

IN THE SUPERIOR COURT OF CHEROKEE COUNTY
STATE OF GEORGIA

[REDACTED]
v
[REDACTED]

CASE NO. 24CVE0 [REDACTED]

**MOTION TO INTERVENE AND TO VACATE FINDINGS ENTERED WITHOUT
NOTICE OR OPPORTUNITY TO BE HEARD AND OBJECTION TO CARYN
FENNELL'S REQUEST TO SEAL THE RECORD**

COMES NOW, Justin Cawthon, pursuant to O.C.G.A. §9-11-24, respectfully moves this Court for leave to intervene in the above-styled action, and as grounds therefor states the following:

1.

Justin Cawthon is a third party who was the subject of adverse findings made by this Court in its April 2, 2025 Order in which the Court stated “concerns” regarding Mr. Cawthon’s conduct as it relates to his role as a witness in this custody case. The Order was issued upon the ex-parte motion of former Guardian ad Litem Caryn Fennell. (Exhibit A: April 2, 2025 Court Order).

2.

Said Order was entered without Mr. Cawthon having been served, noticed, joined, or given any opportunity to be heard, in direct violation of due process protections under both the Georgia Constitution and the United States Constitution.

3.

The Court's Order adopts, without hearing or evidentiary scrutiny, a narrative advanced by Ms. Fennell in both her Motion for Protective Order and Motion to Withdraw that falsely portrays Mr. Cawthon as having intimidated her into withdrawing from her role, despite no evidence of such conduct, and despite the fact that Ms. Fennell herself initiated communication with Mr.

Cawthon's via e-mail for his involvement in this matter. (See Exhibit B: Guardian's Motion for protective order and Exhibit C: Guardian's Motion to Withdraw).

4.

Mr. Cawthon's involvement began only after he received a meeting request from Ms. Fennell's paralegal. He responded with a single, professional email raising serious ethical concerns about Ms. Fennell's conduct in the case. At no time did Mr. Cawthon issue threats or behave inappropriately.

5.

Mr. Cawthon is a law school graduate and former Guardian ad Litem in Florida dependency cases. He recognized that Ms. Fennell was engaging in conduct that included misrepresentations to the Court, interference with DFCS, and fixation on immaterial issues. He raised these concerns as a matter of duty and conscience.

6.

Ms. Fennell weaponized a pending frivolous misdemeanor charge against Mr. Cawthon—a nonviolent, non-dishonesty-related matter known to her well before the meeting request—to frame him as dangerous only after receiving criticism. She has since made false representations to third parties, including claims that Mr. Cawthon is in violation of bond conditions.

7.

The April 2, 2025 Order includes vague findings of "concern" that now create a public and judicial record prejudicing Mr. Cawthon in both his pending criminal matter and his efforts to re-initiate a top secret security clearance, without him having any avenue to defend himself prior to the entry of these findings.

8.

The April 2, 2025 Order was signed by the Court yet submitted through Odyssey by Ms. Fennell herself, raising serious procedural irregularities and the appearance of unlawful ex parte communication. It was signed the same day it was filed, giving the unmistakable impression of judicial rubber-stamping. It was signed less than four hours after Caryn Fennell submitted her Motion to Withdraw.

9.

The findings against Mr. Cawthon are not only factually unsupported and procedurally improper, they have real-world consequences, including reputational harm, legal prejudice, professional scrutiny and due process violations.

10.

Caryn Fennell mentioned Mr. Cawthon's name no less than ten times in her Motion to Withdraw—going to great lengths to pontificate about the pending misdemeanor, engage in theatrical outcries of “fear” without any legitimate basis. There is no reasonable argument that can be made that the Order issued by the Court in response to Ms. Fennell's Motion to Withdraw, citing concerns about the facts Ms. Fennell raises, does not pertain to Mr. Cawthon.

11.

Ms. Fennell's filings and accusations in this matter appear to be a thinly veiled attempt to get ahead of professional accountability and retaliate against lawful outcries of ethical misconduct. The Defendant in this case, Shannon Newsome, previously filed a bar complaint against Ms. Fennell based on documented misconduct. That complaint was not dismissed as Ms. Fennell has misleadingly implied; it was administratively deferred pending the final outcome of these proceedings. Her efforts to frame her critics as threats or disruptors are transparent tactics aimed at deflection from her own ethical exposure.

12.

Mr. Cawthon not only has an interest in the Motion to Set Aside, Mr. Cawthon is adamantly opposed to Ms. Fennell's efforts to seal the record that reflect negatively on her conduct in this case. Mr. Cawthon raises these objections both as someone who has been pulled into this matter and as a member of the public with a right to free access to the Court's records.

13.

Mr. Cawthon therefore seeks leave to intervene for the limited purpose of moving the Court to vacate any findings pertaining the "reasonable concerns" the Court found in the April 2, 2025 Order about the "facts and circumstances" of Ms. Fennell's allegations and to object to Ms. Fennell's Motion to Seal the filings associated with her misconduct.

14.

Furthermore, Mr. Cawthon is prepared to submit affidavits, email evidence, and additional documentation to establish the truth and context surrounding his brief interaction with Ms. Fennell and the gross distortions that followed.

15.

Mr. Cawthon tried to resolve this matter informally through writing a letter in which all parties were copied. Ironically, the Judges Office itself rejected the filing and admonished Mr. Cawthon not to attempt ex-parte communication with the court. (See Exhibit D: Letter Mr. Cawthon attempted to file and the rejection by the Judge's Office).

16.

Mr. Cawthon is a law school graduate, a veteran of the United States Army having served as a commissioned officer (Captain) for two tours in Iraq and Afghanistan as a General's Aide, has held top secret security clearances as late as 2016, holds a license in Insurance Sales issued by the Georgia Insurance Commission and has recently moved back to Georgia from Virginia with

the intent of taking the Bar as soon as the misdemeanor issue is resolved. Up until his 2024 misdemeanor arrest mentioned ad nauseum by Ms. Caryn Fennell, Mr. Cawthon does not have a criminal history whatsoever—including both arrests and convictions. Ms. Fennell's conduct is spiteful, damaging and calculated to do as much harm as possible while protecting herself.

17.

In addition to these filings Ms. Fennell is making false statements to third parties in an effort to get Mr. Cawthon's bond revoke, which further evidences her mental instability and Mr. Cawthon's need to be able to intervene in this matter to adequately redress the false accusations and his interest in keep Ms. Fennell's misconduct a matter of public record.

18.

Mr. Cawthon meets the statutory criteria under O.C.G.A. § 9-11-24 (a). Furthermore, Mr. Cawthon has no legal remedies under defamation torts in that Ms. Fennell's conduct is protected by what is commonly referred to as pleading privilege.

WHEREFORE, Mr. Cawthon respectfully prays that this Honorable Court:

- (a) Grant him leave to intervene for the limited purpose stated herein;
- (b) Vacate the findings of "concern" in its April 2, 2025 Order releasing the Guardian ad Litem;
- (c) Deny the Guardian's Motion to Seal the Record;
- (d) Grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 29th day of April 29, 2025.

/s/ Justin Cawthon, Pro Se

Justin Cawthon, Pro Se

Jcawthon12@yahoo.com

1000 Executive Lane Kennesaw Ga 30144
678-368-3495

IN THE SUPERIOR COURT OF CHEROKEE COUNTY
STATE OF GEORGIA

<div data-bbox="167 310 427 380" style="background-color: black; width: 160px; height: 33px; margin-bottom: 10px;"></div> <div data-bbox="428 386 558 420" style="text-align: right;">Plaintiff,</div> <div data-bbox="162 464 196 491" style="text-align: center;">v.</div> <div data-bbox="159 522 581 579" style="background-color: black; width: 260px; height: 27px; margin-top: 10px;"></div> <div data-bbox="444 598 610 632" style="text-align: right;">Defendant.</div>	<div data-bbox="826 422 1015 455" style="text-align: left;">CAFN: 24CVE</div> <div data-bbox="826 493 1154 527" style="text-align: left;">Assoc. CAFN: 23CVE16</div>
--	--

ORDER PERMITTING WITHDRAWAL OF GUARDIAN AD LITEM

The Court, having read and considered the Guardian Ad Litem's Motion to Withdraw and the Court having reasonable concerns about the facts and circumstances as alleged therein, the Court hereby GRANTS the Motion to Withdraw of the Guardian Ad Litem.

So ORDERED this ____ day of 4/2/2025, 2025.



HONORABLE JENNIFER L. DAVIS
JUDGE, CHEROKEE COUNTY SUPERIOR COURT

Prepared by:

/S/ CARYN S. FENNELL

Caryn S. Fennell

Georgia Bar No. 723326

Fennell, Briasco & Associates

2230 Towne Lake Parkway

Building 600-Suite 140

Woodstock, GA 30189

(770) 479-0248 (office and fax)

caryn@fbalawfirm.com

Copy Provided to: Holly Holliman, Esq; Rebecca McLaws, Esq.

