

Anthony J. Zaroni, Esquire
Attorney At Law

Benton Building
513 Allegheny Street
Hollidaysburg, PA 16648
(814) 696-3232 fax (814) 696-8235

August 23, 2001

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

In re: Lou Ann Frederick vs. Robert Kearns, Jr.
No. 2139 C.P. 1996 In Custody

Dear Mr. Kearns:


Please find enclosed a copy of the letter that I sent today via facsimile transmission in regards to your request for counsel's "permission" to pass a note from Rachel to Stephanie during a scheduled visit. I hope to have a response from Attorney Mears before Monday.

I have also enclosed a copy of the Petition for Modification which I drafted. In anticipation of your letter dated August 22, 2001, I prepared the document to file on short notice if you will be required to present a formal request to the court for modification of the existing custody order. I hope to avoid lengthy proceedings and move directly towards a more normal partial custody schedule. In light of the high quality visits that you have had with Stephanie, I am optimistic that a resolution can be reached without the formality and cost of continuing all the way to another evidentiary hearing. Attorney Mears informally expressed her optimism at the courthouse the other day when we saw each other on another matter. Of course, I will keep you abreast of my discussions and progress.

Please review the petition. If it meets with your approval, sign, date and return the Verification to my office. On the other hand, should you desire changes to the document, please mark same on the enclosed copy and return it to my office with the completed Verification. I will then make the alternations and file the document as soon as it becomes apparent that a formal petition will be necessary.

Thank you for your attention and consideration in this matter.

Sincerely,


Anthony J. Zaroni