

**IN THE CIRCUIT COURT OF RANDOLPH COUNTY, ARKANSAS
PROBATE DIVISION**

**IN THE MATTER OF THE GUARDIANSHIP OF
AVANI GAIA WOOD, a Minor**

NO: PR-2016-111

MOTION TO INTERVENE

COMES the Movant, Elizabeth Lanell Scott, represented by her attorneys Watson & Watson, Attorneys at Law, and for her Motion to Intervene, states:

1. That there currently exists a Petition for Guardianship before the Court filed by Deborah Hoeft, who claims to be the paternal grandmother of the minor child herein but in fact has no legal relationship with the child.
2. That Petitioner Hoeft appeared before this Court on the 8th day of August, 2016 and obtained an Ex Parte Order granting her what was referred to as “temporary and permanent guardianship” in the heading and the body of the order, but referred to only as “temporary guardianship” in the final paragraph; that Petitioner Hoeft and was granted custody of the child and has taken her back to Austin, Texas where she resides.
3. That the Movant has the right to intervene in this cause pursuant to Arkansas Rules of Civil Procedure, Rule 24(a) in that Movant also seeks guardianship of the child involved in this matter and therefor has an interest relating to the cause of action and is so situated that the disposition of the action will impair or impede her

FILED IN MY OFFICE
This 9th day of September, 2016
Rhonda L. Blewino
County & Probate Clerk
John Patton D.C.

ability to protect that interest unless she is granted the right to intervene.

4. That additionally, Movant should be permitted to intervene pursuant to ARCP 24(b) as the Petitioner's claim and the Movants claim share a question of fact.
5. That the Movant's Petition for Guardianship is joined with this Motion.

WHEREFORE, Movant pray an Order of this Court granting Movant's right to intervene in the existing action before the Court, or alternatively that Movant be permitted to intervene in the action before the Court, and that the Movant's Petition for Guardianship be incorporated herein; and for any other relief for which she may be entitled.

Movant, Elizabeth Scott

By: 


Timothy F. Watson, Jr.

ABA #2011303

**WATSON & WATSON
ATTORNEYS AT LAW
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870-523-8420**

CERTIFICATE OF SERVICE

I, Timothy F. Watson, Jr., do hereby certify that I have served a copy of the above and foregoing pleading to Ryan Wallace, Counsel for Petitioner Hoeft, by sending a copy of same by facsimile to 501-279-0223 on this the 7th day of September, 2016.


TIMOTHY F. WATSON, JR.