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E. Gregory Alford, Esq., CFLS, SBN 56431
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1551 Fourth Avenue, Suite 301
San Diego, CA 92101

(619) 232-4734

Attorney for Clifford L. Roepke

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO
FAMILY LAW CENTRAL

Marriage of:

Petitioner: MICHELE LALLY

Respondent: CLIFFORD L. ROEPKE

No. D472021

NOTICE OF LODGMENT

Date:

Time: 1:45 p.m.

Dept.: F-1

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT the following exhibits will be lodged with the court in Support of Respondent's pending Order to Show Cause and Affidavit for Contempt:

1. **Exhibit A:** three pages consisting of copies of facsimile dated 10/27/2003 addressed to Jacques [sic] Pouliot, facsimile dated 10/27/2003 addressed to Michele and letter dated October 30, 2003, from Jac F. Pouliot to Jeffrey C. Fritz.
2. **Exhibit B:** consisting of copies of facsimile dated 11/25/2003 addressed to Michele with calendar attachment (three pages), letter dated December 4, 2003, from Jac F. Pouliot to Jeffrey C. Fritz (one page) and transmission verification report of preceding letter (one page).
3. **Exhibit C:** four pages consisting of copies of facsimile dated 12/11/2003 addressed to Jacques [sic] Pouliot, facsimile dated 12/11/2003 addressed to Michele, letter dated December 11, 2003,

1 from Jac F. Pouliot to Jeffrey C. Fritz, and transmission verification report of preceding letter.

2 4. **Exhibit D:** consisting of one-page facsimile dated 12/29/2003, from Michele Lally to Mr. Pouliot
3 and letter dated January 6, 2004, from Jac F. Pouliot forwarding copy of Petitioner's facsimile to
4 Jeffrey C. Fritz. .

5 Date: January 7, 2004


6 Jac F. Pouliot
7 Attorney at Law
8 Law Offices of E. Gregory Alford
9 Attorneys for Respondent
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To : Jacques Pouliot
Sent : 10/27/2003 at 8:14:58 PM
Subject :

From : Cliff Roepke
Pages : 2 (including Cover)

Jacques:

Please forward this fax to Michele's attorney. Her fax machine keeps shutting down during transmission, and she is unwilling to speak with me on the phone to find an alternate means of delivery.

Cliff

Attention: Michele
Regarding: Thanksgiving Visitation
Date: 10/27/03

Cliff Roepke
Correspondence:
63 Bovet Road #234
San Mateo, CA 94402
cliff@slghtandsounds.com
VOX: 650.697.7081
FAX: 650.697.7089

Michele:

I have made travel plans to pickup Oliver after school at 12:00pm on 11/26/03 and fly up together with him to San Mateo to spend Thanksgiving with extended family.

Here is the itinerary for 11/26/03:

CLIFF: DOUBLETREE TO PICKUP OLIVER AT SCHOOL
11:00 AM-12:00 PM
CLIFF & OLIVER: SCHOOL TO SNA AIRPORT PARK
12:00 PM-1:30 PM
CLIFF & OLIVER: SNA AIRPORT PARK TO SNA
1:30 PM-2:30 PM
CLIFF & OLIVER: SNA TO SJC
3:40 PM-4:55 PM

Here is the itinerary for 11/30/03:

CLIFF & OLIVER: DRIVE TO SJC (INC PARKING)
10:00 AM-12:00 PM
CLIFF & OLIVER: DRIVE BACK SJC TO SM
10:00 AM-10:30 AM
CLIFF & OLIVER: SJC TO SNA
1:35 PM-2:50 PM
CLIFF & OLIVER: SAN TO SNA PARK
3:00 PM-3:30 PM
CLIFF & OLIVER: SNA PARK TO HOUSE
3:30 PM-5:00 PM

During Wednesday, Thursday, Friday, and Saturday nights, Oliver will be staying with me at the house in San Mateo. You know the phone number and address there. I will be arriving between 5:00pm and 6:00pm on Sunday night (11/30/03) to drop Oliver off to you at the Caminito Cielo Del Mar address.

Here is the Southwest itinerary for 11/26/03 & 11/30/03:

Wednesday, November 26 - ORANGE COUNTY CA(SNA) to SAN JOSE CA(SJC)
Flight 742 Y
Depart ORANGE COUNTY CA(SNA) at 03:40PM and
Arrive in SAN JOSE CA(SJC) at 04:55PM

Sunday, November 30 - SAN JOSE CA(SJC) to ORANGE COUNTY CA(SNA)
Flight 851 Y
Depart SAN JOSE CA(SJC) at 01:35PM and
Arrive in ORANGE COUNTY CA(SNA) at 02:50PM

Please have Oliver call me. I called both Wednesday (10/22) and Sunday (10/26) and left messages.

