

Answer to Temporary Restraining Order

Clerk stamps date here when form is filed.

FILED
Clerk of the Superior Court
APR 25 2007
By: M. ALSUP, Deputy

1 Name of person who asked for the order (protected person):
Michele Lally

2 Your name: Clifford L. Roepke

Your address (skip this if you have a lawyer): (If you want your address to be private, give a mailing address instead):

City: _____ State: _____ Zip: _____

Your telephone (optional): _____

Your lawyer (if you have one): (Name, address, telephone number, and State Bar number):

Jac F. Pouliot, Esq. SBN 62431

4025 Camino Del Rio South

San Diego, CA 92108-4108

(619) 542-7737

62431

Give the judge your answers to DV-100:

3 ☒ **Personal Conduct Orders**

I ☐ do ☒ do not agree to the order requested.

4 ☒ **Stay-Away Order**

I ☐ do ☒ do not agree to the order requested.

5 ☐ **Move-Out Order**

I ☐ do ☐ do not agree to the order requested.

6 ☒ **Child Custody**

a. I ☐ do ☒ do not agree to the custody order requested.

b. ☐ I am not the parent of the child listed in DV-105.

c. ☒ I ask for the following custody order (specify):

That the Court modify the sharing plan based

upon the soon-to-be-filed original and supplemental report by Dr. Stephen E. Doyne

d. I ☐ do ☒ do not agree to the orders requested to prevent child abduction.

7 ☒ **Visitation**

a. I ☐ do ☒ do not agree to the visitation order requested.

b. ☒ I ask for the following visitation order (specify): Same as 6.c.

8 ☒ **Child Support**

a. I ☐ do ☒ do not agree to the order requested.

b. ☒ I agree to pay guideline child support. as provided for in the Judgment of Dissolution of Marriage.

You must fill out, serve, and file Form FL-150 or FL-155.

9 ☐ **Spousal Support**

I ☐ do ☐ do not agree to the order requested.

Whether or not you agree, you must fill out, serve, and file Form FL-150.

Fill in court name and street address:

**Superior Court of California, County of
SAN DIEGO
SUPERIOR COURT OF CALIFORNIA
1501-55 SIXTH AVENUE

SAN DIEGO, CALIFORNIA 92101**

Clerk fills in case number:

Case Number:

D472021

The judge can consider your Answer at the hearing. Write your hearing date and time here:

**Hearing
Date**

Date: April 30, 2007 Time: 9:00 a.m.

Dept.: F-6 Room: _____

You must obey the orders until the hearing.

If you do not come to this hearing, the judge can make the orders last for 3 years or longer.

Exhibit B

Your name:

Cliff Roepke

Case Number:

D472021

10 ☐ **Property Control**I ☐ do ☐ do not agree to the order requested.If you have other requests, list them in **(19)** below.**11** ☐ **Debt Payment**I ☐ do ☐ do not agree to the order requested.

If you have other requests, list them in below.

12 ☐ **Property Restraint**I ☐ do ☐ do not agree to the order requested.If you have other requests, list them in **(18)** below.☐ **Attorney Fees and Costs**I ☐ do ☐ do not agree to the order requested.**14** ☐ **Payments for Costs and Services**I ☐ do ☐ do not agree to the order requested.☒ **Batterer Intervention Program**I ☐ do ☒ do not agree to the order requested.**15** ☒ **Other Orders** (see item 20 on Form DV-100)I ☐ do ☒ do not agree to the orders requested.**17** ☒ **Turn in guns or other firearms.**a. ☒ I do not own or have any guns or firearms.b. ☐ I ☐ have ☐ have not turned in my guns and firearms to the police or a licensed gun dealer.c. ☐ A copy of the receipt ☐ is attached. ☐ has already been filed with the court.

You must file a receipt with the court within 72 hours after receiving Form DV-110.

☐ **I ask the court to order payment of my**a. ☐ Attorney feesb. ☐ Out-of-pocket expenses because the temporary restraining order was issued without enough supporting facts. The expenses are:

Item: _____ Amount: \$ _____ Item: _____ Amount: \$ _____

You must fill out, serve, and file Form FL-150.

19 ☒ **My Answer to the Statements in DV-100 and Other Requests**

Please attach your statement. Write "DV-120, Item 19 — More Information" at the top. Be specific.

