

DISTRICT COURT, JEFFERSON COUNTY, COLORADO 100 Jefferson County Parkway Golden, Colorado 80401 Telephone: (303) 271-6190	<hr/> ▲ COURT USE ONLY ▲ <hr/> trial court case No. 99 DR 3717 Div. 9 / Hon. Jack Berryhill
In re the Marriage of: Petitioner: CHRISTY RYAN and Respondent: SEAN HARRINGTON	
Sean L Harrington P.O. Box 351855 Westminster, CO 80035	
Father’s Reply in Support of Motion for Declaratory Judgment and Protective Order and Motion for Sanctions Against Attorney CFI Madeline Wilson	

In reply to the Response to Sean Harrington’s Motion for Declaratory Judgment and for Case Management Order filed on behalf of mother’s attorney-of-record (“Wilson”), Respondent (“father”) states as follows:

1. [Wilson’s Answer](#) is grossly untimely, filed 42 days after [father’s Motion](#) was docketed and without leave to file out of time. The Answer should be stricken. Wilson has argued many times that non-lawyers are charged with the knowledge of lawyers in civil proceedings and are entitled to no exemptions under the Rules.¹ Therefore, it follows that *lawyers* are charged with the knowledge of lawyers and “Parties litigant have a right to rely upon the rules as written. It is the duty of trial courts, as well as our duty, to enforce them when timely objection is made by a party to litigation.” *Capitol Indus. Bank v. Strain*, 442 P.2d 187, 188 (1968).

2. Wilson’s Statement of Facts asserts that the appeals court stated on remand in [Harrington IV](#) that “the [trial] court should determine whether our remand in [Harrington II](#) has been carried out or whether it is no longer necessary, and enter any orders it deems necessary.” Answer at 2. This assertion is relied upon to support Wilson’s lead argument that the “only issue on remand is the allocation of fees for Dr. Fyfe.” Clearly, Wilson is not reading from the same opinion: the *Harrington IV* remand directed the trial court to also carry out the mandate in [Harrington III](#) (04CA1986), wherein the appeals court stated:

¹ See, e.g., ¶ 5 of mother's September 3, 2004 Responsive pleading filed in *Harrington II* (“While the father has chosen to represent himself *pro se*, the father is charged with the knowledge of an attorney”) (citing *People v. Romero*, 694 P.2d 1256 (Colo.1965)).

Here, the record does contain affidavits concerning the conversations father had with the special advocate after the May 2004 order, but it appears that the trial court did not consider them . . . the trial court summarily denied father's request to disqualify the special advocate. However, in the absence of specific findings, we are unable to evaluate the propriety of the court's determination or ascertain if the court considered whether any of the standards previously applicable to special advocates (or currently concerning child and family investigators) were violated . . . Thus, we conclude that a remand is necessary for such review.

August 3rd 2006 [Opinion at 4](#) (not published pursuant to C.A.R. 35(f)). The Court of Appeals provided guidance to its general remand, noting that this case was not moot, citing *Reifschneider v. City & County of Denver*,² for the proposition that the need to deter inappropriate conduct did not disappear and to address father's claim that he had necessarily incurred fees as result of challenged conduct.³

3. Next, Wilson argues that there is no need to allocate fees for Mr. Fyfe's services because he has already withdrawn from the case and waived the fees in question and, therefore, the Court has nothing left to decide on remand. Answer at 2. Ms. Wilson is not a party to this case and, therefore, can express no opinion without violating Rule 3.7. Wilson has no legal standing to litigate any issues with respect to Mr. Fyfe and she has not filed a Motion to Intervene pursuant to Rule 24. Finally, the argument is unavailing and has been fully briefed in Father's Motion for Summary Judgment, Reply in Support of Motion for Summary Judgment, and Reply in Support of Objection to Entry of Appearance on behalf of the Special Advocate, Bill Fyfe. Father incorporates by reference his arguments herein.

² 917 P.2d 315, 319-20 (Colo. App. 1995)

³ *Harrington IV*, No. 07CA379 (Colo.App., May 29, 2008) (unpublished pursuant to C.A.R. 35(f)) at 4-5. As noted by the appeals court, father is seeking the reimbursement of fees paid to Fyfe, fees paid to Dana Cogan, M.D. and attorney fees paid to attorney Karen Renne, Ph.D. Father is also asking this Court to enter specific findings regarding Mr. Fyfe's conduct and to remove him or recommend his removal from the rolls of divorce industry experts used by the Court.