**IN THE SUPERIOR COURT OF CHEROKEE COUNTY
STATE OF GEORGIA**

<div style="background-color: black; width: 100px; height: 20px; margin-bottom: 10px;"></div> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <div style="background-color: black; width: 150px; height: 20px; margin-bottom: 10px;"></div> <p style="text-align: center;">Defendant.</p>	<p>CAFN: 24CVE <div style="background-color: black; width: 50px; height: 15px; display: inline-block;"></div></p> <p>Assoc. CAFN: 23CVE1 <div style="background-color: black; width: 50px; height: 15px; display: inline-block;"></div></p> <div style="background-color: black; width: 150px; height: 15px; margin-top: 10px;"></div>
--	--

GUARDIAN AD LITEM'S MOTION FOR PROTECTIVE ORDER

COMES NOW the Guardian ad Litem, Caryn S. Fennell, Esq. (hereinafter "GAL" or "Guardian") and hereby files this Motion for Protective Order, showing this Honorable Court as follows:

1.

The Court appointed the Guardian on January 13, 2025 by oral appointment and signed an Order Appointing Guardian Ad Litem on January 15, 2025. Given the age of the case and the minor child, the Guardian immediately began working on the case and has invested over seventy billable hours in her investigation to date.

2.

On or about February 5, 2025, the Guardian learned that the mother's assertion that she was divorced from , was inaccurate as the parties remain married to this day. The marriage presented a legal emergency for the minor child for reasons previously stated in the Guardian's February 12, 2025 motion, and the Guardian requested emergency relief from the Court pursuant to same. The Court entered an Emergency Order on February 12, 2025 and scheduled a hearing on the Guardian's Motion for March 5, 2025.

3.

On March 5, 2025 and March 7, 2025, the Court proceeded with a motions hearing on several motions, including the Guardian's Emergency Motion. Having received evidence and testimony, including from the Guardian, the Court Ordered that the February 12, 2025 Order on the Emergency Motion for Custody remain in full force and effect while the entry of a Final Order is pending.

4.

Guardian shows that during the aforementioned hearing, the mother's counsel made an oral motion to have the Guardian removed/recused from this matter. Said Motion was denied by the Court and an order on same is also pending.

He

5.

After court on March 7, 2025, the Mother's counsel sent the Guardian an email (see attached Exhibit "A", page 2), whereby she asked if the Guardian had consulted with the Plaintiff/father on September 18, 2023.

6.

On Monday March 10, 2025, the Guardian responded to the Mother's Counsel's March 7, 2025 email copying both parties' counsels (see attached Exhibit "A", page 1), explaining that while the Plaintiff had contacted the Guardian's office seeking a consultation, that no such consultation occurred as both lawyers were on Leave of Absence. The Guardian also provided a copy of the internal chat board communications in the Guardian's office from the September 18, 2023 phone call (see attached Exhibit "B"). Said calls were not disclosed at the outset of the appointment as there was no consultation, no confidential information was transmitted to the Guardian's staff and in accordance with the Georgia Bar Association Office of General Counsel, and more importantly, Georgia Professional Rules of Conduct 1.7, no conflict of interest existed requiring disclosure.

7.

On March 11, 2025, mother's counsel sent a letter to the Guardian's office through the regular mail that revoked all previously signed releases of the mother for the Guardian to access mother's records (see attached Exhibit "C"). Said letter was not received late afternoon on March 14, 2025, and read on March 17, 2025 given the Guardian was out of office at a CLE on March 14, 2025. Also on March 14, 2025, the mother retracted her professional permissions for the Guardian's access to Our Family Wizard (see attached Exhibit "D").

8.

On March 17, 2025, the Guardian's Sr. Paralegal, Kelly Thornton emailed the mother seeking to schedule a meeting between the mother and the Guardian. The mother's response is attached hereto as Exhibit "E".

9.

Shortly after the mother's response, the mother's counsel directed an email at Kelly Thornton alleging that the Guardian engaged in misconduct and unethical conduct and a motion to disqualify /recuse the Guardian would be forthcoming if the court denied the mother's Motion for Habeas Corpus. (see exhibit "F", page 2).

10.

On the evening of March 17, 2025, the Guardian, responded to the mother's counsel's email in Exhibit "F" (see Exhibit "F", page 1) confirming the receipt of the letter (Exhibit C), the email (Exhibit "F", page 2) and the revocation of OFW access (Exhibit D) and requesting that both counsels

please direct all communications regarding questions of law, ethics, or procedure to the Guardian, not to the Guardian's staff as the staff not licensed or appointed to resolve such matters.

11.

In response, on March 18, 2025, the Mother's counsel sent a follow-up email accusing the Guardian (see exhibit "F", page 1) of a sundry of unethical conduct and stating that if the Guardian was doing "the right thing" she would voluntarily withdraw from the case.

12.

Thereafter, on March 20, 2025, the Guardian received the attached email (See exhibit "G") from the mother's young adult daughter, accusing the Guardian of misconduct and being "ignorant."

13.

On March 25, 2025, the Guardian received the attached email (see exhibit "H") from the mother's witness Justin Cawthon, whereby he accused the Guardian of complete disregard of the Georgia Rules of Professional Conduct, of sabotage, of depriving the mother of due process, of lying to the court, and of failing to disclose a conflict of interest. The witness said that he was "in the courtroom" for the hearing under subpoena (even though witnesses were sequestered by the mother's counsel) and that the Guardian engaged in "antics" during testimony in mother's favor. The witness further stated that he filed "multiple complaints" against the Guardian to the Georgia State Bar. The witness concluded his email stating that while he would take a meeting with the Guardian, that he will file another complaint to the State Bar if he perceives any conduct of the Guardian to be of his defined disrepute.

14.

On March 26, 2025, the Guardian received a letter from the Georgia Bar Association (dated March 17, 2025) summarily dismissing the mother's Bar Complaint against the Guardian (see Exhibit "I").

15.

The Guardian is legitimately concerned about the escalation of harassing and intimidating conduct by individuals involved in the mother's legal action. The mother and her counsel were initially cooperative, and her counsel was even complimentary in email and on phone call communications with the Guardian and her paralegal prior to the March hearing. However, once the Guardian testified during the recent motions hearing, the rhetoric, conduct and writings both to the Guardian and the Guardian's paralegal have been combative, uncooperative, accusatory. Given that this is now extending to the mother's witnesses, the Guardian has serious concerns about the harassing conduct that is being exhibited. Since the Guardian's testimony was not wholly favorable to the mother in the March hearings, and since the oral motion to remove/recuse the Guardian was

denied, there is now a concerted effort on the mother's side of the litigation to threaten, harass and bully the Guardian into voluntarily removing herself from this action.

WHEREFORE, the Guardian respectfully requests that this Honorable Court grant a protective order to the Guardian Ad Litem given the escalating conduct whereby:

- 1) All communications on behalf of the mother or for the purpose of her litigation that require the input, investigation or follow-up by the Guardian be sent by the mother's counsel to the Guardian via the United States Postal Service, or by Statutory Electronic Service.
- 2) That the mother and her counsel ensure communications from the mother, her counsel or the mother's witnesses refrain from the use of threats, whether implied or overt, to the health, safety, welfare of the Guardian, and the Guardian's staff, associates, clients, or family.
- 3) That the mother is prohibited from causing or encouraging any third party from acting contrary to communication protocol set forth herein.
- 4) That all in-person meetings for the mother's case, or any deposition, of any party or witness occur at the courthouse, where security is provided.
- 5) That the mother and her proxies are enjoined from appearing at the Guardian's office during the pendency of this litigation.

Respectfully submitted this the 26th day of MARCH, 2025.

/S/ CARYN S. FENNELL
Caryn S. Fennell
Georgia Bar No. 723326
Guardian Ad Litem

Fennell, Briasco & Associates
2230 Towne Lake Parkway
Building 600-Suite 140
Woodstock, Georgia 30189
770-479-0248 (Office and Fax)
caryn@fbalawfirm.com

Re: Ry [REDACTED]

From Caryn Fennell <caryn@fbalawfirm.com>

Date Mon 3/10/2025 11:37 AM

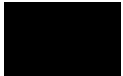
To [REDACTED] m>

Cc Holly Holliman <holly@speightslaw.com>; Caryn Fennell <caryn@fbalawfirm.com>; Kelly Thornton <kelly@fbalawfirm.com>; Gloria McConnell <gloria@speightslaw.com>; rosalyn@mclawslawgroup.com

[REDACTED]

2 attachments (355 KB)

9.18.23 - R. Hawkins.pdf; 9.18.23 - R. Hawkins.pdf;



I have copied Holly's office on this email chain so we are all on the same page.

The answer to your specific question is no. My admin researched the calls and reported her findings from our Engage board. These are the facts:

1. Mr. Hawkins called on September 18, 2023, and briefly spoke with my receptionist requesting a consultation.
2. Mr. [REDACTED] indicated he had a VA attorney he wanted someone to partner with and that he had a hearing the following week.
3. My Sr. Paralegal Kelly posted about what she reviewed from the record on ICON as to the pending pleading.
4. I was on a leave of absence with my family. Lacey was out of the office, but she responded to the post saying we could not take the consult due to timelines.
5. My staff called Mr. [REDACTED] back and left a message and they apparently exchanged missed calls until a message was delivered to Mr. Hawkins.
6. No further contact was had.

A copy of the post on our Engage board is attached.