20 I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.Date: 4/24/07Clifford L. Roepke

Type or print your name

Sign your name 

Exhibit B

1 1. I am the Respondent on this matter. I have personal knowledge of the facts stated in the
2 declaration, except those stated on information and belief, which facts I believe to be true. I am
3 competent to testify to all of the facts stated herein, and if called upon by any court, I could and
4 would so testify.
5

6 **2. PERTINENT CASE HISTORY AND CASE STATUS.** The Petition in this matter was filed
7 on June 7, 2002.
8

9 3. The parties were married on July 30, 1994, and separated on December 22, 1996.

10 4. Following protracted litigation and settlement negotiations, the parties executed a Marital
11 Settlement Agreement. Pursuant to the terms of the Marital Settlement Agreement, the effective
12 date was December 26, 2006 (the dated signature of Respondent). The Marital Settlement
13 Agreement provides for a supplemental custody evaluation by Dr. Doyne.
14

15 5. The Judgment of Dissolution incorporating the Marital Settlement Agreement executed by the
16 parties was entered by the court of February 14, 2007.
17

18 6. The parties owned a jointly-owned residential property which the parties have agreed to place
19 on the market for sale. The address of the property is 3693 Caminito Cielo Del Mar, San Diego,
20 California.

21 7. Paragraph 25.b. of the Marital Settlement Agreement provides as follows: "The parties shall
22 agree on a listing broker within a reasonable time following the effective date of this
23 Agreement. Upon failure to do so, either party may appear ex parte where each party shall
24 submit three proposed brokers and have the Court pick the listing broker." The effective date of
25 the Marital Settlement Agreement was December 26, 2006.
26

27 8. It has now been 70 days since the effective date of the Marital Settlement Agreement yet no
28 attempt has been made by Petitioner to cooperate in the process of broker selection.

Exhibit B

1 9. Petitioner has had a history of dragging on the proceedings and of failure to cooperate.

2
3 10. Because of the drain on my financial resources (I am making all payments on the property in
4 lieu of child support payments, which payments exceed my child support obligation), it is
5 imperative that the property be listed for sale forthwith to avoid a potential foreclosure in the
6 event of my inability to continue making the payments.

7
8 11. Petitioner has been uncooperative with her signed stipulation agreement to sell our jointly-
9 owned property at 3693 Caminito Cielo Del Mar, San Diego, CA 92130. I-Pay One Services,
10 who was Michele's own personally-selected real-estate broker, fired us as their clients
11 because Petitioner failed to cooperate with ipayOne by not returning their phone calls, faxes,
12 or emails. Petitioner does not contribute a single penny to the mortgage, homeowners'
13 association dues, and property taxes related to this property, which well-exceeds child
14 support. Since Petitioner has had for several years exclusive control and possession of the
15 property, she has lived in the house rent-free and refuses to vacate the property, she is
16 creating delay tactics to impede the sales process. By filing this request for restraining orders,
17 I believe it is Petitioner's intention to create a barrier against me and my efforts to be present
18 at the property to meet with agents, appraisers, or prospective buyers to ensure the timely sale
19 of the property since Petitioner has had a history of not making herself available for the sale
20 process.
21
22

23
24 12. On April 2, 2007, Petitioner's attorney forwarded a letter to my attorney documentation
25 showing that Petitioner had signed a listing agreement with Prudential Realty. However, the
26 listing price she has insisted on is not realistic in light of current market conditions. Petitioner
27 has resisted my requests to obtain an independent appraisal, at my expense, to help us reach a
28 reasonable listing price. As of this date, the listing is still not executed. Furthermore,

Exhibit B

Petitioner has insisted that we install new flooring, an expense I do not see as necessary as this is not the kind of property lending itself to a "boutique" sale, not to mention the delays involved.

13. Petitioner has a long history of interfering with my relationship with our son, Oliver who is now 11 years old. He will turn 12 in June. In 2005, Michele was found guilty of two (2) counts of contempt of court for interfering with my custodial time. Since the restraining order would require me to stay away from Petitioner at any time at a prescribed distance, this would be added erosion to already limited contact with Oliver.

14. I am informed and believe that Dr. Doyne has now completed his supplemental evaluation of the child-sharing, as ordered in the Judgment of Dissolution, and the issuance of his supplemental report is imminent.

15. **PETITIONER'S REQUEST FOR TEMPORARY RESTRAINING ORDERS.** Petitioner has submitted to the court false accusations about me and alleged incidents of abuse. None of the incidents she describes in the DV-100 "Request for Order" ever occurred as she describes them, or in the instance of her most recent incident, ever occurred at all.