4. Wilson's next argument is that § 3.3 of the Agreement (referencing a "no contact order" that was never drafted or obtained) clearly means no more and no less than "no contact" and that this means that father need not serve Ms. Wilson under Rules 5 or 121. Although father interprets this **new argument** as a waiver of all future service (absent any further direction from the court), this has not always been Wilson's position. In Jefferson County case No. 00C07880 (*Harrington v. Wilson, et al.*), Wilson filed a Motion to Quash Service on July 28, 2000, arguing *pro se*, "The Complaint was NOT served upon Ms. Wilson as required by C.R.C.P. 4(c)," while a restraining order was then in effect.

5. Wilson has made no effort to contest the fact that Wilson has invited contact from father on numerous occasions, constituting license, waiver and acquiescence. Father's Motion at ¶¶ 11-12.

6. Wilson does not deny her extensive history of abuse-of-process (Father's Motion at ¶ 17) or dispute that the Court of Appeals in *Harrington I* found that she had manipulated the Rules of Civil Procedure or that the court-appointed special advocate, Natalie Van Note, specifically found that Ms. Wilson had abused process in this case and engaged in deception. Father's Motion at ¶ 18. Wilson not only attempted to serve father with her vendetta contempt motion in Texas, but as the attached November, 2005 email exchange between Wilson and mother indicates, she also intended to serve father with yet another (sixth) frivolous restraining order when father arrived in Colorado for a scheduling conference at the federal court house in Denver on December 7th 2005.⁴ In another email, dated November 28th 2005, her co-conspirator (mother) confirmed the plan.⁵

7. Wilson does not deny that she provided substantial encouragement and assistance in the concealment of the minor child in Texas from the father, in violation of § 1.14 of this Court's November 6, 2001 Stipulated Agreement. Father's Motion at ¶ 16. Wilson disregarded four certified letters from father between 2003 and 2004 seeking the

⁴ The email is attached hereto and incorporated herein by reference as [Exhibit "A"](#)

⁵ The email is attached hereto and incorporated herein by reference as [Exhibit "B"](#)

whereabouts of his daughter. A March 7, 2005 email is one of several emails now in father's possession containing direct evidence of the aiding and abetting.⁶

In this particular email, Wilson acknowledged that father was legally entitled to information as to the whereabouts and welfare of his daughter, but coached mother to: characterize falsely her flight to Texas as an "escape" from Colorado (even though father has not lived in Colorado since December of 2000); claim falsely that father had threatened to kidnap the child; and claim falsely that father had stalked mother to Texas, (even though father had not been to Texas in several years at that time).

In another email, dated June 10, 2005, Wilson acknowledged that father was entitled to speak with his daughter by telephone, but —only after he located mother in Texas with the help of a private investigator— Wilson suggested that the case be transferred to Texas to further frustrate father's ability to restore his parental relationship with his child.⁷

In another email, dated January 18th 2005, Wilson explains that the only reason she remains on the case is to prevent the possibility of "*an order giving him parenting time or something else you wouldn't like.*"⁸

In yet another email, concerning a police welfare check that father requested after he located the address of his missing child, Wilson wrote mother, "*Psycho probably told them you keep her chained in the back room drooling and starving. They will get a bead on psycho because he "cries wolf" WAY too much. :)*"⁹ This statement, coming from a woman who has claimed that father has her address since the year 2000 with detailed plans to kill her and her children and that she has had to advise her children to flee Colorado and change their names therefor, indicates both she and mother have been experiencing a great deal of schaudenfreud at the expense of the minor child and father during these last nine years. For Wilson, this entire matter has been one big joke.

8. In addition, Wilson gave false statements to the State Bar of Texas Office of Chief Disciplinary Counsel. In her November 14, 2007 Answer, she stated, that "*In no way did*

⁶ The email is attached hereto and incorporated herein by reference as [Exhibit "C"](#)

⁷ The email is attached hereto and incorporated herein by reference as [Exhibit "D"](#)

⁸ The email is attached hereto and incorporated herein by reference as [Exhibit "E"](#)

⁹ The email is attached hereto and incorporated herein by reference as [Exhibit "F"](#)

I ‘aid or abet’ the mother in ‘concealment’ of the child as alleged by the Complainant once again in his grievance . . . I do not have my client’s physical address.”