Warm regards,

Caryn Fennell
Senior Partner



2230 Towne Lake Parkway
Building 600, Suite 140
Woodstock, GA 30189
Phone/fax: 770-479-0248

EXHIBIT A

caryn@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

Fbalawfirm.com

NOTICE: IN-OFFICE APPOINTMENTS MUST BE PRE-SCHEDULED. WE ARE UNABLE TO ACCOMMODATE WALK-IN APPOINTMENTS OR NON-SCHEDULED VISITS.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied (cc) on a response to this e-mail, then you are not an intended recipient. No attorney-client relationship shall be created without an executed fee agreement or engagement letter. If you believe you have received this message in error, notify the sender immediately and permanently delete the e-mail, any attachment, and all copies thereof and destroy any printouts.

From: [REDACTED]
Sent: Friday, March 7, 2025 4:47 PM
To: Caryn Fennell <caryn@fbalawfirm.com>
Subject: [REDACTED]

Caryn,

Did you have a consultation with Ryan Hawkins in September 2023? Phone records show 7 calls around 9 18 23.

[REDACTED]



Stefania Ayon – September 18, 2023 at 10:08 AM

Follow in Inbox

Lacey Briasco Kelly Thornton Paige Durham

CONSULT: GOOGLE: 09.18, 09:59 AM

Ryan Hawkins

Cherokee, Emergency Motion to Return Child - Hearing 09.26. Info I did not ask for: Ryan is looking for a Co-Counsel. He apparently has full custody of child granted to him in VA. Mom moved down to GA and filed this. His current VA counsel is going to come down but looking for a co-counsel in state for hearing?

770-355-1221

rhawkins5594@gmail.com

Tasked PD. PD/KT & LMB all unavailable at time of call.

All information is in GROW and exported to Clio with notes attached.

cc: Lacey Briasco, Kelly Thornton, and Paige Durham

LIKE REPLY SHARE ...

Seen by 7



Paige Durham – September 18, 2023 at 10:15 AM

Lacey Briasco - Is this something we can assist with??

cc: Lacey Briasco

LIKE REPLY SHARE ...



Kelly Thornton – September 18, 2023 at 10:22 AM – Edited

I looked this up quickly in ICON just to see what had been filed and given this emergency hearing. According to mom's Cherokee Co. pleadings, Ryan never legitimated and never declared paternity, yet managed to get custody of the 4 year old kid in VA because mom was having a medical procedure and didn't show up for Court (which mom alleges she believed the hearing was continued).

(which mom alleges she believed the hearing was continued).

It's a Petition for Habeas Corpus and to Return Child.

LIKE REPLY SHARE ...



Lacey Briasco – September 18, 2023 at 10:37 AM

We cannot represent someone for a hearing that is next Tuesday. Caryn and I are both out most of this week and would not be able to prepare for a hearing.

LIKE REPLY SHARE ...



Paige Durham in reply to **Lacey Briasco** – September 18, 2023 at 11:25 AM

Lacey Briasco In the future though, would we be able to assist with something like this?? :) Wanting to know just in case this comes up again

cc: Lacey Briasco

LIKE REPLY SHARE ...



Lacey Briasco – September 18, 2023 at 11:26 AM

Potentially. I would need to know more and would likely want to speak with the atty.

LIKE REPLY SHARE ...

Paige Durham reacted to this



Paige Durham – September 18, 2023 at 02:32 PM

09.18, 2:31 pm. I called Ryan back, he did not answer. I left a voicemail. 770-355-1221

LIKE REPLY SHARE ...

EXHIBIT B

M

Group | LLC

March 11, 2025

VIA ELECTRONIC MAIL
AND VIA REGULAR MAIL

Caryn Fennell, Esq.
Fennell Briasco & Associates
Building 600
2230 Towne Lake Park, Suite 140
Woodstock, Georgia 30189

RE:

In the Superior Court of Cherokee County
Civil Action File No.: 24C

Dear Caryn,

This correspondence is intended to serve as my client's revocation for any release(s) she previously executed allowing you to obtain information about her. This specifically revokes prior HIPPA authorizations relating to my client's mental health records, any information relating to Veteran's Court, or any other release about my client.

Sincerely,

RWM/
Cc:

EXHIBIT C

3745 Cherokee Street, Suite 205 | Kennesaw | Georgia | 30144
770.406.6624 | rebecca@mclawslawgroup.com

Fw: OFW Access Removed

From Kelly Thornton <kelly@fbalawfirm.com>

Date Wed 3/26/2025 2:46 PM

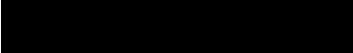
To Kelly Thornton <kelly@fbalawfirm.com>

From: info@ourfamilywizard.com <info@ourfamilywizard.com>

Sent: Friday, March 14, 2025 9:58:05 PM

To: Caryn Fennell <caryn@fbalawfirm.com>

Subject: OFW Access Removed

 has removed your access to their
OurFamilyWizard activity. Please contact us if you have any questions.

Cordially,

The OurFamilyWizard Team

info@ourfamilywizard.com

Fax: (952) 548-8159

Help Line: US (866) 755-9991 / AUS 1800 823 469 / NZ 0800 453 751 / UK 02035140008

[OurFamilyWizard](#)

This communication contains privileged and confidential information and is intended only for the use of the above-named recipient. You, the intended or unintended recipient, are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited without expressed consent of its sender. If you have received this communication in error, please notify sender and destroy this message immediately.

EXHIBIT D

Re: HAWKINS/NEWSOME - Meeting Scheduling

From [REDACTED]
Date Mon 3/17/2025 12:11 PM
To Kelly Thornton <kelly@fbalawfirm.com>; [REDACTED]
Cc Caryn Fennell <caryn@fbalawfirm.com>

Please do not communicate anything with me from this office without copying my attorney on the matter. I will ask her how this will be handled.

On 2025-03-17 11:07, Kelly Thornton wrote:

[REDACTED]

Caryn asked me to reach out to you to set up a meeting. The meeting can either be held via Microsoft Teams or can be in-person. Please let us know which you would prefer and then I can provide you with dates/times depending upon what you select.

Warm regards,

Kelly R. Thornton

Senior Paralegal

They/Them



2230 Towne Lake Parkway
Building 600, Suite 140
Woodstock, GA 30189

Phone/fax: 770-479-0248

kelly@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

fbalawfirm.com

NOTICE: In-office appointments must be pre-scheduled. We are unable to accommodate walk-in appointments or non-scheduled visits.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied

EXHIBIT E

Re: [REDACTED] E - Meeting Scheduling

From [REDACTED]

Date Tue 3/18/2025 6:40 AM

To Caryn Fennell <caryn@fbalawfirm.com>

Cc Kelly Thornton <kelly@fbalawfirm.com>; [REDACTED]; Holly Holliman <holly@speightslaw.com>; Gloria McConnell <gloria@speightslaw.com>; [REDACTED]

Caryn,

You have a conflict of interest that was only disclosed when we asked about it. The conflict, coupled with your interference with the DFCS investigation, and your baseless accusations against me in open court that were solely intended to inflame the Court and bolster your position as Mr. [REDACTED] advocate and attorney, raises serious concerns about your impartiality. As I indicated before, my client and I will not interact with you until the Court rules on the pending Motions. If denied, then I will be moving to remove you from this case.

You should voluntarily withdraw given the conflict of interest that you failed to disclose at the beginning of your appointment. But, I don't expect you to do the right thing without further involvement by the Court.

On 2025-03-17 22:05, Caryn Fennell wrote:

[REDACTED]

I am in receipt of your email below. I am copying both counsels on this response so we are all on the same page.

I understand per your email below, coupled with your client's retraction of my OFW access and your letter dated March 11, 2025, received in my office on March 14, 2025 and proceeded today given my out of office status Friday at a CLE, that your client is no longer cooperating in the Guardian investigation or complying with the court's Guardian Order. I assume this retraction of cooperation by your client applies to your client's witnesses, but if I am incorrect, then please let me know.

Given your below email and recent letter, then I expect to be ready to issue recommendations soon and given same, this case can proceed immediately to mediation and then a final trial should mediation not be successful.

I ask both counsels to remember that my staff are working at my direction. Thus, they will not respond to emails as the one below when such an email with the content therein is directed at them. They are simply trying to do their job, and emails should not be directed at them that require confirmation of legal, ethical or other considerations as they are not licensed attorneys or authorized by court order to address same. If you

EXHIBIT F

have such a need to address these matters, then please address me directly and I will be more than happy to respond accordingly.

I hope everyone has a good evening.

Warm regards,

Caryn Fennell

Senior Partner



2230 Towne Lake Parkway

Building 600, Suite 140

Woodstock, GA 30189

Phone/fax: 770-479-0248

caryn@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

Fbalawfirm.com

NOTICE: IN-OFFICE APPOINTMENTS MUST BE PRE-SCHEDULED. WE ARE UNABLE TO ACCOMMODATE WALK-IN APPOINTMENTS OR NON-SCHEDULED VISITS.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied (cc) on a response to this e-mail, then you are not an intended recipient. No attorney-client relationship shall be created without an executed fee agreement or engagement letter. If you believe you have received this message in error, notify the sender immediately and permanently delete the e-mail, any attachment, and all copies thereof and destroy any printouts.