16. I believe that Petitioner has filed perjured declarations in order to further her own agenda. Firstly, I believe she intends to diminish the relevancy of a forthcoming court-mandated supplemental custody evaluation report from Dr. Steven Doyne by misrepresenting me with trumped-up incidents of abuse. I believe her hidden intention is to make me look like a violent and mean-tempered person. However, all the incidents she relates in her Request for Order were already discussed with Dr. Doyne in the course of his evaluation.

17. **PETITIONER'S ALLEGATION OF "MOST RECENT ABUSE"**. Petitioner states that the "date of the most recent abuse" was on 3/20/07. She specifies the persons present as "me

Exhibit B

1 this letter, my attorney simply stated that I would need to have access to the house, in case of
2 unavailability of Petitioner, in order to conduct appraisals and to assist in the sale of the house
3 pursuant to the stipulation that Petitioner had already signed relating to this issue. A copy of
4 that letter is attached as "**Exhibit A**". I have had no direct contact with Michele, simply
5 because Michele doesn't answer my phone calls or return any messages. She also has a call
6 blocking set for my fax machine and claims that she rarely reads her emails from the email
7 account she has listed on the Stella Maris School Registry.
8

9
10 20. Mr. Renkin subsequently verbally conveyed to my attorney Petitioner's absolute refusal to
11 provide a key to our jointly-owned property.
12

13 21. **CPS INVOLVEMENT.** Petitioner also declares in her application, "CPS called by son's
14 school principal 11/30/06." "Oliver afraid to go w/father during upcoming Christmas
15 Vacation. I was called to p.u. son from school." Further along, Petitioner declares in her
16 application, in response to the question 22.d. "Describe any use or threatened use of guns or
17 other weapons" that "son talks about being afraid of a knife in father's car."
18

19 22. There was an incident on or about November 30, 2006 when Oliver submitted a paper to his
20 teacher, Mr. Jeanson, where he stated that he was afraid of a knife in my car. Oliver's school,
21 Stella Maris, did contact Child Protective Services as a precaution and to file a mandatory
22 report. Soon thereafter, Petitioner, Oliver, and myself were interviewed by Dr. Doyne at his
23 office. In our initial meeting, I made it clear to Dr. Doyne that I believed Michele had a direct
24 hand in coercing Oliver to write the school paper. In my initial phone conversation with Dr.
25 Doyne immediately following the incident, Dr. Doyne asked me to explain my impression of
26 Oliver's paper. My first response to Dr. Doyne was to tell him that I did have a knife in my
27 car; however, contrary to Oliver's paper, he was fascinated with the knife, not scared of it.
28

Exhibit B

1 The last visitation I had had with Oliver, we had visited the Camp Pendleton Paintball
2 facility, when his paintball gun broke and we used my knife, which is a Leatherman's multi-
3 tool knife to fix Oliver's gun. If you are not familiar with a Leatherman's knife, they are
4 much like a Swiss army knife, just bigger, with a set of pliers, screwdriver, and other strong
5 tools. In short, it is a camping knife and the vehicle I drive is a fully-equipped Volkswagen
6 pop-top camper.
7

8
9 While inspecting Oliver's paintball gun, I took the knife out from the drawer and flipped it
10 open to get to the set of inner pliers. The clamp that holds the hopper of paintballs had come
11 loose and needed tightening. Oliver immediately asked if he could see the knife. I told him
12 that the knife was sharp and I really didn't want him playing with it. He insisted, and I let him
13 handle it for a second, then I put it away.
14

15 I told Dr. Doyne that I suspected Michele was somehow interrogating Oliver to "dig up
16 dirt" to diminish and make irrelevant his forthcoming court-mandated custody evaluation
17 report. Oliver's description was so far removed from what really happened, it seemed clear to
18 me that Petitioner took this information and somehow distorted it and morphed it into
19 something else in Oliver's mind. Dr. Doyne was very interested at the onset of our discussion
20 that Oliver and I enjoyed playing paintball together; he said that he was impressed with this
21 positive outing.
22

23
24 In his subsequent interview with Oliver, while Oliver was in Petitioner's presence, I am
25 informed and believe that Oliver denied ever playing paintball with me. He was emphatic
26 about it. Dr. Doyne then asked to have Oliver and me see him together. During this meeting,
27 Dr. Doyne confronted Oliver and asked whether he had played paintball with me. Oliver
28 confessed that he had. Dr. Doyne also asked Oliver why he felt it necessary to lie, and Oliver