This was a material misrepresentation, to put it politely: A printer spool file located on mother’s computer is a memorandum dated January 4, 2005 —just a few days after mother had arrived in Texas— notifying Wilson of her arrival and specifically disclosing that she was “staying with my mom to help take care of her,” and directing Wilson to mislead father to believe that mother was still in Colorado.¹⁰ This fraud amounted to a conspiracy because Wilson asked mother to approve of her Answer to the Chief Disciplinary Counsel, as evidenced by an email from Wilson dated April 25, 2006.¹¹

Wilson also misled the Texas disciplinary authorities in denying that she had been providing legal advice to mother in Texas regarding the situation in Texas. In her [November 14, 2007 Answer](#), she wrote:

I do not know what he is writing about regarding providing advice to a former client in Texas and concerning conduct and transactions in Texas. The only time I practiced in Texas was as a third-year bar student with St. Mary's University Poverty Law Clinic. I can only assume he is guessing I am providing legal advice to his former wife regarding the Texas case. Ms. Ryan is represented by counsel in Texas and I am not current on Texas Family Law and would not feel comfortable providing such advice. People often attempt to hire me to handle Colorado-Texas cases and I always refer them to others as I practice and stay current in Colorado.

As clearly established by the language of the email Exhibits “C” and “D,” Wilson was providing legal advice to Ms. Ryan about matters that had nothing do with any litigation pending in Colorado. She lied to the attorney disciplinary authorities, expecting never to get caught.

9. In addition to this evidence furnished hereinabove, Wilson has sent a number of misandrist emails to mother which have nothing whatever to do with the litigation or the attorney client relationship. The nature of these emails not only provides insight into the

¹⁰ The memo is attached hereto and incorporated herein by reference as [Exhibit “G”](#)

¹¹ The email is attached hereto and incorporated herein by reference as [Exhibit “H”](#)

conduct of Wilson and mother over the last nine years in this case, but also raises serious questions about Wilson's fitness to serve as a Child and Family Investigator.

- One email is captioned, "If only . . . hahahahah" and the message body consists of the following:


Man driving down road. '
Woman driving up same road.
They pass each other.
Woman yells out window, "P I G !"
Man yells out window, " B I T C H "
Man rounds next curve..
Crashes into a huge pig in middle of road.
Thought For The Day : If only men would listen...

- Another message (May 1, 2006) is captioned, "Fwd: From thesmokinggun.com: Charlie Sheen Divorce Bombshell" In addition to the forwarded link, there is a private message, "Why I hate men."
- Another message (September 11, 2003), which appears to have been copied to former judge **Judy Archuleta** (jarchuleta@70001.PJC.com) is captioned, "[Fwd: FW: Candidates for Man of the Year]" and includes the three photographs appearing on the following page:

10. In light of the evidence gathered and presented herein and the conduct of Wilson and mother over the course of this case, it is little wonder why a young child has been made to pay the heavy price of being without her father for the last nine years. These are not the actions of an attorney acting zealously on behalf of her client. These are the actions of a reckless individual without any sense of right or wrong. Madeline Wilson is an embarrassment to the legal profession in Colorado and to all women. She should be enjoined from any role as a child and family investigator and from any role where she has the opportunity to further destroy the lives of innocent children in pursuit of her greed and radical feminist ideologies.

WHEREFORE, for the foregoing reasons and based on the foregoing authorities, father requests that this Court refer this matter to the Attorney Regulation Counsel, impose sanctions upon Ms. Wilson under Rule 11, and for other such relief as is appropriate under these circumstances.

Dated this 20th day of November, 2008.


Sean L. Harrington



**SEE PREVIOUS PAGE FOR
EXPLANATION OF THESE PHOTOS**

CERTIFICATE OF MAILING

I hereby certify that on the 21st day of November, 2008, a true and accurate copy of the foregoing *REPLY* has been mailed, first class postage prepaid, to the following:

First Judicial District Court
Division 9
100 Jefferson County Parkway
Golden, CO 80401

and by facsimile to: Law Office of Madeline Wilson at: 303-321-3196; and
by electronic mail to: David H. Yun (DYun@jalegal.com) and
Brett N. Huff (bhuff@huffandleslie.com)



Madeline,

Shelby saw TJ Price for years, and he's the only one she saw in Denver. I don't know who the other guy is. What does your ex-husband have to do with anything???? I spoke with Randy on Fri. and he told me about the upcoming conference. Are you going?