From: rebecca@mclawslawgroup.com <rebecca@mclawslawgroup.com>

Sent: Monday, March 17, 2025 12:31 PM

To: [REDACTED]

Cc: Kelly Thornton <kelly@fbalawfirm.com>; Rosalyn Evans <rosalyn@mclawslawgroup.com>; Caryn Fennell <caryn@fbalawfirm.com>

Subject: Re: H [REDACTED] g

Kelly,

My client will not be meeting with Caryn until there is a ruling on the Habeas Petition and Emergency Motion. If Judge Davis denies the return of the child to my client immediately, I will be filing Motions that will need to be addressed, including, but not limited to, a Motion relating to Ms. Fennell's unethical conduct in this case. Until there is resolution of those Motions, my client and I will not be meeting with or communicating with Ms. Fennell except as necessary and required by the law.

Please confirm receipt.



On 2025-03-17 12:10, shannon@mclawslawgroup.com wrote:

Please do not communicate anything with me from this office without copying my attorney on the matter. I will ask her how this will be handled.

On 2025-03-17 11:07, Kelly Thornton wrote:

S [REDACTED]

Caryn asked me to reach out to you to set up a meeting. The meeting can either be held via Microsoft Teams or can be in-person. Please let us know which you would prefer and then I can provide you with dates/times depending upon what you select.

Warm regards,

Kelly R. Thornton

Senior Paralegal

They/Them



2230 Towne Lake Parkway
Building 600, Suite 140
Woodstock, GA 30189
Phone/fax: 770-479-0248

kelly@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

Fbalawfirm.com

NOTICE: In-office appointments must be pre-scheduled. We are unable to accommodate walk-in appointments or non-scheduled visits.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied (cc) on a response to this e-mail, then you are not an intended recipient. No attorney-client relationship shall be created without an executed fee agreement or engagement letter. If you believe you have received this message in error, notify the sender immediately and permanently delete the e-mail, any attachment, and all copies thereof and destroy any printouts.

B [REDACTED] s Custody

From Isa [REDACTED] a <isa[REDACTED]03@gmail.com>

Date Thu 3/20/2025 3:55 PM

To Caryn Fennell <caryn@fbalawfirm.com>; Kelly Thornton <kelly@fbalawfirm.com>

Do you intend to set up an interview with me? But before we get to far into that, let me address something else that has been bothering me since the March 7 hearing.

Do you intend to retract your misrepresentation to the court that I was part of my mother's home purchase? The fact that she put my name on the deed to avoid probate in the event of her death does not mean that I was part of the purchase, or that I bought it with her, or that I signed any document, assumed any responsibility, entered any contract, or underwent any kind of financial and credit check in the home purchase process.

It was clear when I heard you say this in court that the statement was made with the specific intent of undermining my mother's progress, and I think its clear that I did not buy the home with her or bolster her ability to make the purchase in any way.

I am not looking for you to gaslight me that you are somehow ignorant as to the legal distinctions regarding my involvement in this matter, but prior to having any meaningful conversation I would like some assurances that you will do the right thing with the Court as it pertains to how my name and role in my mother's home purchase was represented, or misrepresented in this case moving forward.

If her purchase of a home isnt a big deal and I am just being too OCD on a minor detail, then correcting your misrepresentations before the tribunal shouldnt be a big deal, either.

EXHIBIT G

Re: H [REDACTED] E - Witness Meeting

From Justin Cawthon <jcawthon12@yahoo.com>

Date Tue 3/25/2025 12:25 PM

To Kelly Thornton <kelly@fbalawfirm.com>

Cc Caryn Fennell <caryn@fbalawfirm.com>

I do remember completing that questionnaire around the end of last year sometime. However, I completed this form in belief that I was aiding an attorney in their capacity as a good faith guardian ad litem. However, the behavior I have witnessed from Caryn and her complete disregard for the Georgia Professional rules of conduct over the past few months, has made me change my mind.

Please understand I will not participate in anyone's personal efforts to sabotage my friend [REDACTED]'s case, deprive her of due process (by lying in court and failing to disclose conflict of interests) and most importantly, potentially sabotaging something as sacred as a mother and daughter bond that S [REDACTED] shares with her biological daughter.

I will take any one of those times you listed, but please know, that I have filed multiple complaints about Caryn to the ethics commission of the Georgia State Bar Association, with the following complaints;

violation of Rule 3.3 (Candor to the tribunal) "a lawyer shall not knowingly make a false statement of fact of law to the tribunal (court). On S [REDACTED]'s last hearing, Caryn, acting in her capacity as guardian ad litem, made a declaration to the court that Shannon's Vet Court appointed therapist had advised that "S [REDACTED] was not ready for unsupervised visits". I know for a fact that S [REDACTED]'s therapist NEVER made any such statement, as S [REDACTED]'s therapist actually testified under oath, "as a therapist, I cannot nor would not make such a recommendation, and I informed the guardian Ad Litem that in fact, S [REDACTED] was improving very well"

I have the transcripts of these and will be submitting them as addendums to my complaint.

My second complaint against Caryn Fennel will be for violating Rule Rule 1.7 of the Georgia Professional Rules of Conduct, which prohibits conflict of interest.

I have been following both S [REDACTED]'s domestic dispute with the Hawkins family, as well as her criminal case that was remanded to Cherokee County Vet Court, as I have found myself

EXHIBIT H

dragged into both of them.

As part of the defense discovery, we were granted access to all of Ryan Hawkins' phone records. On these records, there were numerous calls made between Hawkins and your office, which means Hawkins had in fact contacted and consulted with your office.

Conflict of interest rules, in pretty much EVERY state, expressly states that even in a one time consultation, that counts as 'former representation' and in such a circumstance, Caryn Fennel could not adequately represent the dependent child, as she had previously represented (according the Georgia Rules of Professional conduct) Ryan Hawkins in this VERY MATTER.

Not only did she fail to disclose that to the court, but her continued capacity as guardian ad litem has blatantly displayed her favorable treatment of Ryan Hawkins while continuing to knee cap S [REDACTED] at every opportunity.

Again, I have been present in the court rooms to personally witness some of her antics (I was present legally, I was under subpoena) These antics include heavy sighing and dramatic gestures anytime ANY witness were to say anything positive in S [REDACTED]'s favor. On another occasion, S [REDACTED]'s therapist alluded to her progress. Caryn blurted out (not being asked) "Well, you cant go anywhere but up, when you were AT THE BOTTOM!" My god! really? I mean can she be more obvious about her conflict of interest in this case!!!???

Additionally, while Caryn seems to have very little interest in R [REDACTED]'s extreme drinking around N [REDACTED], taking to her bars (the child asked her mother on one of these 'supervised visits' if S [REDACTED] could 'meet her at Taco Mac"! lovely! she is fucking five years old!) and actually DRIVING DRUNK with Na [REDACTED] [REDACTED] not properly strapped in and being ejected from her seat! Some of this was caught on video and multiple third parties have testified to this effect under oath. I mean this is a CHILD's SAFETY for Christ sake!

Instead, this guardian ad litem, and at this point, I use this term comically and liberally, is more concerned with the following (a) Civil actions against Shannon from OVER TEN YEARS prior as a result of S [REDACTED] disbarment (b) [REDACTED]'s contact with me (the case against me is being dropped and thus the no contact order will be vitiated) Caryn went even so far as to say she has "concerns about S [REDACTED] following court orders" well (i) this has ZERO relevance as to parental fitness and

(ii) if S [REDACTED] WAS in violation of her Vet Court orders, then she would be in jail, right? Unless Caryn is implying that Judge Morris is a softie.

I do apologize for being long winded, but you see my concern right?

Im not really dealing with an appointed guardian ad litem whose main concern is whats best for the child, but rather a second attorney for Ha [REDACTED], (after all he consulted her and she failed to disclose this to the court) and her special interest in this case is beyond obvious. Lackadaisical

attitude toward Hawkins drunk driving with Natalie in the car, but super concerned about the details of S [REDACTED] probation that bares no relevance in THIS matter.

So I will agree to meet with Caryn at any of the times you listed work for me. But please be advised that if ANY statement I make gets twisted or misrepresented or Caryn issues a lie claiming I said something I did not. I will issue another complaint to the state bar.

Sincerely

Justin Cawthon

678 368 3495

on,

Attorney Fennell is out of the office today, but she requested I reach out to you regarding the witness questionnaire that you completed on behalf of S [REDACTED]

As a Guardian Ad Litem, Attorney Fennell conducts her investigation in phases. She has had this case for approximately 2 months and has collected evidence as part of the initial phase, including the witness questionnaires and affidavits. Once she has had the case for 8-10 weeks, that is usually when she moves into the second phase and begins scheduling witness interviews, so we have just hit that timing point.

She would like to schedule a call with you to discuss your questionnaire and any other information you may be able to provide. Unfortunately, she has limited time between now and when she will be out of the country for 2 weeks in early April. So here is what she has available:

1. Thursday, March 27th at 12:00 pm, 12:30 pm, or 1:00 pm.
2. Tuesday, April 15th at 11:00 am; or,
3. Monday, April 21st at 10:00 am; 10:30 am; or 11:00 am.