1 said that he was under a lot of stress. Dr. Doyne also asked Oliver whether he ever felt
2 threatened by me, and Oliver answered "no." Dr. Doyne repeated this question several times
3 and even once more before we left his office. Each time Oliver said "no."
4

5 I received a letter several weeks later from Child Protective Services stating that the
6 charges were unfounded and that the case was dismissed.
7

- 8 23. **ALLEGATION OF SECOND MOST RECENT ABUSE.** In her Form DV-101
9 declaration, Petitioner alleges a second instance of abuse. In section 3 of her DV-101
10 declaration, Petitioner describes an incident that occurred in **December 2005**. Like most of
11 the other allegations in her declaration, this information is false. The event occurred on
12 December 26, 2004. I have attached as "**Exhibit B**" a calendar of December, 2004 through
13 January, 2005, indicating my time with Oliver. In her declaration, Michele paints a picture of
14 me as the aggressor in this instance, but reality is completely opposite to her claim.
15
16 24. The effective court order at the time stated in Section 1, Paragraph B: "Beginning in 2003, in
17 odd years Oliver shall be with his father for the week containing New Year's Eve and New
18 Year's Day, and with his mother for the week containing Christmas Eve and Christmas Day.
19 In even-numbered years, this schedule shall reverse." Since this was 2004, I was to have
20 Oliver for the week containing Christmas Eve and Christmas Day. I had made plane
21 reservations to go to San Mateo County to visit Oliver's grandparents and spend Christmas
22 with his extended family. I forwarded all of the required information regarding destinations,
23 flight numbers, and contact information through my attorney, Mr. Pouliot, several weeks
24 prior, to Michele's attorney ensuring Michele would received it. The plane reservations for
25 Oliver and myself were for economy class and non-refundable.
26
27
28

Looking at the dates, Oliver's school did not resume until Tuesday, January 4, 2005. On

Exhibit B

1 the calendar, I have labeled in pink the block dates I had informed Michele were to be spent
2 with Oliver visiting family in San Mateo. Additionally, that holiday adjoined existing
3 monthly parenting time that I normally spend with Oliver. I have labeled these dates in green.
4 Counting from the normal visitation weekend, I had planned to return Oliver to Michele at
5 9:00 a.m. on January 27, 2005. This would give Michele roughly equal time with Oliver for
6 her "week" containing New Year's Eve and New Year's Day and me for my "week" of
7 Christmas Eve and Christmas Day. I have labeled the dates for Michele's vacation time in
8 yellow. Counting December 26, 2004 as a travel day, the dates gave Michele equal visitation
9 time with Oliver. Since Monday January 3, 2005 was not a school day, Michele would have
10 Oliver for Monday, January 3, 2005 while I could travel with Oliver and allow him to
11 decompress from our travels on December 26, 2004, returning Oliver to Michele on the
12 morning of 12/27/04.

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Petitioner had ample time to contact me and object to the schedule. Instead, as I was
already with Oliver spending visitation and vacation time, my attorney advised me that she
was objecting to the schedule. Being so late in the process, my attorney and I agreed that
Michele had been irresponsible in her lack of communication and her objection was not
sufficient to try to change the itinerary, especially with non-refundable airline tickets.

Petitioner could have gone through the proper legal channels and could have appeared *ex parte* to contest the visitation schedule, but she chose not to do so. Instead, she chose to cause a confrontation.

On December 26, 2004, after vacation time spent in Northern California, at approximately 7:30 p.m., while exiting the security checkpoint at San Diego International Airport, Michele hid behind the flight status display kiosk to the left of the security checkpoint exit in Terminal

Exhibit B

1 B. I was walking with Oliver to the left of me, unaware that she was hiding behind the kiosk
2 in the distance ahead. Michele waited for Oliver and me to come close enough for her to
3 surprise us and attempt to take Oliver away. She came forward, grabbing Oliver by his left
4 arm and tried to take him away from me. Being totally caught off-guard, I had no idea what
5 Michele was intending to do. I feared that she was kidnapping our son, and my first instinct
6 was to protect my child. While calling for the police, I ran ahead of Michele and stopped her
7 from going any further down the terminal by blocking her against the same kiosk with my
8 shoulder and back where she had originally awaited in her ambush. When the police arrived
9 about a minute later, I let them take over the situation, and I cooperated completely with their
10 requests. After all, I was the one asking for police assistance. I explained to the police that
11 Michele had provokingly arrived at the airport unannounced and aggressively tried to take our
12 son. No charges were made.