Christy

I'm going to the conference if the case I have that day settles. I am considering having him served with a Restraining Order. If you need to serve him, that might be a good opportunity too.

TJ, that's it. I couldn't remember his name. Dana is a Special Advocate in town. I think Sean thinks my ex-husband would have heard me saying bad things about Sean and "conspiring" against Sean. The only thing he could truthfully say (which I don't think he could say based on our marital privilege) is "Madeline was terrified of him." : \



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EXHIBIT A



cryan72@msn.com

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From : <EsqMom@aol.com>
Sent : Monday, November 28, 2005 8:59 PM
To : cryan72@msn.com
Subject : Re: Give Thanks

In a message dated 11/25/2005 5:42:32 P.M. Mountain Standard Time, cryan72@msn.com writes:

Madeline,

Thanks for getting back with me. I don't think that at this point I have anything I wish to pursue. At least you can serve him for your restraining order. I can't wait to hear how the conference goes.

Congratulations on your baby!! I can't believe you are going to be a grandma. Is this the daughter who went to court with us once? That is just amazing. Is she in the hospital or was that info from her last doctor's appointment? Either way, it can't be long now. I'll be praying for a safe delivery.

Blessings to you and your family this Thanksgiving. Hope you have a wonderful holiday.

Christy

She's not in the hospital. I expect her to be a 3 or so when we go back to the doc tomorrow. I always dilated really slowly before going to the hospital and once I got there they flew out because I was almost done! Thanks for your prayers, you are a blessing to me Christy. More than you will ever know.



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From : <EsqMom@aol.com> | | | [Inbox](#)

Sent : Monday, March 7, 2005 8:58 PM

To : cryan72@msn.com

Subject : Sean's requests

I got your message, but didn't get you on your cell. Sean, as Shelby's father, is entitled to all of the information he is requesting. The only thing I can think of for you to avoid it is to file for a restraining order in Texas. You are going to have to get him served which has been a problem for quite some time, but telling the Judge/Magistrate things like he has threatened to kill himself, how he threw the stuff in the front yard way back when and that he has asked shelby if he wants him to kidnap her are all good things along with some of the pleadings he has sent that are threatening. You can tell them you "escaped" to Texas and he has lost all parenting time but that he has somehow stalked you to TX and you fear for your life and Shelby's if all of that is true. What County are you in? I would certainly talk to a lawyer there and see about transferring the file down there. TX Judges may be a little more harsh on someone like Sean and he would have to find a new lawyer once the appeal here is through.

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Law Office of Madeline Wilson
 501 S. Cherry Street, Suite 610
 Denver, CO 80246-1328
 Fax: 303-321-3196


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From : <EsqMom@aol.com>



Sent : Friday, June 10, 2005 2:31 PM

To : cryan72@msn.com

Subject : Re: Sean is calling me

Hi,

The Order says "no parenting time" it doesn't say anything about phone calls. That tells me that the old Order regarding phone calls rules the phone call part. I cannot advise you to avoid the phone contact as he would likely file contempt against you. I would monitor her phone calls, meaning be on the other line and take notes of what he says and, if he says anything inappropriate, you might request a restraining order. You can try the Texas restraining/protective order request again if you are feeling lucky, but it sounded hard from what you told me Marilyn said. I am frankly surprised he hasn't tried to call before. The fear she expressed makes me wonder if a restraining/protective order isn't a good idea anyway. I was thinking the other day, after the Court responds to the last appeal you should really consider moving jurisdiction to Texas. Sean would have to reasearch a whole new state with different rules. Just a thought. Otherwise, he is going to keep appealing here to where we are literally frozen regarding contempts, Motions, etc. He will have to get a new attorney in TX too.

What all did he say to Shelby? Anything scary or did she just have a scary reaction? He sounded VERY manic when he called me FOUR times. Did you get his number? I have it if you need it.

In a message dated 6/10/2005 8:15:33 AM Mountain Daylight Time, cryan72@msn.com writes:

Madeline,

We had an incident last night. Sean called at our home at approximately 9:45 pm. Shelby answered and it took a few minutes for me to get to her and hang it up. This was VERY upsetting to her. She was crying and said it made her "happy and scared". She was happy to hear that he loved her because she said she wasn't sure, and scared because "I'm afraid he might try to come here and kidnap me." I couldn't get her to sleep for an hour and then she wouldn't sleep in her own room. She also said she was afraid for me because "I'm afraid this is going to make Papa mad at you, and he might try to hurt you." I gave her reassurance that she was safe and that we would find out if this is the right time to continue phone calls. ARE WE LEGALLY REQUIRED TO HAVE PHONE CONTACT? IN SPITE OF THE ADVOCATE'S REPORT RECOMMENDING NO CONTACT UNTIL HE COOPERATES WITH THE PARENTING PLAN? This was very upsetting and frightful to her and I'm not sure this is in her best interest at this time. Please advise.