Please note that we expect the call to last around 1 hour - so the 30-minute incremental start times are not meant to indicate a shorter meeting. However, she is having me reach out to several witnesses, so I cannot guarantee a time slot if someone requests it first.

Please let us know if any of these dates and times work for you. If they do not, I can provide additional times in late April.

Warm regards,

Kelly R. Thornton

Senior Paralegal

They/Them



2230 Towne Lake Parkway

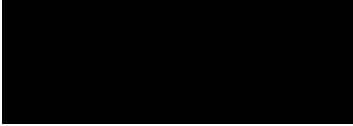


State Bar of Georgia

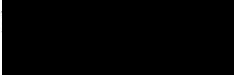
Office of the General Counsel

March 17, 2025

CONFIDENTIAL



Re: Grievance filed against Ms. Caryn Suzanne Fennell, Bar #723326

Dear Ms. 

Thank you for submitting your grievance to the Office of the General Counsel of the State Bar of Georgia. We carefully reviewed the grievance you filed against attorney Caryn Suzanne Fennell with our office. You allege Ms. Fennell exhibited misconduct while acting as the Guardian ad Litem in a civil matter because, among other things, she failed to disclose a potential conflict of interest, disclosed private information about the case to third parties, purposefully misrepresented recommendations made to her, and interfered with the DFCS investigation.

Please be advised that this office has dismissed your grievance. Your grievance was dismissed because the legal issues described in the narrative of your grievance are a part of an open, ongoing matter. The current litigation needs to be concluded before the State Bar of Georgia can consider the grievance against the attorney. Only after a court has ruled can it be determined if a violation of the Georgia Rules of Professional Conduct has occurred. Dismissal of your original grievance by our office does not affect your right to file a new grievance once the pending action has concluded to determine if a violation of the ethics rules has occurred. While it cannot be guaranteed that any new grievance will result in a recommendation to the State Disciplinary Board, the file and all new supporting documentation will be carefully and thoroughly reviewed.

Sincerely Yours,



Jakarah Everett
Assistant General Counsel
JE/tj

cc: Ms. Caryn Suzanne Fennell

RUSSELL D. WILLARD
General Counsel

LORI ANDERSON
MERCEDES G. BALL
LEIGH BURGESS
WILLIAM V. HEARNBURG, JR.
JAMES S. LEWIS
ANDREEA N. MORRISON
ADRIENNE D. NASH
WILLIAM D. NESMITH, III
JOHN J. SHIPTENKO

EXHIBIT I

Rosalyn Evans

From: Kelly Thornton <kelly@fbalawfirm.com>
Sent: Wednesday, April 2, 2025 8:48 AM
To: Olivia Rowland
Cc: Caryn Fennell; Holly Holliman; Gloria McConnell; [REDACTED]
Subject: [REDACTED]
Attachments: (FS) GAL Motion to Withdraw.pdf

Ms. Rowland,

Pursuant to USCR 6.1, please find attached a courtesy copy of the file-stamped Guardian Ad Litem's Motion to Withdraw that was filed this morning. A proposed Order as to same has also been submitted through Odyssey for the Court's consideration.

Please let us know if you need anything additional. All counsels are CC'd hereon.

Warm regards,

Kelly R. Thornton

Senior Paralegal

They/Them



2230 Towne Lake Parkway

Building 600, Suite 140

Woodstock, GA 30189

Phone/fax: 770-479-0248

kelly@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

Fbalawfirm.com

NOTICE: In-office appointments must be pre-scheduled. We are unable to accommodate walk-in appointments or non-scheduled visits.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied (cc) on a response to this e-mail, then you are not an intended recipient. No attorney-client relationship shall be created without an executed fee agreement or engagement letter. If you believe you have received this message in error, notify the sender immediately and permanently delete the e-mail, any attachment, and all copies thereof and destroy any printouts.

4/2/2025 8:29 AM PG
Patty Baker, Clerk
Civil Division

IN THE SUPERIOR COURT OF CHEROKEE COUNTY
STATE OF GEORGIA

<div data-bbox="191 321 448 394" style="background-color: black; width: 158px; height: 35px;"></div> <div data-bbox="443 403 566 436" style="text-align: center;">Plaintiff,</div> <div data-bbox="199 485 227 510" style="text-align: center;">v.</div> <div data-bbox="191 533 644 585" style="background-color: black; width: 279px; height: 25px;"></div> <div data-bbox="472 615 626 646" style="text-align: center;">Defendant.</div>	<div data-bbox="839 434 985 466" style="text-align: center;">CAFN: 240</div> <div data-bbox="839 504 1034 537" style="text-align: center;">Assoc. CAFN: 2</div> <div data-bbox="998 541 1034 573" style="text-align: center;">(N</div>
---	--

GUARDIAN AD LITEM'S MOTION TO WITHDRAW

COMES NOW the Guardian ad Litem, Caryn S. Fennell, Esq. (hereinafter "GAL" or "Guardian") and hereby files her Motion to Withdraw as the appointed Guardian ad Litem, showing this Honorable Court as follows:

I. GENERAL INTRODUCTION

The Court appointed the Guardian on January 13, 2025, by oral appointment and signed an Order Appointing Guardian Ad Litem on January 15, 2025. Given the age of the case, the age of the young minor child, the seriousness of the issues and allegations, and that the minor child has spent over sixty percent of her life in litigation¹, the Guardian immediately began working and investigating. In the nine weeks since her appointment, the Guardian was on Leave of Absence for two weeks but conducted over seventy billable investigative hours in the remaining seven weeks. It was always the Guardian's intention to complete her investigation and issue recommendations in May 2025 to assist the parties in reaching resolution in the matter, which is most important for this minor child's extraction from the throws of constant litigation.

Unfortunately, for the reasons set forth herein, the Guardian will not complete her investigation. It will not be completed because the mother, mother's counsel, Rebecca McLaws, and the mother's witnesses have been engaging in a campaign of harassment and intimidation that has placed the Guardian, as well as the Guardian's staff, Law Partner, and family in genuine fear for their safety. The corrosive effect of the conduct of those involved in the mother's litigation is underpinned

¹ Referencing the Mother's December 2020 Child Support Services action, the Mother's January 2021 Cherokee County Child Support action dismissed in August 2021, the Father's December 2022 Custody action in Fairfax Virginia, and the Mother's September 2023 Habeas Corpus Petition, consolidated into the pending litigation.

by the Guardian's knowledge of the mother's previous acts, and criminal history, and at least one of the mother's witnesses' criminal charges. Said criminal history includes death threats against others involved in this case, and threats of sexual harm against the Assistant District Attorney responsible for prosecuting the mother for Aggravated Stalking charges associated with the pending litigation². The Guardian notes that in the many cases where she has served as Guardian, and the hundreds of civil domestic and criminal cases where she served as litigator, there has **never** been an instance where the threats, harassment and intimidation tactics (as outlined herein) were imposed upon this Guardian such as by the mother, the mother's counsel, and the mother's witnesses in this matter.

In an interim effort to obtain a lesser impactful judicial remedy than withdrawal, the Guardian filed a Motion for Protective Order on March 26, 2025. Since filing same, this Guardian determined that the threats and conduct caused; 1) a genuine fear for the Guardian's safety and the safety her staff and family; and, 2) an inability for the Guardian set aside the recent conduct and not have it interfere with her job as the Guardian in this matter.

II. SPECIFIC CONDUCT AND ISSUES

While the mother and the mother's counsel began the Guardian's investigative process abundantly cooperative, and the mother's counsel was frequently complimentary to the Guardian, their individual and collective conduct took a sudden and hostile turn when the Guardian's testimony in the case on March 7, 2025 was less than favorable to the Mother.

The Guardian shows that during the hearing on March 7, 2025³, the mother's counsel made an oral motion to have the Guardian removed/recused from this matter. Mother's counsel alleged that the Guardian "interfered" with a Department of Family and Children's Services Investigation at the father's home on March 6, 2025 (the day between the two hearing dates) by going to the home where the child resided when DFCS was present on said day. The mother's counsel accused the Guardian of acting unethically as a "second attorney" for the father and further alleged that the Guardian's presence was unprecedented. Said Motion was **DENIED** by the Court and an order on same is pending.

² Mother is subject to a Temporary Protective Order issued in 2023 for numerous written death threats against the father and his family and other threatening conduct. The mother's conduct and contact continued in violation of the TPO, whereby and she was arrested and indicted on three counts of Aggravated Stalking and sentenced in April 2024. Justin Cawthon was arrested and accused of Terroristic Threats for threats of sexual harm against the Cherokee County Assistant District Attorney responsible for prosecuting the mother for the Aggravated Stalking case.

³ Which was a continuation of the hearing that began on March 5, 2025.