16 Nearly two and a half years have passed since the incident, Michele has chosen to use this
17 as an incident involving abuse. Not only is the incident stale, **Petitioner was the aggressor**
18 **in this incident**. She had no business being there at the airport, especially with the clear
19 intent to provokingly abscond with our son by an unexpected ambush.

21 25. This incident has been raised during the custody evaluation with Dr. Doyne. Dr. Doyne has
22 made several interviews between Michele and myself and has his forthcoming report. I ask
23 that the court review his opinion on this matter prior to making any judgment on this incident.
24 I believe that the court will find that the incident is not as Michele describes, but is another
25 example of her many attempts to interfere with my relationship with our son, and part of a
26 larger pattern of alienation and control.

28 26. In paragraph 4 of her DV-101 declaration, Petitioner refers to incidents that date back to

Exhibit B

1 1996, 2001 and 2004. Again, these stale allegations have been aired during Dr. Doyne's
2 initial and supplemental evaluation
3

4 27. **FURTHER PERJURY BY PETITIONER.** In section 12 of her DV-100 declaration,
5 Petitioner states her address as 3693 Caminito Cielo Del Mar, San Diego, CA 92130. She
6 adds the words "he [myself] has never lived in this residence." This is patently false. I have
7 been the title holder on the property since I purchased the house, post-separation, in my own
8 name in the summer of 2001. I later added her name to the title. Following its purchase, I
9 lived in the house for several months before Michele took and packed all of my belongings
10 and changed the locks on the house. Since then, she has been living in the house rent-free,
11 and, unless the court intervenes, I fear that she will try to live there until I can no longer
12 afford the mortgage payments and lose the house through foreclosure.
13

14
15 28. In her Form DV-108, Petitioner states in section 4.f. that I continually take Oliver out of the
16 county without informing her. Again, this is patently false. I have given numerous
17 correspondences through my attorney and have given written information relating to
18 destinations and itineraries. Since our initial court-mandated mediation with Penny Angel-
19 Levy in 2001, Michele has had my cell phone number, which has not changed since then. I
20 have already described the fact that Michele does not respond to emails, and I cannot fax to
21 her number. She does not respond to any of my phone messages. On the other hand, I am
22 informed and believe through several unsolicited comments made by Oliver to me which
23 suggest that he has visited relatives on the East Coast with Petitioner without my knowledge
24 and consent. Petitioner was required to perform community service as part of her sentence for
25 conviction of contempt of court. On her community service paperwork, Petitioner states that
26 she fulfilled her requirement by working for a school on the East Coast. This is about the
27
28

Exhibit B

1 same timeframe that Oliver refers to when he was in that part of the country. Never once had
2 I ever received any information regarding Michele's plans to travel to the East Coast with
3 Oliver. Furthermore, while on another informed visit to Northern California, Oliver and I
4 were having breakfast in a coffee shop in Burlingame, near San Francisco. While at the
5 register, a young woman of approximately twenty years of age approached Oliver and spoke
6 to him by his first name. She greeted him with, "hello, Oliver, nice to see you again." I was
7 befuddled. Here was this woman, a total stranger to me, nearly five-hundred miles away from
8 San Diego, talking to Oliver as if they were good friends. I asked the woman how she knew
9 Oliver, and she said that she took care of him when Michele was doing work for the people
10 she lives with. She had seen Oliver just a couple of weeks prior. Oliver became immediately
11 agitated, and we left without my getting any personal information from the woman. This did
12 indeed happen, and it is a clear example of how Michele accuses me of something she has
13 done on several occasions. I, in turn, have always kept her informed of Oliver's whereabouts.

14 29. **CONFLICT IN TEMPORARY RESTRAINING ORDERS.** Since the Court granted the
15 Personal Conduct and Stay Away Temporary Restraining Orders, I am precluded from being
16 within 100 yards of Petitioner. Further, the Court, in denying Petitioner's other requests, also
17 ordered, as specified on page 2 of DV-140, that there shall be "No change in custody &[?] visitation orders at this time."

18 30. Unfortunately, the current order, i.e. the Judgment of Dissolution, specifies in paragraph 7
19 that "The party commencing exercise of child sharing shall be responsible for the child's
20 transportation from the school or the other party's home, as applicable, to his or her home."

21 31. Following discussion with my attorney, I decided to be on the safe side and deliver Oliver
22 upon termination of my latest visitation to the address specified in Petitioner's denied request
23
24
25
26
27
28

Exhibit B

(in item 12 of her DV-105 declaration), which is the address of her sister.

