

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY  
STATE OF MISSOURI

JAMES S. JUDY	)	
	)	
Petitioner,	)	
vs.	)	Cause Number:
	)	
ANGELA M. FREINER	)	Division:
	)	
Respondent.	)	
Special Process Server Requested:	)	

APPLICATION FOR WRIT OF HABEAS CORPUS

COMES NOW Petitioner, James S. Judy, hereinafter “Father” and for his Application for Writ of Habeas Corpus states to the Court as follows:

1. It is in the best interest of the minor child that the Court grant a Writ of Habeas Corpus ordering Respondent and, as necessary, law enforcement, to produce the parties’ minor child, Dalilah Judy to Petitioner who shall be granted the sole physical and sole legal custody of the minor child until further order of the Court.
2. In support thereof, Petitioner states as follows:
  - a. Mother refuses to return the minor child to Father in contumacious disregard of this court’s modification judgment of **August 28, 2020** awarding to Father residential custody of the parties’ child.
  - b. Mother refuses to return the minor child to Father in contumacious disregard of this court’s Temporary Restraining Order dated **January 15, 2021**.
  - c. Mother refuses to return the minor child to Father in contumacious disregard of this court’s Preliminary Injunction Order dated **February 3, 2021**.

WHEREFORE Petitioner prays this Honorable Court for its Writ of Habeas Corpus ordering Respondent or law enforcement, as may be necessary, to produce the minor child in accordance with this Court's Judgments.

STATE OF MISSOURI )  
 ) SS  
COUNTY OF ST. LOUIS )

James S. Judy, the Petitioner herein, being duly sworn upon his oath, deposes and states that the facts contained in the foregoing Application for Writ of Habeas Corpus are true and correct according to his best knowledge, information and belief.

James S. Judy  
James S. Judy

Subscribed and sworn to before me this 3rd day of February, 2021.

Lindsey Elizabeth Blase  
Notary Public

My commission expires: 6/26/24



Respectfully submitted by:  
LAW OFFICES OF KATHLEEN E. SHAUL, PC

Kathleen E. Shaul

Kathleen E. Shaul, #46615  
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## CERTIFICATE OF SERVICE

A copy of the above and foregoing has been sent this 4th day of February, 2021 to: Angela M. Freiner, Respondent, 8547 Pilot Ave, St. Louis, MO 63123 via USPS; and via electronic filing to: Venus Jackson, Esq., Venusesquire@sbcglobal.net .

/s/ L.Blase \_\_\_\_\_