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Robert Kearns  
R.R. 3, Box 254A1  
Hollidaysburg, PA 16648

In re: Kearns vs. Kearns  
In Custody

Dear Mr. Kearns:

This will confirm receipt of your facsimile transmission yesterday, wherein you indicated a desire to alter the direction of this matter so as to put before the court the issue of primary residential and legal custody, as opposed to the current request for partial custody.

Your comments regarding the experts intended to be witnesses and the court reflect a genuine animosity and distrust that I no doubt believe was earned throughout the tortuous history of this custody action. I also believe that the natural mother played a significant role in casting you as the demon in all these matters. However, these circumstances (no matter how unjust and unfairly imposed) constitute the context in which the judge specially presiding must consider the case. You have simply not had adequate physical custody (either by choice following Judge Carpenter's ruling, or as a result of resistance posed by the natural mother) in order to provide the court with a foundation in which to grant a transfer of primary physical custody.

The basis of your position rests upon a perception that her experts are offering nothing but bogus diagnoses, unnecessary or fraudulent treatment plans and opinions against resuming unsupervised contact with you based upon misperceptions, falsehoods and hidden agendas. Essentially, you believe that a request for primary custody will be successful because of the presumption that the court will recognize the thin ice underlying all of the experts' opinions. This success will not only touch upon the sociological issues (resumption of contact with you), but also the biological/medical (psychiatric diagnoses).

However, without a comprehensive expert opinion that can credibly counter those that will be offered by Attorney Aigner, there is only a slim likelihood of successfully impeaching the opposing experts on these types of matters. There is simply too much history already accepted by the court for this proceeding to bring into question and doubt the circumstances underlying your current situation. The type of independent evaluation that must be commissioned in order