32. At 7:00 p.m., I arrived at the sister's address and walked Oliver up to the sidewalk. Looking to my right, I noticed that **Petitioner's car was parked in front of her sister's house.** I immediately stopped in my tracks and let Oliver continue on to the house and waited for him to enter. There is no doubt in my mind that Michele was at this house, as her sister, Dana, has her own car. If Michele is so afraid of me and asks the court to issue Restraining Orders to keep me away from her, why would she be at the place of exchange while the Temporary Restraining Order is in effect? She either had the intention to entrap me in a situation where I unknowingly violated the order, causing me to serve jail time. She obviously considers the situation as something less important than what she claims. Either way, it is a clear indication that Michele does not fear me in any way, since she should have suspected I would be at her sister's house at the specified drop off time.

33. This declaration clearly support the fact that these allegations of abuse are not only unfounded, but I believe they are part of a scheme by Petitioner to fabricate a lie about who I am and how I conduct myself. Given the circumstances of her earlier contempt of court charges, I ask the court to examine Petitioner's perjurious declarations in this particular proceeding. I ask the court to deny the restraining order and to dissolve the Temporary Restraining Orders. Otherwise, I will be asking the Court to specially set an evidentiary hearing to hear the matter fully.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 4/24/07

SIGNATURE BY FAX, ATTACHED

Clifford L. Roepke, Respondent

Exhibit B

Superior Court of California, County of San Diego
Roepke, Marriage of

Case No. D472021

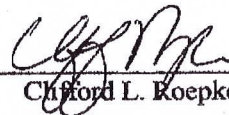
(in item 12 of her DV-105 declaration), which is the address of her sister.

32. At 7:00 p.m., I arrived at the sister's address and walked Oliver up to the sidewalk. Looking to my right, I noticed that **Petitioner's car was parked in front of her sister's house.** I immediately stopped in my tracks and let Oliver continue on to the house and waited for him to enter. There is no doubt in my mind that Michele was at this house, as her sister, Dana, has her own car. If Michele is so afraid of me and asks the court to issue Restraining Orders to keep me away from her, why would she be at the place of exchange while the Temporary Restraining Order is in effect? She either had the intention to entrap me in a situation where I unknowingly violated the order, causing me to serve jail time. She obviously considers the situation as something less important than what she claims. Either way, it is a clear indication that Michele does not fear me in any way, since she should have suspected I would be at her sister's house at the specified drop off time.

33. This declaration clearly support the fact that these allegations of abuse are not only unfounded, but I believe they are part of a scheme by Petitioner to fabricate a lie about who I am and how I conduct myself. Given the circumstances of her earlier contempt of court charges, I ask the court to examine Petitioner's perjurious declarations in this particular proceeding. I ask the court to deny the restraining order and to dissolve the Temporary Restraining Orders. Otherwise, I will be asking the Court to specially set an evidentiary hearing to hear the matter fully.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 4/24/07



Clifford L. Roepke, Respondent

Exhibit B

LAW OFFICE AND MEDIATION CENTER OF

TELEPHONE
(619) 542-7737

WEB SITE
www.familylawjfp.com

JAC F. POULIOT

ATTORNEY AT LAW
4025 CAMINO DEL RIO SOUTH, SUITE 300
SAN DIEGO, CALIFORNIA 92108-4108

FACSIMILE
(619) 542-7738

E-MAIL
jac@familylawjfp.com

March 20, 2007

Richard M. Renkin, Esq.
2635 Camino Del Rio So., Suite 108
San Diego, CA 92108

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

Dear Mr. Renkin:

Now that the parties have agreed to list the property at 3693 Caminito Cielo Del Mar, Mr. Roepke has already contacted ipayOne to move forward with the listing. Mr. Roepke will need to have a key to the joint property so that the property can be shown when your client is not available to do so. Also, the homeowner's association has notified Mr. Roepke that there are nails in the stucco that need to be removed. If they are not removed, the association will remove them and charge the parties. Mr. Roepke can take care of this matter to avoid the charge by the association.

Please advise when he can be provided with a key to the property as soon as possible. Should you have any question, feel free to contact my office. Thank you for your kind attention to this matter.

