

FILED  
STATE OF MISSISSIPPI  
LAFAYETTE COUNTY

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

2020 NOV -9 PM 3:38

PHYLLIS MARIE CROWDER-KESTER

PLAINTIFF

VS.

CAUSE NO. CV2016-422(W)

MATTHEW OLIVER REARDON

DEFENDANT

**MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM**

COMES NOW Phyllis Marie Crowder-Kester, Plaintiff, by and through counsel, and files this her Motion for Appointment of Guardian Ad Litem and would show unto the Court as follows:

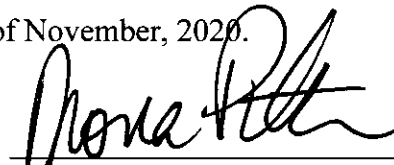
1. On May 22, 2018, This Court entered an Agreed Order for Modification regarding child visitation for the parties' minor child.
2. The Agreed Order for Modification outlined Defendant's visitation schedule with the parties' minor child. See attached Exhibit "A."
3. On September 30, 2020, Phyllis Marie Crowder-Kester, Plaintiff, filed with this Court a Petition for Modification and Other Relief stating that during periods of visitation with Matthew Oliver Reardon, Father, the minor child was not safely monitored due to the Defendant's abuse of alcohol and/or prescription or non-prescription drugs and was physically injured by the Defendant's current wife. The incident was reported to the State of Mississippi Child Protective Services and in the interim, the Plaintiff was advised to cease all visitation for the minor child with the Defendant. See attached Exhibit "B."
4. As such, the Mother feels it is in the best interest of the child that a Guardian Ad Litem be appointed for the child by this Court to protect the best interest of the minor child and report back to the Court its findings.

WHEREFORE, PREMISES CONSIDERED, Phyllis Marie Crowder-Kester, respectfully requests that this Court award the following relief:

1. An Order appointing a Guardian Ad Litem for the minor child; and
3. Any and all other general and specific relief which this Court deems proper.

Respectfully submitted, this the 6<sup>th</sup> day of November, 2020.

BY:



MONA T. PITTMAN, MS BAR NO. 9754  
COUNSEL FOR DEFENDANT  
P.O. BOX 2958  
OXFORD, MS 38655  
(662) 234-9346 TELEPHONE  
(662) 234-9748 FACSIMILIE  
[mona@panola.com](mailto:mona@panola.com)

### CERTIFICATE OF SERVICE

I, Mona T. Pittman, do hereby certify that I have this date provided a true and correct copy of the foregoing Motion to:

Matthew Oliver Reardon, Pro Se  
117 CR 401  
Oxford, MS 38655

This, the 6<sup>th</sup> day of November, 2020.

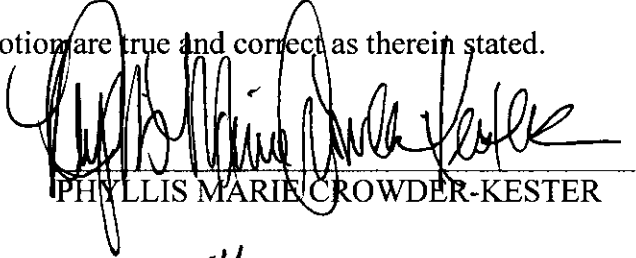


MONA T. PITTMAN

**AFFIDAVIT**

STATE OF MISSISSIPPI  
COUNTY OF LAFAYETTE

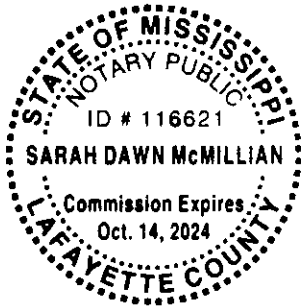
I, Phyllis Marie Crowder-Kester, do hereby swear and state, on oath, that the matters and facts as contained in the above and foregoing Motion are true and correct as therein stated.

  
PHYLLIS MARIE CROWDER-KESTER

SWORN TO AND SUBSCRIBED before me, this the 9<sup>th</sup> day of November, 2020.