Christy

>From: EsqMom@aol.com

>To: cryan72@msn.com

>Subject: Sean is calling me

>Date: Thu, 9 Jun 2005 22:40:55 EDT

>

>Sean called me and said "Put Shelby Harrington on the line for a phone call

>with her father." Let me know if he calls your place.

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From : <EsqMom@aol.com> | [Inbox](#)
 Sent : Tuesday, January 18, 2005 8:39 PM
 To : cryan72@msn.com
 Subject : Re: Give me a buzz when you can - Appeal Court Order - you won!

Attachment : [Sean_sMotionforDiscovery.pdf](#) (1.12 MB)

In a message dated 1/18/2005 12:58:49 PM Mountain Standard Time, cryan72@msn.com writes:

Madeline,

Thank you for the update. Does that mean we are finished now? Also, can you send me a signed copy of whatever the latest order is that states Sean does not get any visitation? I need a copy to give to the school and even the July 2003 order does not have a signature.

I fear with Sean we are never finished. He just sent the attached and is threatening us if we don't give your address to him. I will request that you don't have to do that, but if the Court says you have to, you have to. If you refuse, I will have to withdraw from your case.

I sent you a letter, but it was returned to me today. Our new mailing address is P.O. Box 707, Decatur, TX 76234. Telephone (940) 626-4978. You can still send to the Arvada post office box address if you must cc Sean. It is all being forwarded to me here. By the way, I was never served court papers before I left.

What address did you send it to?

I am still unemployed because Texas is processing my transfer application, but I am almost certain that I have a job lined up once I get the new license. Sorry I am behind on payments. I have \$2 in the bank until I go

EXHIBIT E

back to work.

I know Christy, but this is such an "undesireable case" that I really need you to put me as a priority creditor once you start working. I think you would agree I have been more than fair with you regarding being patient on your bill. I spend an inordinate amount of time on your case and it makes it difficult for me to just receive \$100 or \$50 some months and other months nothing. I know you understand. I have considered withdrawing from your case because of this, but you would be barraged with his never ending pleadings and, if you fail to respond to one, it could result in an order giving him parenting time or something else you wouldn't like. I am wondering if Texas would be more likely to shut Sean down than Colorado. After his latest round of appeals is over, perhaps you should find out when jurisdiction attaches there and talk to a Texas attorney and see if someone is willing to take on Sean and his never ending stream of pleadings. Let me know.

I hope you and your family had a great holiday. Contact me if you need anything else.

Thanks,
Christy



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From : <EsqMom@aol.com>
Sent : Wednesday, June 8, 2005 2:49 PM
To : cryan72@msn.com
Subject : Re: My rough draft of the document I plan to file June 6 is attached

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In a message dated 6/7/2005 4:14:31 PM Mountain Daylight Time, cryan72@msn.com writes:

Madeline,
I was finally able to open the first document. It looks fine. The police came to the door and took one look at Shelby. He looked a little disbelieving, "Is THAT her?"

fascinatng, I wonder what THAT meant. Psycho probably told them you keep her chained in the back room drooling and starving. They will get a bead on psycho because he "cries wolf" WAY too much. :)

I told him it was her and invited him in. He said it wasn't necessary and everything looked fine. I haven't heard anything else since.

Thanks again,
Christy

>From: EsqMom@aol.com
>To: cryan72@msn.com
>Subject: Re: My rough draft of the document I plan to file June 6 is
>attached

>Date: Mon, 6 Jun 2005 16:33:28 EDT

>

>

>In a message dated 6/6/2005 2:23:22 PM Mountain Daylight Time,
>cryan72@msn.com writes:

>

>Madeline,
>Thanks for the encouragement. I agree that this case has been a challenge
>physically, emotionally and spiritually. Shelby and I are doing better
>here
>in a small town where life moves at a slower pace. It has been a struggle
>for me lately as it seems all the neglected stresses of the past five
>years
>have hit at once. appreciate all the prayers you send our way. The
>police did come about ten days ago on an "anonymous tip" to do a w
>check. guess he just wanted us to know he will use every available