Yours very truly,



Jac F. Pouliot
Attorney at Law
Law Office of Jac F. Pouliot
JFP/mft

cc: Clifford L. Roepke

Exhibit A

December 2004

December 2004							January 2005						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
				1	2	3							1
5	6	7	8	9	10	11	2	3	4	5	6	7	8
12	13	14	15	16	17	18	9	10	11	12	13	14	15
19	20	21	22	23	24	25	16	17	18	19	20	21	22
26	27	28	29	30	31		23	24	25	26	27	28	29
							30	31					

Monday	Tuesday	Wednesday	Thursday	Friday	Sat/Sun
		December 1	2	3	4
		Cliff: SD	Cliff: SD	Cliff: SD	Cliff: SD
		8:00am Will & Stef: Lhuillier	9:00am Cliff: AMX Installer	8:00am Will & Stef: Lhuillier	Nan McDowell Notes
		NOTE	Traing	9:00am Cliff: AMX Installer	Nan McDowell Notes
		9:00am Cliff: AMX Installer	9:00am Will: Call re Lenzo DVD	Traing	
		Traing	12:00pm Stef: Reher		
					5
					Cliff: SD
					5:00pm Will: Flight to OC?
					5:00pm Will: Flight to OC?
	6	7	8	9	10
Cliff: SD	Cliff: SD	Cliff: SD	Cliff: SD	Cliff: SD	Cliff: SD
8:00am Will & Stef: Lhuillier	8:00am Will & Stef: Lhuillier ?	House Lift Cabinet Delive	9:00am Will: Antonio	8:00am Will & Stef: Hollister SC	10:00am Will: Flight to SJC?
8:30am Stef: Check Mail (Note)	9:00am Stef: Dave & Linda Diedert	Will: I Still Need Stef!	10:00am Cliff: Winn	and Pleasanton 1 hour service calls each	
8:30am Stef: Check Mail (Note)	9:00am Stef: Dave & Linda Diedert	6:00am Lena Tso Deposit on	10:00am Will & Stef: Dave & Karla	9:00am Cliff: Bank	12
5:00pm Will: Antonio	11:00am Lena Call	6:00am Lena Tso Deposit on	1:00pm Will & Stef: Lhuillier after		Cliff: SD
5:00pm Will: Antonio	2:00pm CLIFF INFO	4:30pm Stef: Chris Lenzo	5:30pm Will/Stef: Lenz		
6:00pm Deposited	2:00pm CLIFF INFO	4:30pm Stef: Chris	6:00pm Will/Stef		
13	14	15	16	17	18
8:30am Will: Johal	Cliff: SD (Monthly Visitation)	Cliff: SD (Monthly Visitation)	Cliff: SD (Monthly Visitation)	Oliver: 12:00 Dismissal	Cliff: SD (Monthly Visitation)
9:30am Stef: Jay Spangenberg	8:00am Will & Stef: Where are	9:00am Will & Stef: Lhuillier	Will & Stef: (Note)	WILL: IMPORTANT NOTE	3:55pm Cliff & Oliver: San to SJC
10:00am Will & Stef: Lhuillier whenever you finish	8:30am DISH PVR drop off p.	10:30am Will : Dr. Allen	8:00am Cliff: Vanagon Service	9:00am Will & Stef: Pat McDowell	
4:00pm Stef: Ralph Battat	9:00am DAILY NOTES	6:00pm STEF: DAILY NOTES	9:00am Will & Stef: Antonio	1:00pm Movie	19
6:00pm STEF: DAILY NOTES	10:00am Stef: Dave & Karla House		6:00pm Will/Stef: Play S. Clara	6:00pm Will/Stef: Daily Note *Great note--to the point!	Cliff & Oliver SF
	6:00pm Will/Stef: Daily Note				Cliff: SD (Monthly Visitation)
					8:00am Cliff & Oliver: Mission San Jose
20	21	22	23	24	25
Cliff & Oliver SF	Cliff & Oliver SF	Cliff & Oliver SF	Cliff & Oliver SF	Christmas Eve (United States)	Christmas Day (United States)
9:00am Stef: Returns	8:00am Deposit	6:00am Inventory	7:00am STEF: DR. APP	Cliff & Oliver SF	Cliff & Oliver SF
9:30am Will: Lhuillier	9:30am Will: Lhuillier	9:30am Will: Lhuillier	8:00am Will & Stef: Note	Will STEF : Day off (holiday)	
6:00pm Stef: Definate	6:00pm Pascoe Letter: Received	6:00pm STEF/Will DAILY NOTES	6:00pm Eric & Brit HACKMAN NOTE		
6:00pm STEF: DAILY NOTES	6:30pm Will/Stef Daily Note		6:00pm Will: MEETING NOTES LUHULLIER		26
					8:00am Eric & Brit
					6:00pm Cliff & Oliver Flight Back to SD
27	28	29	30	31	
Cliff: Oliver Back to Michele	Oliver: Michele	Oliver: Michele	Oliver: Michele	New Year's Eve (United States)	
Will STEF : Day Off	4:45am Cliff: Shuttle	Will: Lhuillier Punch List	Will STEF : Day Off	Oliver: Michele	
	7:00am Cliff: SAN to SJC	8:00am Will: Donald linn		Will STEF Day Off (holiday)	
	9:00am Will: Lhuillier Punch List	9:00am Stef: A&F SF Service Call			
	9:30am Stef: Rob & Lowell Sinclair				

