

PICKAWAY COUNTY JUVENILE/PROBATE COURT 207 S. COURT STREET,
CIRCLEVILLE, OHIO 43113

NAME: RADER V WITER

Case No: 2023-JUV-000044 CUS A

POSTING FOR: JOHN DOE

DATE POSTED: August 27, 2024

www.pickawaycourt.org/PublicNotices



Deputy Clerk

August 27, 2024
Date

Date Removed : _____



Deputy Clerk

Date

SHELLY R. HARSHA
JUVENILE COURT JUDGE
PICKAWAY COUNTY, OHIO

2024 AUG 27 AM 9:24

FILED

IN THE COURT OF COMMON PLEAS, PICKAWAY COUNTY, OHIO
JUVENILE DIVISION

FILED

2024 AUG 23 PM 3:13

REBECCA RADER
NKA REBECCA FOREMAN

CASE NO. 2023-JUV-044

JUDGE HARSHA

SHELLY R. HARSHA
JUVENILE COURT JUDGE
PICKAWAY COUNTY, OHIO

Plaintiff

-v-

MAGISTRATE CHARLES

JESSICA WITTER

NOTICE of POSTING

and

JOHN DOE

Defendants.

Father, John Doe, will take notice that an Emergency Multi Branch Motion, requesting that custody be modified and that custodian, Rebecca Foreman be designated as the legal custodian of Kai Lee Purdin, born October 28, 2022, has been filed in the Pickaway County, Ohio, Common Pleas Court, Juvenile Division on August 20, 2024, being Case No. 2023-JUV-044. The Motion alleges the following grounds: that Defendant, Mother, Jessica Witter is unfit and that her actions are negativity affecting the minor child's medical care and safety.

The Motion will be heard before said Court on **Monday, August 26, 2024, at 3:00 p.m. on Temporary Orders** at Pickaway County Courthouse, 207 South Court Street, Circleville, Ohio 43113 before Judge Harsha / Magistrate Charles.

You are hereby notified that: the granting of the Motion may result in the loss of valuable parental rights if you fail to appear for any hearing in the case.

Camille Chan

JUDGE / MAGISTRATE
PICKAWAY COUNTY COMMON PLEAS COURT
JUVENILE DIVISION
STATE OF OHIO

[Signature]

DEPUTY CLERK

STEELY LAW OFFICE
151 WEST FRANKLIN ST.
P. O. BOX 546
CIRCLEVILLE, OHIO 43113

(740) 477-2502
FAX (740) 477-1629
counsel@steelylaw.com

IN THE COURT OF COMMON PLEAS, PICKAWAY COUNTY, OHIO
JUVENILE DIVISION

REBECCA RADER
NKA REBECCA FOREMAN

Plaintiff

-v-

JESSICA WITTER

And

JOHN DOE

Defendants.

CASE NO. 2023-JUV-044

JUDGE HARSHA

MAGISTRATE CHARLES

LEGAL NOTICE FOR
PUBLICATION

SHELLEY A. HARSHA
JUVENILE COURT JUDGE
PICKAWAY COUNTY, OHIO

2024 AUG 23 11:11:07

FILED

Defendant, John Doe, father, whose last known address is unknown and whose current address is unknown, shall stake notice that on the 20th day of August, 2024, Plaintiff, Rebecca Foreman, has filed an Emergency Multi-Branch Motion to Modify Custody in the Pickaway County Court of Common Pleas, Juvenile Division, 207 South Court Street, Circleville, Ohio on August 20, 2024, being Case No. 2023-JUV-044.

The Motion alleges the following grounds: Defendant, Mother, Jessica Witter is unfit and that her actions are negativity affecting the minor child's medical care and safety. Plaintiff, Rebecca Foreman is requesting to be designated as the legal custodian of the minor child, Kai Lee Purdin, that Defendant, mother, Jessica Witter's parenting time be modified.


