

NO. 09-0135

FILED FOR RECORD
HARRISON COUNTY, TEXAS
DISTRICT COURT

2015 APR 21 PM 2:50

IN THE INTEREST OF

*

IN THE DISTRICT COURT

L.T.F.W.,

*

Mary Durham
HARRISON COUNTY, TEXAS

A CHILD

*

71ST JUDICIAL DISTRICT

NOTICE OF HEARING

PLEASE TAKE NOTICE that a hearing for temporary orders on the Petition in Intervention, Petition to Modify, and Motion for Temporary Orders filed herein by Intervenor, SHIRLEY GROSS, and Movant, YUQIONG TENG, has been set for 9:15 o'clock a.m. on the 29th day of April, 2015.

SIGNED this 21st day of April, 2015.

Joe Black

JUDGE PRESIDING

A TRUE COPY
of the Original hereof, I certify
Sherry Griffis
District Court Clerk
Harrison County, Texas

By

Mary Durham
Deputy Clerk

***** CITATION *****

TO: LARRY WATTS
303 N. Washington, No. A
Marshall, Texas 75670
or wherever he may be found

*
*
*
*

STATE OF TEXAS

RESPONDENT IN THE HEREINAFTER STYLED AND NUMBERED CAUSE:

YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE DISTRICT COURT OF HARRISON COUNTY, TEXAS, TO BE HELD AT THE COURTHOUSE OF SAID COUNTY IN THE CITY OF MARSHALL, HARRISON COUNTY, TEXAS, BY FILING A WRITTEN ANSWER TO THE PETITION OF INTERVENOR AND MOVANT AT OR BEFORE 10:00 A.M. ON THE MONDAY NEXT AFTER THE EXPIRATION OF 20 DAYS AFTER THE DATE OF SERVICE HEREOF, A COPY OF WHICH ACCOMPANIES THIS CITATION, IN **CAUSE NO. 09-0135**, STYLED:

IN THE INTEREST OF

LARRY TENG FEI WATTS,

A CHILD

ATTORNEY FOR INTERVENORS
RONALD NED DENNIS
P. O. BOX 299
MARSHALL, TEXAS 75671
903/938-3746
903/938-6012 (FAX)

FILED IN SAID COURT ON THE 21st DAY OF APRIL, 2015.

21st ISSUED AND GIVEN UNDER MY HAND AND SEAL OF SAID COURT IN MARSHALL, TEXAS, THIS THE DAY OF APRIL, 2015.

**SHERRY GRIFFIS, DISTRICT CLERK
HARRISON COUNTY COURTHOUSE
200 W. HOUSTON, SUITE 234
MARSHALL, TEXAS 75670**

BY: Mary Oluka
DEPUTY

NOTICE TO RESPONDENT

YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF 20 DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU.

OFFICER/AUTHORIZED PERSON RETURN

CAME TO HAND AT 3:00 O'CLOCK P.M. ON THE 21st DAY OF APRIL, 2015, AND EXECUTED AT (ADDRESS) 303 N. Washington, # A IN HARRISON COUNTY AT 3:40 O'CLOCK P.M. ON THE 22nd DAY OF APRIL, 2015, BY DELIVERING TO Cindy Carr for LARRY WATTS, RESPONDENT, A TRUE COPY OF THIS CITATION TOGETHER WITH THE ACCOMPANYING COPY OF THE PETITION IN INTERVENTION, PETITION TO MODIFY, AND MOTION FOR TEMPORARY ORDERS AND NOTICE OF HEARING ATTACHED THERETO AND I ENDORSED ON SAID COPY OF THE CITATION THE DATE OF DELIVERY.

TO CERTIFY WHICH I AFFIX MY HAND OFFICIALLY THIS 22nd DAY OF APRIL, 2015.

Lizbeth King
AUTHORIZED PERSON DELIVERING CITATION

THE STATE OF TEXAS *
COUNTY OF HARRISON *

This instrument was acknowledged before me this the _____ day of _____, 2015, by _____.