Cliff

October 30, 2003

Jeffrey C. Fritz, Esq.
Basie & Fritz
3638 Camino del Rio North, Suite 280
San Diego, CA 92108

RE: Roepke, Marriage of, SDSC FL Central, Case No. D472021 DUS

Dear Mr. Fritz:

Please find enclosed a facsimile dated October 27, 2003, from our client intended for Ms. Lally. Upon attempting delivery of the facsimile, her machine keeps shutting down during transmission and Ms. Lally is unwilling to speak with Mr. Roepke on the phone to find an alternative means of delivery.

We will appreciate your transmitting this information to Ms. Lally. Thank you for your kind attention to this matter.

Yours very truly,



Jac F. Pouliot
Attorney at Law
Law Offices of E. Gregory Alford
JFP/mft

Enclosure

cc: Clifford L. Roepke (w/o enclosure)

Attention: Michele
Regarding: Christmas Vacation
Date: 11/25/03

Cliff Roepke
Correspondence:
63 Bovet Road #234
San Mateo, CA 94402
cliff@slghtandsounds.com
VOX: 650.697.7081
FAX: 650.697.7089

Michele:

I am making arrangements for Oliver to spend the holidays up North in San Mateo. Since Grandma Liddy's birthday falls on December 26th, the Roepke Family has decided to forego Christmas and celebrate it on the 26th of December. Uncle Eric is making arrangements to come out for that date as well.

I have enclosed a copy of my proposed schedule. If you count the days, this is a good vacation itinerary, as it allows for Oliver to be back at home with you during the last weekend.

Since I can't seem to get through to your fax machine and I haven't received any alternative means to fax you, I am sending this through my lawyer's office to your lawyer's office. I need to have a response from you within about a week's time, as travel reservations need to be made. If I do not hear back from you, I am assuming the schedule is fine, as it follows the court order and allows Oliver to spend Christmas and Liddy's birthday with the Roepke Family. The weekend is there for Oliver to get ready for school.

Identical to Thanksgiving, I will send you an itinerary via our lawyer's faxes.

Cliff

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December 2003

December 2003							January 2004						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
1	2	3	4	5	6		4	5	6	7	8	9	10
7	8	9	10	11	12	13	11	12	13	14	15	16	17
14	15	16	17	18	19	20	18	19	20	21	22	23	24
21	22	23	24	25	26	27	25	26	27	28	29	30	31
28	29	30	31										

Monday		Tuesday		Wednesday		Thursday		Friday		Sat/Sun	
December 1		2		3		4		5		6	
BOS JULIAN RE LIGHTING DATE		8		9		10		11		12	
		DV EXPO		DV EXPO		DV EXPO		DV EXPO		DV EXPO	
15		16		17		18		19		20	
								OLIVER NOON CHRISTMAS BREAK		OLIVER: MICHELE	
										OLIVER: MICHELE	
22		23		24		25		26		27	
OLIVER: MICHELE		OLIVER: MICHELE		Christmas Eve (United States)		Christmas Day (United States)		OLIVER: (PLANE NORTH) CHRISTMAS		OLIVER: CHRISTMAS	
				OLIVER: MICHELE		OLIVER: MICHELE		WILL & CLIFF: OFF			
				8:00am WILL: VACATION		WILL & CLIFF: OFF				OLIVER: CHRISTMAS	
29		30		31		January 1, 2004		2		3	
OLIVER: CHRISTMAS		OLIVER: CHRISTMAS		New Year's Eve (United States)		New Year's Day (United States)		OLIVER: (PLANE RETURN) CHRISTMAS		OLIVER: MICHELE	
WILL: VACATION		WILL: VACATION		OLIVER: CHRISTMAS		OLIVER: CHRISTMAS		WILL: VACATION			
				8:00am WILL: OFF		WILL & CLIFF: OFF				OLIVER: MICHELE	

11/25/2003 6:59 PM

Cliff Roepke

February 2004

S		M		T		W		T		F		S	
4	5	6	7	8	9	10	11	12	13	14	15	16	17
11	12	13	14	15	16	17	18	19	20	21	22	23	24
18	19	20	21	22	23	24	25	26	27	28	29	30	31
25	26	27	28	29	30	31							

11/25/2003 6:59 PM

December 4, 2003

Jeffrey C. Fritz, Esq.
Basie & Fritz
3638 Camino del Rio North, Suite 280
San Diego, CA 92108

Via facsimile to 619 280-3040 and U.S.P.S.

RE: Roepke, Marriage of, SDSC FL Central, Case No. D472021 DUS

Dear Mr. Fritz:

Mr. Roepke has still been unable to get this facsimile through to Ms. Lally. Would you please forward this copy of the facsimile dated November 25, 2003, which is intended to notify Ms. Lally's of Mr. Roepke's schedule for his upcoming Christmas time share with Oliver.

Should you have any question, feel free to contact our office. Thank you for your kind attention to this matter.