This matter is set for hearing before the Pickaway County Juvenile Court on the 27 day of September, 2024 at 2:00 a.m. / (p.m.) (the date must be 14

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days after the last date of publication). You may lose valuable rights if you fail to appear for any hearing in the case.

Date: 8-23-2024


Plaintiff



Rose K. Vargo McFarland #0081404
Attorney for Plaintiff,
Rebecca Foreman

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IN THE COURT OF COMMON PLEAS OF PICKAWAY COUNTY, OHIO
JUVENILE DIVISION

FILED
AUG 26 2024
SHELLY R. HARSHA
JUVENILE COURT JUDGE
PICKAWAY COUNTY, OHIO

NOTICE OF HEARING

Foreman, Rebecca

Plaintiff

Case No. 2023TUV-44

-v-

Witter, Jessica

Defendant

Notice is hereby given that the above captioned matter will be before the Court on September
27, 2024 at 2:00 PM in the County Court of Common Pleas, Juvenile Division.
This hearing is for purposes of hearing on temporary orders.

8/26/24
Date

Carrie Charles
Carrie Charles, Magistrate

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Notice of Hearing upon attorney for IT, Rose Vargo
and McFarland
By: Jessica Witter, Δ

Regular Mail

CC: _____

Certified Mail

Sheriff's Service

By Hand

Posted from Circleville, Ohio, on this 26th day of August, 2024.

Rose Vargo
IT, Rebecca Foreman through KKV 0081404

Jessica Witter
Δ, Jessica Witter, pro se

IN THE COURT OF COMMON PLEAS, PICKAWAY COUNTY, OHIO
JUVENILE DIVISION

REBECCA RADER
NKA FOREMAN
17697 Thompson Ridge Rd
Laurelville, OH 43135

Plaintiff,

-v-

JESSICA WITTER
1120 Overlook Drive
Ashland, OH 44805

and

JOHN DOE
Address unknown

Defendants.

CASE NO. 2023-JUV-044

JUDGE HARSHA

MAGISTRATE CHARLES

EMERGENCY MULTI-BRANCH
MOTION & MEMORANDUM FOR
TEMPORARY ORDERS

FILED
FEB 20 PM 1:43
SPENCER R. HARSHA
JUVENILE COURT JUDGE
PICKAWAY COUNTY, OHIO

MOTION

Now comes Plaintiff, Rebecca Foreman, by and through her attorney, Rose K. Vargo McFarland, and moves this Court for an order regarding the allocation of custodial rights and responsibilities, terminating the signed Shared Custody Agreement, and award supervised parenting time to Defendant with the minor child, Kai Lee Purdin, born October 28, 2022.

BRANCH ONE

Plaintiff respectfully requests this Court issue an emergency temporary order naming the Plaintiff the residential custodian and legal custodian of the minor child, Kai Lee Purdin, to stop the Defendant for taking action which would negatively affect the minor child's medical care and safety.

BRANCH TWO

Plaintiff respectfully requests this Court issue an emergency temporary order granting the Defendant supervised parenting time at the visitation center.

BRANCH THREE

Plaintiff respectfully requests this Court issue an order regarding the reallocation of custodial rights and responsibilities of the minor child, Kai Lee Purdin, born October 28, 2022, terminating the signed Shared Custody agreement signed by the parties finding Defendant, mother, Jessica Witter unfit and nominating the Plaintiff, Rebecca Foreman the legal custodian of the minor child, Kai Lee Purdin, born October 28, 2022.

BRANCH FOUR

Plaintiff requests an order restraining Defendants from removing the minor child from the jurisdiction of this Court.



Rose K. Vargo McFarland #0081404
Attorney for Plaintiff,
Rebecca Foreman

MEMORANDUM

The grounds for Plaintiff's motion are more fully set forth in his Affidavit, a copy of which is attached hereto as "Exhibit A".