EXHIBIT F

>resource to "vex and harass" to put it legally.
>
>I don't know if that ANSWERBRIEF document (the first one) also needs to be
>reviewed, but it still comes up blank???? :(
>
>Let me know. The second one went through just fine.
>
>Christy
>I mean it, you know that. I will pray hard for you two and even for Sean.
>What was the outcome of the welfare check?
>
>The final one is attached.
>
>
>
>
>
>>From: EsqMom@aol.com
>>To: cryan72@msn.com
>>Subject: Re: My rough draft of the document I plan to file June 6 is
>>attached
>>Date: Mon, 6 Jun 2005 12:31:04 EDT
>>
>>
>>
>>Because Sean is CRAZY. Any more questions?
>>
>>:)
>>
>>You are welcome. Your case means a lot to me. I have learned a great
>>deal
>>during your case (mostly how to be a better person and pray for someone
>>that
>>I never thought I would pray Shelby? Is
>he
>>bothering you?
>>
>>I will try to send again.
>>
>>As for the money, I know you are good for it. Do what
>let's
>>continue to pay for each other and Sean.
>>
>>In a message dated 6/5/2005 2:55:35 PM Mountain Daylight Time,
>>cryan72@msn.com writes:
>>
>>Madeline,
>>Thank you for sending the above documents for review. However, the

>first
> >document ANSWERBRIEF001[2] comes up blank. The second came through
and
>is
> >>true and correct to the best knowledge. Why is the issue of the
> >Special Advocate's fees being argued when, according to my last
> >conversation
> >with Bill Fyfe, those fees billed specifically to Sean were written
>off?
> >Seems a moot point to me.
> >
> >Hope you are doing well. I am still unemployed but will send you what
> >money
> >I can. I appreciate all the time you have into the case.
> >
> >Christy
> >
> > >From: EsqMom@aol.com
> > >To: cryan72@msn.com
> > >CC: EsqMom@aol.com
> > >Subject: My rough draft of the document I plan to file June 6 is
> >attached
> > >Date: Sat, 4 Jun 2005 17:24:04 EDT
> > >
> > >
> > >let me know ASAP if you have any changes/deletions/additiona.
> > >
> > >Hope all is well.
> > >
> > >Happy Birthday to your TEN year old!
> > >
> > >
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>501 S. Cherry Street, Suite 610
>Denver, CO 80246-1328
>Fax: 303-321-3196
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Law Office of Madeline Wilson
501 S. Cherry Street, Suite 610
Denver, CO 80246-1328
Fax: 303-321-3196

January 4, 2005 Madeline Wilson 501 S. Cherry St., Suite 610 Denver, CO 80246 Dear Madeline, I just wanted to write and update you on things here. We are in Texas now, staying with my mom to help take care of her. My mailing address here is P.O. Box 707, Decatur, TX 76234. However, if you have to include my address on anything sent to Sean, please continue to use the post office box address in Arvada. I am having everything forwarded to me here. If anything is urgent you can e-mail at the same address or call (940) 626-4978. I have been unemployed for approximately one month and cannot work until my nursing license is endorsed by the state of Texas. Although I initiated the process back in November, everything is still pending. I am sending a reduced payment of \$10.00 and will continue to do so each month until I am employed. I am hoping to return to work imminently. The tax form you sent to me has been signed and returned. You may have received it by now. Also, I was not served any papers for court before leaving Colorado. I think that's everything. Please call me if you have questions. Sincerely, Christy Ryan
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From : <EsqMom@aol.com> | [Inbox](#)

Sent : Tuesday, April 25, 2006 2:45 PM

To : BHuff@wsteele.com, rdement@dementlaw.com

CC : cryan72@msn.com

Subject : Sean Lee Harrington

Attachment : [TX.Response.doc](#) (0.04 MB)

Hello Guys,
 As you may or may not know, Sean has grieved me in Texas. My response is attached. Christy has already approved it. I am writing to see if either of you have any objections to any of the material contained herein. Please let me know ASAP as I really need to mail this.

Thanks.
 Madeline Wilson, Esq.
 Tel. - 303-321-6872
 Fax - 303-321-3196
 Family Law, Collaborative Law,
 Child & Family Investigator (CFI)
 EsqMom@aol.com

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