  
NOTARY PUBLIC

My commission expires:



FILED  
STATE OF MISSISSIPPI  
LAFAYETTE COUNTY  
2018 MAY 22 11:14

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

MATTHEW OLIVER REARDON  
CHANCERY CLERK

PLAINTIFF

CAUSE NO.: CV2016-422W

PHYLLIS MARIE CROWDER *PA*

PLAINTIFF

**AGREED ORDER FOR MODIFICATION**

**THIS CAUSE** having come before the Court on the Motion To Modify Prior Order Of The Court and the Court having been advised that the Parties have reached an agreement in this cause and the Court finding that said agreement is in the best interest of the child of the parties and therefore the Court adopts the Agreed Order as order of the Court and therefore orders as follows:

**IT IS THEREFORE ORDERED AND ADJUDGED** that there has been a material change in circumstances in this cause and accordingly the Petitioner, Matthew Reardon, is ordered and allowed visitation with the minor child of the parties, namely, Lydia Elise Reardon, as follows:

1. Beginning January 1, 2018, Matthew Reardon shall have visitation with the said minor child every other week-end from 5:00 p.m. Friday afternoon until 5:00 p.m. Sunday afternoon at his residence in Water Valley, Mississippi.
2. The Parties, Matthew Reardon and Phyllis Crowder, mutually agree to meet at the Water Valley Police Department, or some other mutually agreed upon location outside of Lafayette County, Mississippi, for exchange of the child for visitation purposes.
  - A. Summer  
Matthew Reardon shall have visitation with the minor child for (4) four weeks during the summer to be exercised as agreed upon by Parties.



**B. Holidays**

<b><u>HOLIDAY</u></b>	<b><u>EVEN YEAR</u></b>	<b><u>ODD YEAR</u></b>
New Year's Day	Father	Mother
Easter Day	Mother	Father
Memorial Day	Father	Mother
July 4 <sup>th</sup> Day	Mother	Father
Labor Day	Father	Mother
Thanksgiving Day	Mother	Father

Father shall further have visitation on every even numbered year from December 25<sup>th</sup> at twelve o'clock (12:00) p.m. until December 31<sup>st</sup> at six o'clock (6:00) p.m.

On every even numbered year, Father shall enjoy visitation with the parties' minor child during Christmas holidays every odd numbered year from December 20<sup>th</sup> at six o'clock (6:00) p.m. until December 25<sup>th</sup> at 12:00 p.m.

For the Christmas holidays of December, 2017, the parties agree that Matthew Reardon shall have visitation as mutually agreed between the parties but no less than (4) four hours on Christmas Eve and/or (4) four hours Christmas Day and 3 other consecutive days during said holidays.

**C. Special Days**

**1. Father's Day**

That Father shall have visitation regardless of whose weekend it may fall on Father's Day from eight o'clock (8:00) a.m. until six o'clock (6:00) p.m.

**2. Mother's Day**

That Mother shall have visitation regardless of whose weekend it may fall on Mother's Day from eight o'clock (8:00) a.m. until six o'clock (6:00) p.m.

**3. Child's Birthday**

Each parent shall have one day of visitation with the minor child on or near her birthday, regardless of the visitation set out herein.

**D. Other**

Father shall have other reasonable visitation with the minor child as agreed upon by the parties.

3. That the restraining order entered by this Court on May 9, 2017, is hereby <sup>dismissed</sup> ~~cancelled~~ <sup>Revised</sup> as to Matthew Reardon and Phyllis Crowder and the above mentioned minor child of the parties.
4. All other matters and issues addressed and ordered by the Court shall remain in full force and effect.


SO ORDERED this the 22<sup>nd</sup> day of May, 2018

Arnold Watkins  
CHANCELLOR

**AGREED TO BY:**

  
MATTHEW REARDON

  
WILLIAM C. STENNETT,  
Attorney for Matthew Reardon

  
PHYLLIS CROWDER

**PRESENTED BY:**  
Stennett Law Firm  
William C. Stennett  
319 West Jefferson Street Suite A  
Post Office Box 7369  
Tupelo, Mississippi 38802  
Telephone: (662) 842-5051  
Facsimile: (662) 841-1941  
Email: [williamcstennett@gmail.com](mailto:williamcstennett@gmail.com)

FILED  
STATE OF MISSISSIPPI  
IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI  
LAFAYETTE

PHYLLIS MARIE CROWDER

2020 SEP 30 PM 12:48

PLAINTIFF

vs.