Respectfully submitted,



Rose K. Vargo McFarland #0081404
Attorney for Plaintiff,
Rebecca Foreman

**IN THE COURT OF COMMON PLEAS
PICKAWAY COUNTY, OHIO**

**REBECCA RADER
KNA FOREMAN**

Plaintiff/Petitioner

-v-/and

JESSICA WITTER

Defendant/Petitioner

CASE NO. 2023-044

JUDGE HARSHA

MAGISTRATE CHARLES

2024 AUG 20 PM 1:42
 SHERILLY R. HARSHA
 JUDGE
 PICKAWAY COUNTY, OHIO

FILED

Instructions: Check local court rules to determine when this form must be filed. By law, this affidavit must be filed and served with any Complaint, Petition or Motion regarding the allocation of parental rights and responsibilities, parenting time, custody, or visitation. Each party has a continuing duty while this case is pending to inform the Court of any parenting proceeding concerning the child(ren) in any other court in this or any other state. **If more space is needed, add additional pages.**

PARENTING PROCEEDING AFFIDAVIT (R.C. 3127.23(A))

Affidavit of REBECCA RADER NKA FOREMAN

(Print Name)

ONLY CHECK THE FOLLOWING BOX IF YOU BELIEVE THAT THE HEALTH, SAFETY, OR LIBERTY OF YOURSELF OR YOUR CHILD(REN) WOULD BE JEOPARDIZED BY THE DISCLOSURE OF YOUR ADDRESS OR IDENTIFYING INFORMATION. YOU ACKNOWLEDGE THAT THE COURT MAY CONDUCT A HEARING REGARDING THE BASIS FOR YOUR REQUEST.

Pursuant to R.C. 3127.23(D), I allege that my health, safety, or liberty or that of my child(ren) would be jeopardized by the disclosure of identifying information to my spouse or the public. Therefore, I request that my address be placed under seal. I have marked the corresponding box next to each address I am requesting to be sealed.

1. (Number): 1 Minor child(ren) is/are subject to this case as follows:

Insert the information requested below for all minor or dependent children of the parties. You must list the residences for all places where the children have lived for the last **FIVE** years.

a. Child's Name:		Place of Birth:	Date of Birth:	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	
Kai Purdin		Circleville, OH	10/28/2022		
Period of residence		Address Confidential	Person child lived with (name and address)		Relationship
1/5/2023	To Present	<input type="checkbox"/>	Rebecca and Tyler Foreman 17697 Thompson Ridge Rd, Laurelville, OH		Guardians
5/10/2024	To Present	<input type="checkbox"/>	Jessica Witter and Bobbie Witter 635 Kaler Ave, Bucyrus, OH		Mother and Adopted Maternal Grandmother
	To Present	<input type="checkbox"/>	Jessica Witter and David Witter 1120 Overlook Dr. Ashland, OH 44805		Mother and Adopted Maternal Grandfather
10/9/2023	To 11/13/23	<input type="checkbox"/>	Jessica Witter and Jennifer Bakare 169 Caroline Court, Circleville, OH		Mother and mother's friends

1/16/2023	to	10/9/2023	<input type="checkbox"/>	Jessica Witter 111 Island Rd, Circleville, OH	Mother
10/28/2023	to	1/5/2023	<input type="checkbox"/>	Jessica Witter 510 Renick Ave, Lot 25, Circleville, OH	Mother
	to		<input type="checkbox"/>		

b. Child's name		Place of birth	Date of birth	Sex <input type="checkbox"/> M <input type="checkbox"/> F
Date of residence	Address Confidential	Person(s) child lived with (name and address)		Relationship
	<input type="checkbox"/>			
	<input type="checkbox"/>			
	<input type="checkbox"/>			
	<input type="checkbox"/>			

c. Additional children are listed on Attachment 1(d). (Provide requested information for additional children on an attachment labeled 1(d).)

2. Participation in custody case(s): (Check only one box)

I HAVE NOT participated as a party, witness, or in any capacity in any other case, in this or any other state, concerning the custody of or visitation (parenting time), with any child subject to this case.