After court on March 7, 2025, the mother's counsel sent the Guardian an email (see attached Exhibit "A", page 2), whereby she asked if the Guardian had consulted with the Plaintiff father on September 18, 2023. On Monday March 10, 2025, the Guardian responded to the mother's counsel's March 7, 2025 email copying both parties' counsels (see attached Exhibit "A", page 1). The Guardian explained that while the Plaintiff had contacted the Guardian's office seeking a consultation on September 18, 2023⁴, that no such consultation occurred as both lawyers were out of the office for the week. Specifically, the Guardian was on Leave of Absence with her family. The Guardian also provided a copy of the internal chat board communications in the Guardian's office from the September 18, 2023, phone call (see attached Exhibit "B"). Said calls were not disclosed at the outset of the appointment as they were not identified by the Guardian during the conflict check process given no consultation occurred and pursuant to the Georgia Professional Rules of Conduct ("GRPC") 1.7, no conflict of interest exists. While this Guardian's understanding of GRPC 1.7 is absolute, she nonetheless contacted the State Bar of Georgia, Office of the General Counsel to confirm the wrongness of mother's counsel's claims of "conflict of interest," whereby said wrongness was in fact, confirmed⁵.

On March 14, 2025, the Guardian's process a letter from the mother's counsel revoking all previously signed releases of the mother for the Guardian to access mother's records (see attached Exhibit "C"). Said letter was first reviewed by the Guardian on March 17, 2025. Also on March 14, 2025, the mother retracted her professional permissions for the Guardian's access to Our Family Wizard (see attached Exhibit "D"). Furthermore, on March 17, 2025, the Guardian's Sr. Paralegal, Kelly Thornton emailed the mother to schedule a meeting between the mother and the Guardian. Shortly after receiving the mother's terse response (see Exhibit "E"), the mother's counsel directed an email at Kelly Thornton stating that if the Judge did not rule in her client's favor and *"return the child to my client immediately, I will be filing motions that I need to be addressed, including, but not limited to, a Motion relating to Ms. Fennell's unethical conduct in this case."* (see exhibit "F", page 2).

On the evening of March 17, 2025, the Guardian, responded to the mother's counsel's email in Exhibit "F" (see Exhibit "F", page 1) and confirmed receipt of the March 11, 2025 letter (Exhibit "C"), the mother's counsel's March 10, 2025 email to Paralegal Thornton, (Exhibit "F", page 2) and the

⁴ The contact was eighteen months before the Guardian's appointment.

⁵ After multiple accusations and continued harassment by the mother's counsel regarding the alleged "conflict of interest" the Guardian contacted the Georgia State Bar Association's Office of General Counsel regarding the matter to confirm what the Guardian already understood as the plain meaning of GRPC 1.7. Staff Counsel reinforced the Guardian's understanding that no conflict occurred because no consultation occurred.

mother's revocation of OFW access (Exhibit "D"). The Guardian addressed the Mother's revocation of cooperation in the Guardian's investigation and the unwillingness to comply with the Court's Guardian ad Litem Order. Further, the Guardian specifically requested that the lawyers refrain from directing communications about law, ethics, or procedures to the Guardian's staff as they do not hold authority by state licensure or court appointment to discuss or resolve such matters with the lawyers.

On March 18, 2025, the mother's counsel sent a follow-up email (see exhibit "F", page 1) accusing the Guardian of a sundry of unethical conduct and concluding that if the Guardian was doing "the right thing" then she would voluntarily withdraw from the case. The relevant part of the email is as follows:

The conflict, coupled with your interference with the DFCS investigation, and your baseless accusations against me in open court that were solely intended to inflame the Court and bolster your position as Mr. Hawkins' advocate and attorney, raises serious concerns about your impartiality. As I indicated before, my client and I will not interact with you until the Court rules on the pending Motions. If denied, then I will be moving to remove you from this case.

You should voluntarily withdraw given the conflict of interest that you failed to disclose at the beginning of your appointment. But I don't expect you to do the right thing without further involvement by the Court.

The mother's counsel's allegations and threats about the alleged conflict of interest and the DFCS investigation have continued even though:

- 1) her March 7, 2025 oral Motion to Recuse the Guardian for alleged "interference" with the DFCS investigation was **DENIED**, and
- 2) on March 10, 2025, the Guardian provided detailed information (Exhibit "A", page 1), regarding the father's contact with the Guardian's office proving no conflict resulted.

Thereafter, on March 20, 2025, the Guardian received the attached unsolicited email (See Exhibit "G") from the mother's young adult daughter, Isabel Rivera, accusing the Guardian of misconduct and of being "ignorant." Ms. Rivera's focus was on the Guardian's statements at the hearing that the mother purchased a new home in Waleska with Ms. Rivera, when Ms. Rivera states she is only on the deed, not the security interest. Ms. Rivera demanded the Guardian make a correction to the "tribunal" of the misrepresentation and demanded that the Guardian not "gaslight"⁶

⁶ Merriam Webster's Dictionary defines the term "gaslight" in this manner as an action involving psychological manipulation of a person usually over an extended period of time that causes the victim to question the validity of their own thoughts, perception of reality, or memories and typically leads to confusion, loss of confidence and self-esteem, uncertainty of one's emotional or mental stability, and a dependency on the perpetrator.

her and further demanded that the Guardian “do the right thing” and fix the misrepresentation. Ms. Rivera was offended in her perception that the Guardian intended to undermine her mother, when in fact, the purpose of the status update to the Court was to show the Mother’s housing was stable.

On March 25, 2025, the Guardian received the attached email (see Exhibit “H”) from the mother’s witness Justin Cawthon in response to an inquiry from the Guardian’s Sr. Paralegal, Kelly Thornton seeking to schedule a meeting with the witness. Instead of sending a reasonable response, or none at all, Mr. Cawthon, a former law student, who is currently under accusation in Cherokee County, Georgia for Terroristic Threats against the District Attorney who prosecuted the mother for Aggravated Stalking, sent the attached tirade whereby:

- a. Mr. Cawthon stated that he filed “multiple complaints” against the Guardian to the Georgia State Bar and that he will file additional complaints as needed.
- b. Mr. Cawthon accused the Guardian of engaging in a complete disregard her ethics, of sabotaging the mother and daughter bond, of “knee cap[ping]” the mother, of depriving the mother of due process, of lying to the court, and a conflict of interest.
- c. Mr. Cawthon accused the Guardian of being “lackadaisical,” ignoring negative evidence about the father, and making false statements.
- d. Mr. Cawthon stated he was “in the courtroom” under subpoena for the hearing (though the rule of sequestration was imposed by the mother’s counsel) and that he witnessed the Guardian engage in “antics” during testimony.
- e. Mr. Cawthon said he would meet with the Guardian but would file another complaint to the State Bar if he perceived any conduct to be of his defined disrepute.

The following day, Mr. Cawthon sent an email to Sr. Paralegal, Kelly Thornton asking: “*Did we figure put a time yet????*” [sic].

On March 26, 2025, the Guardian received a letter from the State Bar of Georgia (dated March 17, 2025) summarily dismissing the mother’s Bar Complaint against the Guardian (see Exhibit “I”).

III. EXTRAORDINARY CIRCUMSTANCES

This Guardian notes for this Court that the mother and her accomplices cloak their conduct in a faulty premise whereby they feel justified in foisting unethical and harmful threats and harassment upon this Guardian because they decided the Guardian is unethical. The “unethical” diversion, while contrived, is a coercive tactic designed to bend the Guardian, and indirectly this Court, to their will. It is a distraction from the real reason the mother is not achieving favorable

custody outcomes. This behavior undermines the integrity of the judicial system, the Guardian's appointment, and the Guardian's investigation. Notwithstanding same, even if there was unethical conduct by this Guardian, which there was not, harassment is not the proper manner or means to handle same when a Presiding Judge is sitting in jurisdiction over the pending matter.

The minor child in the pending litigation deserves better. Children in all litigation cases deserve better. It should never be that disgruntled lawyers, parents, litigants, witnesses or others be allowed to harass and intimidate the Court, or Officers of the Court, into bending to their will. This version of self-help by lawyers, litigants and witnesses, is unacceptable. **NO GUARDIAN** should **EVER** be subject to a circumference of harassment and bullying by a party, counsel or witnesses. Litigants and lawyers using harassment and coercion to extract outcomes they otherwise are unable to successfully obtain on the merits is a red line that should never be crossed, yet it has been crossed here. The behavior is dangerous and has invoked legitimate and actual fear in the Guardian's staff, her Law Partner and the Guardian herself. The Guardian's law practice is now under a safety and security risk due to the conduct of the mother and her legal cooperatives. Further, the parties owe a balance of over \$14,000.00 for services rendered by the Guardian. As a result of the extraordinary circumstances that render this Motion necessary, the Guardian is not seeking payment as to same.

IV. CONCLUSION

While the Guardian took an interim step to seek protection of the Court so that she could continue to serve as GAL pursuant to the appointment of the Court, the Guardian has now concluded that she is unable to continue to serve this matter as a result of the conduct laid out herein. Given same, this Guardian has reluctantly filed this motion and only does so because of the intolerable and dangerous conditions created by the mother, her legal counsel, and her witnesses. Thus, the Guardian respectfully requests that this Honorable Court immediately grant her Motion to Withdraw and issue an Order as to same.

Respectfully submitted this the 2nd day of APRIL, 2025.