Yours very truly,



Jac F. Pouliot
Attorney at Law
Law Offices of E. Gregory Alford
JFP/mft

Enclosures

cc: Clifford L. Roepke

TRANSMISSION VERIFICATION REPORT

TIME : 12/04/2003 10:38
NAME : GREGORY ALFORD
FAX : 6192393345
TEL : 6192324734

DATE, TIME
FAX NO./NAME
DURATION
PAGE(S)
RESULT
MODE

12/04 10:37
2803040
00:01:00
04
OK
STANDARD
ECM

FACSIMILE COVER PAGE

To : Jacques Pouliot
Sent : 12/11/2003 at 9:21:40 AM
Subject :

From : Cliff Roepke
Pages : 2 (including Cover)

Jacques:

Please forward this immediately to Fritz's office. I had to make reservations for this, and I don't need any "funny business" from Michele.

Thanks, Cliff

Attention: Michele
Regarding: Christmas Visitation
Date: 12/11/03

Cliff Roepke
Correspondence:
63 Bovet Road #234
San Mateo, CA 94402
cliff@signtandsounds.com
VOX: 650.697.7081
FAX: 650.697.7089

Michele:

I sent a fax to you through your attorney last week on the 4th concerning Christmas Vacation. I have not heard back from you over the week, so I am assuming that the schedule is as it is stated in the fax. It starts on Friday, December 26 at 12:00 noon, when I will pick him up in front of the clubhouse at Sunstream Del Mar. I will be traveling to San Diego to fly up with Oliver to spend Christmas with extended family. I will have him back on Friday, January 2nd, between 12:00PM and 1:00PM at the same clubhouse location.

Here is the itinerary for 12/26/03:

Depart Trip: San Diego to San Jose

Date	Day	Stops	Routing	Flight	Routing Details
Dec 26	Fri	N/C	CAN-CJC	2381	Depart San Diego (CAN) at 2:40 PM Arrive in San Jose (SJC) at 4:00 PM

Here is the itinerary for 1/2/04:

Return Trip: San Jose to San Diego

Date	Day	Stops	Routing	Flight	Routing Details
Jan 02	Fri	N/S	SJC-SAN	776	Depart San Jose (SJC) at 10:20 AM Arrive in San Diego (SAN) at 11:35 AM

During the week, Oliver will be staying with me at the house in San Mateo. You know the phone number and address there.

Cliff

December 11, 2003

Jeffrey C. Fritz, Esq.
Basie & Fritz
3638 Camino del Rio North, Suite 280
San Diego, CA 92108

Via facsimile to 619 280-3040 and U.S.P.S.

RE: Roepke, Marriage of, SDSC FL Central, Case No. D472021 DUS

Dear Mr. Fritz:

Here is a copy of a facsimile dated this date containing the Christmas vacation itinerary for Mr. Roepke's visitation with Oliver. We would appreciate your relaying this information to Ms. Lally.

Should you have any question, feel free to contact our office. Thank you for your kind attention to this matter.

Yours very truly,



Jac F. Pouliot
Attorney at Law
Law Offices of E. Gregory Alford
JFP/mft

Enclosure

cc: Clifford L. Roepke

Copy

TRANSMISSION VERIFICATION REPORT

TIME : 12/11/2003 10:41
NAME : GREGORY ALFORD
FAX : 6192393345
TEL : 6192324734

DATE, TIME	12/11 10:40
FAX NO./NAME	2803040
DURATION	00:00:49
PAGE(S)	02
RESULT	OK
MODE	STANDARD ECM

Michele Lally
P.O. 95
La Jolla, CA 92038
858.792.8100
fax 858.792.1010
Dec. 29, 2003

Attn. Mr. Pouliot,
1.619.232.4734
fax 1619.239.3345

You may want to inform your client Mr. Roepke that he is supposed to fax me with his requests not you and furthermore not my attorney, he complied with this agreement in Penny Angel-Levys office.

A fax machine only works if the faxing party is willing to use it, I do not nor have I ever had any complaints that my fax machine does not work. He stated to me that he would **NOT** fax me as he said in our agreement because it would cost more money for him to fax you and my attorney. Perhaps you are quite happy with this as you are the recipient of his money, alas I am quite sorry, but this is contrary to what we both agreed on and with what was filed in the courts. If he wishes to ring up unnecessary bills, I'm quite sure he can pay for all of them, as I can and will not since he is violating a court order. I also do not want Mr. Roepke calling my attorney any more, he has you after all. Please relay this message to your client. I have a proof of fax as usual.

Michele Lally

January 6, 2004

Jeffrey C. Fritz, Esq.
Basie & Fritz
3638 Camino del Rio North, Suite 280
San Diego, CA 92108

RE: Roepke, Marriage of, SDSC FL Central, Case No. D472021 DUS

Dear Mr. Fritz:

Please find enclosed a copy of a facsimile dated December 29, 2003, which was sent to our office from your client, Ms. Lally. Please advise Ms. Lally as to the impropriety of communicating with our office directly. Thank you for your kind attention to this matter.

Yours very truly,


Jac F. Pouliot
Attorney at Law
Law Offices of E. Gregory Alford
JFP/mft

Enclosure

cc: Clifford L. Roepke