

**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 COMPEL DELIVERY OF THE MINOR CHILD TO ARKANSAS  
FOR THE SEPTEMBER 19, 2016 HEARING**

COMES the Movant, Elizabeth Lanell Scott, represented by her attorneys Watson & Watson, Attorneys at Law, and for her Motion to Compel Delivery of the Minor Child to Arkansas, states:

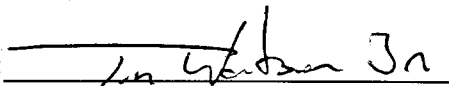
1. That a hearing on this matter is currently set for September 19, 2016 in the Lawrence County Circuit Court;
2. That at issue in that hearing is the custody of the minor child; that Petitioner Scott is praying this Court to grant her at least temporary if not permanent custody of the minor child, and has made a prima facie case through the pleadings that she has standing to intervene and pray the Court for such guardianship; that in fact the Court may decide on September 19 that Petitioner Scott is the more appropriate guardian.
3. That for that reason Petitioner Hoeft should be compelled to bring the minor child to Arkansas when she appears for the hearing on September 19.
4. That Petitioner Hoeft has denied all but minimal contact and all physical contact between the child and the child's mother, Jade Cook, who has had sole custody of

This 9<sup>th</sup> day of September, 2016  
FILED IN MY OFFICE  
*Rhonda L. Blenkins*  
County & Probate Clerk  
*Jayne Patterson*

the child for the child's entire life; that in addition to the pleadings presented by Petitioner Scott asserting that she is the appropriate guardian, the child should be allowed to have visitation with her mother.

**WHEREFORE**, Movant pray an Order of this Court compelling Petitioner Hoeft to bring Ava Gaia Wood with her when she appears on September 19, 2016 for a hearing on this matter to be held in the Lawrence County Courthouse; 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  
209 WALNUT STREET  
NEWPORT, AR 72112  
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 7<sup>th</sup> day of September, 2016.

  
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**TIMOTHY F. WATSON, JR.**