Notary Public, State of Texas

NO. 09-0135

FILED FOR RECORD
HARRISON COUNTY, TEXAS
DISTRICT COURT

2015 APR 21 PM 2:30

IN THE INTEREST OF

*

IN THE DISTRICT COURT

L.T.F.W.,

*

HARRISON COUNTY, TEXAS

A CHILD

*

71ST JUDICIAL DISTRICT

PETITION IN INTERVENTION
PETITION TO MODIFY
MOTION FOR TEMPORARY ORDERS
IN SUIT AFFECTING THE PARENT-CHILD RELATIONSHIP

This Petition in Intervention is brought by SHIRLEY GROSS, joined herein by YUQIONG TENG, Movant. In support, Intervenor and Movant show:

1. Parties

Intervenor is the paternal grandparent of the child the subject of this suit. Intervenor has standing to intervene in this proceeding as more fully detailed below.

The last three numbers of SHIRLEY GROSS' driver's license number are 027. The last three numbers of SHIRLEY GROSS' Social Security number are 550.

Movant is the mother of the child the subject of this suit. The last three numbers of YUQIONG TENG's driver's license number are 409. The last three numbers of YUQIONG TENG'S Social Security number are 797.

2. Jurisdiction

This Court has acquired and retains continuing, exclusive jurisdiction of this suit and of the child the subject of this suit as a result of prior proceedings.

3. Child

The following child is the subject of this suit:

TRUE AND CORRECT COPY

NAME: LARRY TENG FEI WATTS
SEX: Male
BIRTH DATE: July 27, 2006
BIRTHPLACE: Nanning, China
COUNTY OF RESIDENCE: Harrison

4. Father

The father of the child the subject of this suit is LARRY WATTS. Process should be served at 303 N. Washington Ave., No. A, Marshall, Texas 75670, his last known address, or wherever he may be found.

5. Court-Ordered Relationships

There are no court-ordered conservatorships, court-ordered guardianships, or other court-ordered relationships affecting the child the subject of this suit other than the parties.

6. Property

There has been no change of consequence in the status of the property of the child the subject of this suit since the prior order was rendered.

7. Conservatorship

It is in the best interest of the child that Intervenor be appointed a joint managing conservator of the child. LARRY WATTS, a parent of the child has voluntarily relinquished possession and control of the child to Intervenor for a period of one year or more, a portion of which was within ninety days preceding the date of intervention. The child has resided with SHIRLEY GROSS for a period of more than four (4) years. The exact whereabouts of LARRY WATTS is unknown to Intervenor.

The order to be modified is not based on a mediated or collaborative law settlement agreement. The circumstances of the child, a conservator, or other party affected by the order to be modified have materially and substantially changed since the date of rendition of the order to be modified.

Movant requests that she be appointed a joint managing conservator of the child and that LARRY WATTS be appointed a possessory conservator of the child.

The requested modification is in the best interest of the child.

8. Request for Temporary Orders

Intervenor requests the Court, after notice and hearing, to make temporary orders for the safety and welfare of the child, including but not limited to the following:

Appointing Intervenor temporary joint managing conservator with the exclusive right to designate the primary residence of the child within Harrison County, Texas.

Appointing Movant, YUQIONG TENG, temporary joint managing conservator of the child.

Appointing Respondent, LARRY WATTS, a possessory conservator of the child.

Granting Movant, YUQIONG TENG, the exclusive right to apply for a Chinese passport for the child, LARRY TENG FEI WATTS and the exclusive right to apply for a U. S. Passport for the child, LARRY TENG FEI WATTS.

Granting Movant, YUQIONG TENG, the right to maintain possession of the passports of the child.

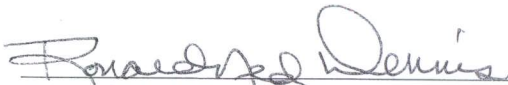
Granting Movant, YUQIONG TENG, the right to take the child on visits to China.

9. Prayer

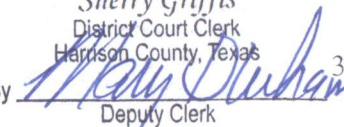
Intervenor and Movant pray for relief as requested in this petition.

Intervenor and Movant pray for general relief.

Respectfully submitted,



Ronald Ned Dennis
Attorney at Law
P. O. Box 299
Marshall, Texas 75671-0299
903/938-3746
903/938-6012 (fax)
State Bar No. 05753000

A TRUE COPY
of the Original hereof, I certify
Sherry Griffis
District Court Clerk
Harrison County, Texas
By  3
Deputy Clerk