January 2005

January 2005							February 2005						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
						1			1	2	3	4	5
2	3	4	5	6	7	8	6	7	8	9	10	11	12
9	10	11	12	13	14	15	13	14	15	16	17	18	19
16	17	18	19	20	21	22	20	21	22	23	24	25	26
23	24	25	26	27	28	29	27	28					
30	31												

Monday	Tuesday	Wednesday	Thursday	Friday	Sat/Sun
					January 1, 2005 New Year's Day (United S Oliver: Michele
					2 Oliver: Michele
3 Oliver: Michele	4 Oliver: School Resumes	5 Cliff: To Dos	6 8:00am Will & Stef: Lhuillier 4:00pm Stef: Emergency A&F SF Service Call 6:00pm STEF: DAILY NOTES	7 8:00am Will or Stef: Lhuillier 8:00am Will or Stef & Cliff: Lowell Sinclair	8 Cliff: CES 5:30am Cliff: Taxi to 7:30am Cliff: SFO to 3:00pm Cliff: Ben at 6:00pm Cliff: LAS to SFO
8:00am Will & Stef: Lhuillier (Plasma & Mount to arrive)	8:00am Will & Stef: Lhuillier	8:00am Will & Stef: Lhuillier 6:00pm Will/Stef Daily note			
10 8:00am Will Stef & Cliff: Lhuillier	11 8:00am Will & Stef: Lhuillier 11:45am Cliff: SJC to SAN 4:30pm Will: Garrat	12 8:00am Cliff: Vanagon Exhaust 2:30pm Stef: Reher 2:30pm Cliff: Doyne Apt (Canceled) 6:00pm STEF: DAILY NOTES	13 8:00am Will & Stef: Important 8:00am Will: Lhuillier 8:00am Cliff: 8:30am Stef: 8:30am VERY 12:00pm STEF: 6:00pm STEF: DAILY 6:00pm Will: Daily	14 8:00am Will: Lhuillier 8:00am Cliff: To Dos 10:00am Stef: Lary & Marti Frierso 10:00am Cliff: Doctors Apt 3:00pm Stef: Maria (Napa) 6:00pm STEF: DAILY	15
17 Martin Luther King Day (L	18 Cliff: To Dos Will: Possible A5Tek Day 11:00am Stef: Carters Milpitas... COMPLETE 1:30pm Will: Susan Hill	19 Cliff: Oliver 8:00am Cliff: VW & Call ADI 9:00am Will: John Carver 10:00am Cliff: Physical 1:00pm Steffen: 3:00pm Koppl 6:00pm STEF: DAILY	20 Cliff: Oliver Cliff: Sales Tax Due 9:30am Will: Mike & Diane Yancey 6:00pm STEF: DAILY NOTES	21 Cliff: Oliver Will: Downloak A5Tek So 8:00am STEF: DR. APPOINTMEN 10:00am Cliff: Physical Therapy	22 Cliff: Oliver
24 10:00am Cliff: Physical Therapy 2:30pm Cliff: Doyne Apt 6:00pm STEF/WILL Daily notes	25 Cliff: To Dos 9:00am Stef: Dr. appointme	26 8:00am Cliff: To Dos 8:00am Stef: Assist Will at Shop 8:00am Will: Media Server D&H 10:00am Cliff: Physical Therapy 6:00pm Will/Stef: Daily Note	27 8:00am Will/Stef: Shop 9:00am Stef: Depot/returns 6:00pm WILL/STEF DAILY NOTES	28 8:00am Stef: To Dos 8:00am Will: To Dos 10:00am Cliff: Physical Therapy	29
31 Cliff: Sales Tax Due Dave Nowak in Town 8:00am Cliff: Bank 9:00am Will call sara white					30