERI SMITH)	
Complainant)	
)	
v.)	Chancery No. 53360-00
)	
WESLEY C. SMITH)	
Defendant)	

MOTION FOR PENDENTE LITE RELIEF

COMES NOW the Complainant, Ms. Smith, by counsel, and moves this Court pursuant to Va. Code Ann § 20-103, for entry of an Order granting her *pendente lite* relief as requested below. In support of her MOTION the Complainant states as follows:

1. That a *Pendente Lite* Order was entered by this Court on October 2, 2003;
2. That the above-mentioned *Pendente Lite* Order granted sole legal and physical custody of the minor child, Liam R. Smith to the Complainant, Cheri Smith;
3. That the above-mentioned *Pendente Lite* Order granted the Defendant, Wesley C. Smith, visitation with the minor child;
4. That the above-mentioned *Pendente Lite* Order did not specify where the pick up for and return from visitation would take place;
5. That the Defendant has badgered the client at her residence on a number of occasions while picking up the minor child for visitation.
6. That the Defendant has refused to meet the Complainant in a public place to pick up the minor child.

WHEREFORE the Complainant requests the following relief *pendente lite*:

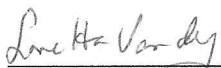
1. That the Court amend the *Pendente Lite* Order dated October 3, 2003;.

2. That the Court establish an exchange point in a public arena for the exchange of the minor child;
3. An order awarding the Complainant's attorneys' fees incurred herein;
4. An order for such further relief as the nature of the case and the goals of equity require.

Respectfully submitted,

CHERI SMITH

By Counsel



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