

**IN THE FAMILY COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI**

In re: The Matter of:)	
ANGELA FREINER,)	
)	
Petitioner,)	
)	Cause No. 14SL-DR02617-01
vs.)	
)	
JAMES S. JUDY,)	Division: 31
)	
)	
Respondent.)	

MEMORANDUM ALERTING COURT TO INCONSISTENCY IN JUDGMENT

COMES NOW, Petitioner, by and through counsel, Hais, Hais & Goldberger, P.C., and alerts the Court to the following newly-discovered, important, and timely issue:

- 1) On or about August 28, 2020, this Court entered a Judgment of Modification and Parenting Plan in this case.
- 2) Presently, the Court is considering Petitioner’s timely-filed Motion for Rehearing/Motion to Reconsider.
- 3) Per the Court’s calculation, the deadline for ruling upon the post-trial motions in this case is quickly approaching on December 26, 2020.
- 4) It was recently discovered that there is a significant inconsistency in the parenting plan that this Court entered:
 - a. The Holiday Schedule of the Parenting Plan provides that Mother and Father shall alternate who has the child for Christmas Day (December 25th).
 - b. The Holiday Schedule also provides that Mother shall have the minor child on Mother’s Birthday (December 25th) every year.
 - c. This is an inconsistency that requires some clarification or modification by the

Court.

- 5) The parties have attempted to figure out what to do this Christmas holiday this year, but have been unable to determine what to do.
- 6) This issue was recently discovered as the parties were attempting to determine who is to receive the minor child for Christmas this year.
- 7) It should be noted that Mother did not write this parenting.

HAIS, HAIS & GOLDBERGER, P.C.

/s/ Daniel Zdrodowski

By: _____

Susan M. Hais, #25165
Daniel Zdrodowski, #67020
222 S. Central Avenue, Suite 600
Clayton, Missouri 63105
(314) 862-1300
(314) 862-1366 (Fax)
Email: susan@hgg-law.com
Email: daniel@hgg-law.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was served upon all parties of record by way of Missouri electronic filing on this 12/14/2020. It was also emailed to the Judge, GAL, and opposing counsel.

/s/Daniel Zdrodowski