I HAVE participated as a party, witness, or in any capacity in any other case, in this or any other state, concerning the custody of or visitation (parenting time), with any child subject to this case.

Explain: Filed for Partial custody, awarded 5/10/2023. Filed for full custody 11/14/2023, dismissed.

a. Name of each child: Kai Purdin

b. Type of case: Custody

c. Court and State: Pickaway County, Ohio

d. Date and court order or judgment (if any): May 10, 2023 and May 7, 2024

3. Information about custody case(s): (Check only one box)

I HAVE NO INFORMATION of any cases that could affect the current case, including any cases relating to custody; domestic violence or protection orders; dependency, neglect, or abuse allegations; or adoptions concerning any child subject to this case.

I HAVE THE FOLLOWING INFORMATION concerning cases that could affect the current case, including any cases relating to custody; domestic violence or protection orders; dependency, neglect, or abuse allegations; or adoptions concerning a child subject to this case, other than listed in Paragraph 2.

Explain: _____

- a. Name of each child: _____
- b. Type of case: _____
- c. Court and State: _____
- d. Date and court order or judgment (if any): _____

4. Information about criminal convictions:

List all of the criminal convictions, including guilty pleas, for you and the members of your household for the following offenses: any criminal offense involving acts that resulted in a child being abused or neglected; any domestic violence offense that is a violation of R.C. 2919.25; any sexually oriented offense as defined in R.C. 2950.01; and any offense involving a victim who was a family or household member at the time of the offense and caused physical harm to the victim during the commission of the offense.

NAME	CASE NUMBER	COURT/COUNTY/STATE	CHARGE
Jessica Witter	CRB 2201538	Circleville Municipal Court	Criminal Mischief

5. Persons not a party to this case: (Check only one box)

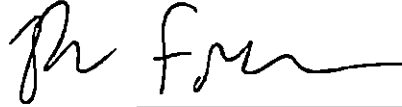
- I DO NOT KNOW OF ANY PERSON not a party to this case who has physical custody or claims to have custody or visitation rights with respect to any child subject to this case.
- I KNOW THAT THE FOLLOWING NAMED PERSON(S) not a party to this case has/have physical custody or claim(s) to have custody or visitation rights with respect to any child subject to this case.

- a. Name/Address of Person: _____
 has physical custody claims custody rights claims visitation rights
 Name of each child: _____
- b. Name/Address of Person: _____
 has physical custody claims custody rights claims visitation rights
 Name of each child: _____
- c. Name/Address of Person: _____
 has physical custody claims custody rights claims visitation rights
 Name of each child: _____

6. I understand that I have a continuing duty to advise this Court of any custody, visitation, parenting time, divorce, dissolution of marriage, separation, neglect, abuse, dependency, guardianship, parentage, termination of parental rights, or protection order from domestic violence case concerning the children about whom information is obtained during this case.

OATH OR AFFIRMATION
(Do not sign until Notary Public is present)

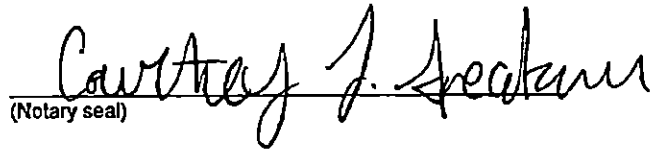
I, **REBECCA FOREMAN**, swear or affirm that I have read this Affidavit and, to the best of my knowledge and belief, the facts and information stated in this Affidavit are true, accurate, and complete. I understand that if I do not tell the truth, I may be subject to penalties for perjury.



Rebecca Foreman

STATE OF OHIO)
) SS
COUNTY OF PICKAWAY)

Sworn to or affirmed before me by **REBECCA FOREMAN** this 16th day of August, 2024.



(Notary seal)



COURTNEY L SPEAKMAN
Notary Public
State of Ohio
My Comm. Expires
August 12, 2028