Fennell, Briasco & Associates
2230 Towne Lake Parkway
Building 600-Suite 140
Woodstock, Georgia 30189
770-479-0248 (Office and Fax)
caryn@fbalawfirm.com

/S/ CARYN S. FENNEL
Caryn S. Fennell
Georgia Bar No. 723326
Guardian Ad Litem


Re: Ry [REDACTED]

From Caryn Fennell <caryn@fbalawfirm.com>

Date Mon 3/10/2025 11:37 AM

To rebecca@mclawslawgroup.com <rebecca@mclawslawgroup.com>

Cc Holly Holliman <holly@speightslaw.com>; Caryn Fennell <caryn@fbalawfirm.com>; Kelly Thornton <kelly@fbalawfirm.com>; Gloria McConnell <gloria@speightslaw.com>; [REDACTED]
<rosalyn@mclawslawgroup.com>

 2 attachments (355 KB)

9.18.23 - [REDACTED]

[REDACTED]

I have copied Holly's office on this email chain so we are all on the same page.

The answer to your specific question is no. My admin researched the calls and reported her findings from our Engage board. These are the facts:

1. Mr. H [REDACTED] called on September 18, 2023, and briefly spoke with my receptionist requesting a consultation.
2. Mr. H [REDACTED] indicated he had a VA attorney he wanted someone to partner with and that he had a hearing the following week.
3. My Sr. Paralegal Kelly posted about what she reviewed from the record on ICON as to the pending pleading.
4. I was on a leave of absence with my family. Lacey was out of the office, but she responded to the post saying we could not take the consult due to timelines.
5. My staff called Mr. Hawkins back and left a message and they apparently exchanged missed calls until a message was delivered to Mr. Hawkins.
6. No further contact was had.

A copy of the post on our Engage board is attached.

Warm regards,

Caryn Fennell

Senior Partner



2230 Towne Lake Parkway
Building 600, Suite 140
Woodstock, GA 30189
Phone/fax: 770-479-0248

EXHIBIT A

caryn@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

Fbalawfirm.com

NOTICE: IN-OFFICE APPOINTMENTS MUST BE PRE-SCHEDULED. WE ARE UNABLE TO ACCOMMODATE WALK-IN APPOINTMENTS OR NON-SCHEDULED VISITS.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied (cc) on a response to this e-mail, then you are not an intended recipient. No attorney-client relationship shall be created without an executed fee agreement or engagement letter. If you believe you have received this message in error, notify the sender immediately and permanently delete the e-mail, any attachment, and all copies thereof and destroy any printouts.

From: [REDACTED].com>

Sent: Friday, March 7, 2025 4:47 PM

To: Caryn Fennell <caryn@fbalawfirm.com>

Subject: Ryan Hawkins

Caryn,

Did you have a consultation with R [REDACTED] s in September 2023? Phone records show 7 calls around 9 18 23.

[REDACTED]

M

Law | Group | LLC

March 11, 2025

VIA ELECTRONIC MAIL
AND VIA REGULAR MAIL

Caryn Fennell, Esq.
Fennell Briasco & Associates
Building 600
2230 Towne Lake Park, Suite 140
Woodstock, Georgia 30189

RE: [REDACTED]
In the Superior Court of Cherokee County
Civil Action File No.: 24 [REDACTED]

Dear Caryn,

This correspondence is intended to serve as my client's revocation for any release(s) she previously executed allowing you to obtain information about her. This specifically revokes prior HIPPA authorizations relating to my client's mental health records, any information relating to Veteran's Court, or any other release about my client.

Sincerely,

RWM/
Cc: [REDACTED]

EXHIBIT C



Outlook

Fw: OFW Access Removed

From Kelly Thornton <kelly@fbalawfirm.com>
Date Wed 3/26/2025 2:46 PM
To Kelly Thornton <kelly@fbalawfirm.com>

From: info@ourfamilywizard.com <info@ourfamilywizard.com>
Sent: Friday, March 14, 2025 9:58:05 PM
To: Caryn Fennell <caryn@fbalawfirm.com>
Subject: OFW Access Removed

[REDACTED]
OurFamilyWizard activity. Please contact us if you have any questions.

Cordially,

The OurFamilyWizard Team

info@ourfamilywizard.com [REDACTED]

Fax: (952) 548-8159

Help Line: US (866) 755-9991 / AUS 1800 823 469 / NZ 0800 453 751 / UK 02035140008

[OurFamilyWizard](#)

This communication contains privileged and confidential information and is intended only for the use of the above-named recipient. You, the intended or unintended recipient, are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited without expressed consent of its sender. If you have received this communication in error, please notify sender and destroy this message immediately.

EXHIBIT D



Outlook

Re: [REDACTED] Meeting Scheduling

From [REDACTED]

Date Mon 3/17/2025 12:11 PM

To Kelly Thornton <kelly@fbalawfirm.com>; [REDACTED]

Cc Caryn Fennell <caryn@fbalawfirm.com>

Please do not communicate anything with me from this office without copying my attorney on the matter. I will ask her how this will be handled.

On 2025-03-17 11:07, Kelly Thornton wrote:

[REDACTED]

Caryn asked me to reach out to you to set up a meeting. The meeting can either be held via Microsoft Teams or can be in-person. Please let us know which you would prefer and then I can provide you with dates/times depending upon what you select.

Warm regards,

Kelly R. Thornton

Senior Paralegal

They/Them



2230 Towne Lake Parkway

Building 600, Suite 140

Woodstock, GA 30189

Phone/fax: 770-479-0248

kelly@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

Fbalawfirm.com

NOTICE: In-office appointments must be pre-scheduled. We are unable to accommodate walk-in appointments or non-scheduled visits.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied

EXHIBIT E

Re: HA [REDACTED] ng

From [REDACTED] n>

Date Tue 3/18/2025 6:40 AM

To Caryn Fennell <caryn@fbalawfirm.com>

Cc Kelly Thornton <kelly@fbalawfirm.com>; [REDACTED]; Holly Holliman <holly@speightslaw.com>; Gloria McConnell <gloria@speightslaw.com>; [REDACTED]
[REDACTED]

Caryn,

You have a conflict of interest that was only disclosed when we asked about it. The conflict, coupled with your interference with the DFCS investigation, and your baseless accusations against me in open court that were solely intended to inflame the Court and bolster your position as Mr. H [REDACTED] advocate and attorney, raises serious concerns about your impartiality. As I indicated before, my client and I will not interact with you until the Court rules on the pending Motions. If denied, then I will be moving to remove you from this case.

You should voluntarily withdraw given the conflict of interest that you failed to disclose at the beginning of your appointment. But, I don't expect you to do the right thing without further involvement by the Court.

[REDACTED]

On 2025-03-17 22:05, Caryn Fennell wrote:

Re [REDACTED]

I am in receipt of your email below. I am copying both counsels on this response so we are all on the same page.

I understand per your email below, coupled with your client's retraction of my OFW access and your letter dated March 11, 2025, received in my office on March 14, 2025 and proceeded today given my out of office status Friday at a CLE, that your client is no longer cooperating in the Guardian investigation or complying with the court's Guardian Order. I assume this retraction of cooperation by your client applies to your client's witnesses, but if I am incorrect, then please let me know.

Given your below email and recent letter, then I expect to be ready to issue recommendations soon and given same, this case can proceed immediately to mediation and then a final trial should mediation not be successful.

I ask both counsels to remember that my staff are working at my direction. Thus, they will not respond to emails as the one below when such an email with the content therein is directed at them. They are simply trying to do their job, and emails should not be directed at them that require confirmation of legal, ethical or other considerations as they are not licensed attorneys or authorized by court order to address same. If you

EXHIBIT F

have such a need to address these matters, then please address me directly and I will be more than happy to respond accordingly.

I hope everyone has a good evening.

Warm regards,

Caryn Fennell

Senior Partner



2230 Towne Lake Parkway

Building 600, Suite 140

Woodstock, GA 30189

Phone/fax: 770-479-0248

caryn@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

Fbalawfirm.com

NOTICE: IN-OFFICE APPOINTMENTS MUST BE PRE-SCHEDULED. WE ARE UNABLE TO ACCOMMODATE WALK-IN APPOINTMENTS OR NON-SCHEDULED VISITS.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied (cc) on a response to this e-mail, then you are not an intended recipient. No attorney-client relationship shall be created without an executed fee agreement or engagement letter. If you believe you have received this message in error, notify the sender immediately and permanently delete the e-mail, any attachment, and all copies thereof and destroy any printouts.

From: [REDACTED]

Sent: Monday, March 17, 2025 12:31 PM

To: [REDACTED]

Cc: Kelly Thornton <kelly@fbalawfirm.com>; [REDACTED] Caryn Fennell <caryn@fbalawfirm.com>

Subject: Re: [REDACTED] ing Scheduling

Kelly,

My client will not be meeting with Caryn until there is a ruling on the Habeas Petition and Emergency Motion. If Judge Davis denies the return of the child to my client immediately, I will be filing Motions that will need to be addressed, including, but not limited to, a Motion relating to Ms. Fennell's unethical conduct in this case. Until there is resolution of those Motions, my client and I will not be meeting with or communicating with Ms. Fennell except as necessary and required by the law.

Please confirm receipt.

R [REDACTED]

On 2025-03-17 12:10, [REDACTED]

Please do not communicate anything with me from this office without copying my attorney on the matter. I will ask her how this will be handled.

On 2025-03-17 11:07, Kelly Thornton wrote:

[REDACTED]

Caryn asked me to reach out to you to set up a meeting. The meeting can either be held via Microsoft Teams or can be in-person. Please let us know which you would prefer and then I can provide you with dates/times depending upon what you select.