CHANCERY CLERK

CAUSE NUMBER: CV-2016-422W

MATTHEW OLIVER REARDON

RA

DEFENDANT

**PETITION FOR MODIFICATION AND OTHER RELIEF**

COMES NOW the Plaintiff, Phyllis Marie Crowder, and files this her Petition for Modification and Other Relief against the Defendant, Matthew Oliver Reardon, and in support thereof would respectfully show unto the Court the following:

1.

This Court has personal and subject matter jurisdiction in this matter.

2.

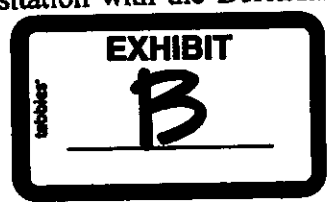
That the Defendant, Matthew Oliver Reardon, is an adult resident citizen of Lafayette County, Mississippi, and may be served with process at his residence in Lafayette County, Mississippi, or wherever he may be found.

3.

That on May 22, 2018, This Court entered an Agreed Order of Modification regarding child visitation, a true and correct copy of which is attached hereto as Exhibit "A".

4.

That there has been a material change in circumstance that has adversely affected the minor child and therefore visitation with the Defendant has ceased. The Defendant abuses alcohol and/or other prescription or non-prescription drugs to the point that he no longer safely monitors the minor child while she is in the Defendant's care which has caused physical injury to the minor child at the hands of the Defendant's current wife at which point visitation with the Defendant ceased. The incident was reported to the State of Mississippi Child Protective Services and in the interim, the Plaintiff was advised to cease all visitation with the Defendant. The Plaintiff therefore requests the



Court and for a Guardian Ad Litem to be appointed for the minor child.

5.

Additionally the Plaintiff would show that the Defendant's behavior has become erratic both on social media and in person and the Plaintiff fears for the safety of the minor child for the Defendant to be exercising the current visitation in the midst of the pandemic.

6.


Plaintiff would show that Defendant Matthew Oliver Reardon should be required to pay to the Petitioner, Phyllis Marie Crowder, a reasonable sum as attorney's fees for having to bring forth this action and that all costs of Court should be taxed to Matthew Oliver Reardon.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff Phyllis Marie Crowder respectfully requests that the Court grant unto her the following relief:

1. That the Court find that there has been a material change in circumstances which have had an adverse effect on the minor child and that visitation with the Defendant cease.
2. That Phyllis Marie Crowder be awarded reasonable attorney's fees and costs suffered in bringing this matter; and,
3. That if mistaken for the relief prayed for and entitled to, then the Plaintiff prays for such other, further, general, specific or special relief to which she may be entitled.

RESPECTFULLY SUBMITTED, this the 25<sup>th</sup> day of August, 2020.

  
\_\_\_\_\_  
PHYLLIS MARIE CROWDER

  
\_\_\_\_\_  
MONA T. PITTMAN, MSB # 9754  
Attorney for the Plaintiff  
P. O. Box 2958  
Oxford, Mississippi 38655  
Telephone: (662) 234-9346  
Facsimile: (662) 234-9748 (Facsimile)  
[mona@panola.com](mailto:mona@panola.com)



STATE OF MISSISSIPPI  
COUNTY OF LAFAYETTE

Personally appeared before me, the undersigned authority in and for the aforesaid County and State, the within named, Phyllis Marie Crowder, who, after being first duly sworn, states that the matters contained in the above and foregoing Petition for Citation of Contempt are true and correct as therein stated.

This the 25 day of August 2020.

  
\_\_\_\_\_  
Phyllis Marie Crowder

SWORN TO AND SUBSCRIBED BEFORE ME, this the 25 day of August 2020.

  
\_\_\_\_\_  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

6/15/2024