Warm regards,

Kelly R. Thornton

Senior Paralegal

They/Them



2230 Towne Lake Parkway

Building 600, Suite 140

Woodstock, GA 30189

Phone/fax: 770-479-0248

kelly@fbalawfirm.com

Hours of Operation: 8:30 am – 5:00 pm M-F

fbalawfirm.com

NOTICE: In-office appointments must be pre-scheduled. We are unable to accommodate walk-in appointments or non-scheduled visits.

CONFIDENTIALITY NOTICE: This e-mail and all attachments herein contain information from Fennell, Briasco & Associates, that may contain privileged attorney/client communications and/or work product and is solely for the use of the intended recipient(s). Intended recipients are only those directly named in the TO or CC address lines of this e-mail. Any dissemination or use of this e-mail by anyone other than an intended recipient is prohibited. If you are forwarded a copy of this e-mail, blind carbon copied (bcc) or carbon copied (cc) on a response to this e-mail, then you are not an intended recipient. No attorney-client relationship shall be created without an executed fee agreement or engagement letter. If you believe you have received this message in error, notify the sender immediately and permanently delete the e-mail, any attachment, and all copies thereof and destroy any printouts.

EXHIBIT D: LETTER TO JUDGE DAVIS

To: Judge Jennifer Davis, Cherokee County Superior Court
Re: Case Number: 20 [REDACTED]

Judge Davis:

My name is Justin Cawthon. I have consulted with counsel regarding my current predicament as it pertains to your April 2, 2025 Order releasing Attorney Caryn Fennell from her duties as Guardian ad Litem and making certain findings of “concern” regarding my conduct in this case without notice, service, or opportunity to be heard. I was advised to attempt direct communication first before spending the money to file a formal intervention in the case.

Ms. Fennell's filings — which the Court adopted without an evidentiary hearing — falsely portray her as a victim driven off the case, or “bullied”, by intimidation, when in fact, she was challenged for documented ethical violations, false statements, and interference with DFCS investigations. As a law school graduate and Army Officer, I find the procedural shortcuts and factual distortions employed here to be deeply alarming and damaging not only to my rights, but to the integrity of these proceedings.

For context, I knew Ms. Fennell during law school, where we had repeated negative interactions stemming from petty disagreements over seating arrangements. My girlfriend at the time was in a wheelchair and had to sit at the end of the table, and Ms. Fennell seemed to resent that my girlfriend's need for my assistance precluded her from being able to sit in her preferred spot. I recognized Ms. Fennell's name when I got the e-mail requesting to meet with me and I had assumed these petty disputes were behind us. I know Ms. Fennell disclosed at the beginning of the case that she went to law school with the Defendant.

For the record: I have never threatened Ms. Fennell. I sent a single email — professional and appropriately critical — in response to a meeting request from her paralegal. My concerns focused solely on her professional misconduct. As a former Guardian ad Litem in Florida dependency cases, I recognized and raised valid alarms about Ms. Fennell's false statements to the Court, her interference with an active DFCS investigation, her combative demeanor in court, and her obsessive focus on irrelevant years-old text messages. Moreover, it is not just my opinion that Ms. Fennell's conduct raises concerns. Reports from the local legal community, and private admonitions by Judges confirm a troubling pattern of behavior.

Ms. Fennell's invocation of my pending misdemeanor charge is opportunistic and misleading. ***The charge — which involves no violence, dishonesty, or reckless conduct — was known to her before she requested a meeting and became relevant to her narrative only after she faced professional criticism.*** I intend to take that charge to trial, and I have no intention of pleading guilty.

The Court's vague, prejudicial findings against me have now created an official record that could be improperly used against me in these unrelated criminal proceedings through similar transaction evidence or in aggravation at a potential sentencing — a profoundly unjust consequence for someone who was never given notice and an opportunity to be heard. I respectfully demand that the Court vacate all findings of concern related to my involvement in this case. I have consulted with counsel and am prepared to move formally to intervene if necessary, but I was advised to attempt resolution through direct correspondence first. Furthermore, I intend to seek reinstatement of my top secret security clearance upon resolution of this matter. This harmful and prejudicial information on the public record about me via your Court Order will obstruct that effort tremendously. Not only is Ms. Fennell seeking to harm my criminal case through submitting orders to the Court regarding what she alleges to be “concerning” conduct, Ms. Fennell is publishing false information to third parties that I am in violation of my bond conditions as part of her agenda and proverbial thirst for blood. ***And contrary to her claims, the bar complaint the Defendant filed against Ms. Fennell was not dismissed; it was administratively deferred pending the final outcome of these proceedings — a fact she has omitted in an apparent attempt to mislead the Court.***

Beyond the personal harm caused to me, this matter raises serious questions about the fairness of these proceedings. Ms. Fennell's motion and the Court's Order were executed within mere hours — with the Order filed by Ms. Fennell herself. How does Ms. Fennell even have the ability to file an Order signed by the Court through her own Odyssey E-filing login? This highly irregular and improper sequence suggests both unlawful ex parte communications and a mechanical rubber-stamping of Ms. Fennell's motion without deliberation. Either way, the public's trust in this Court's impartiality has been gravely compromised. Should the Court refuse to correct this, I am prepared to pursue formal complaints to the Judicial Qualifications Commission, the State Bar of Georgia, and speak to whoever I can that will bring public scrutiny to these proceedings.

This latest incident shouldn't come as a surprise given the precedent the Court has set for deference towards Mr. Hawkins and prioritizing professional connections with the Speights Firm over the child's best interests. While I am not in contact with the Defendant I do closely follow this case for obvious reasons. Indeed, the Court's willingness to disregard six sworn witnesses' testimony regarding Mr. Hawkins' alcohol abuse is egregious and enabling as he continues to drag this child from bar to bar every weekend. Instead of protecting the child, this Court has shown deference to an unstable, vengeful parent with a documented history of alcohol issues, while emotionally damaging the child by severing her bond with the only consistent caregiver she has ever known. I am also flummoxed at the recent Order accusing the Defendant of “manipulating” the circumstances when she keeps getting hauled into Court by a man who steadfastly refuses to accept any custodial arrangement outside of removing the Mother entirely from

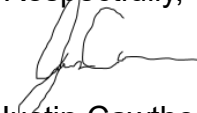
the child's life. Expecting a woman to endure legal assaults without exercising her full rights — and punishing her for defending herself — enforces the misogynistic belief that women should be obedient and deferential even when attacked. A court that scorns a woman for asserting technical or procedural defenses, while tolerating a man's refusal to compromise, is not neutral. It is actively participating in the very gender oppression it purports to rise above. Cherokee County has a reputation for beating down women and bias in the Court system and it is on full display in this custody case.

Notwithstanding the above commentary I have reluctantly accepted that this Court is committed to destroying this child. And while that breaks my heart the reality is that I have no legal power to stop it. However, I will not sit quietly while false findings are entered against me without notice and allow this Court to destroy me as well. If the Court fails to vacate this baseless Order, I will treat it as a fundamental violation of my due process rights, and I will pursue every available legal, administrative, and public remedy to redress the misconduct and correct the record. The harm to the child in this case may be shielded by judicial discretion, but the harm done to me will not be ignored as I exercise every lawful means available to address it.

Dr. Catherine Dudik and Ms. Isabel Rivera—two other witnesses of the Defendant—have also had troubling encounters with Ms. Fennell. I know Dr. Dudik has consulted with counsel and has a troubling recording of a phone conversation with Ms. Fennell. I will leave it to them to inform the Court as to how they are going to redress this matter, but they are also taking it seriously. We have NEVER seen an officer of the Court take such an unnecessarily obsessive interest (driving hours to get decades old court papers, making histrionic filings) and act with such dereliction of their duties (informing Dr. Dudik on a recorded call that it is NOT her job to look out for the child's best interests while obsessively focusing on 3 year old text messages). I hope the Court can do the right thing as it pertains to this matter immediately.

In conclusion—I am asking this Court to vacate finding of “concern” in an Order issued in response to Caryn Fennell's motions about my behavior when there was no notice and opportunity to be heard given to me as this stands to prejudice my misdemeanor criminal proceedings and my subsequent attempts for reinstatement of my top secret security clearance as I rebuild my life from this unnecessary hysteria.

Respectfully,



Justin Cawthon

cc: Holly Holliman; [REDACTED]; Caryn Fennell; Dr. Catherine Dudik; Isabel Rivera



Filing Returned

Envelope Number:
18024352

Case Number: [REDACTED]
Case Style: [REDACTED]

The filing below has been reviewed and has been returned for further action. **Please refile with the corrections outlined below.** Please, contact the appropriate court help center for further information.

Return Reason(s) from Clerk's Office	
Court	Cherokee County
Returned Reason	Rejected
Returned Comments	Your filing is being rejected pursuant to the Judge's office. "Please reject. It does not appear that the individual filing this pleading is a party to this pending civil action. Please refrain from sending any ex parte communication to this office pursuant to Uniform Superior Court Rule 4.1." Thank you-cg

To learn how to copy the rejected filing so that you can make changes to refile, [click here](#)