

NO. UWY-FA- 10-4022991-S : SUPERIOR COURT
WILLIAM GROHS : JD OF WATERBURY
VS. : AT WATERBURY
KELLY W. GROHS : July 31, 2017

**MOTION FOR EMERGENCY HEARING POST JUDGMENT AND
FOR FURTHER RELIEF**

The plaintiff in the above-captioned matter respectfully prays that this court order that an emergency hearing be conducted and that orders be entered protecting the parties two (2) minor children from further disclosure, dissemination or publication of personally identifying information and/or private information which is privileged and protected by law for their benefit.

In support hereof, the plaintiff represents that:

1. The parties are the parents of two (2) minor children, both females, ages 9 and 8, whose custody is the subject of a currently pending Motion for Modification;
2. By Stipulation dated August 2, 2012, the court ordered that "... Neither party shall make, or encourage any third party who is not a mandated reporter to make, any knowingly false report of injury, abuse or neglect

with any person, including, without limitation, the Department of Children and Families or any other governmental agency...”

3. On July 26, 2017, the internet blog located at

<https://familycourtcircusblog.wordpress.com/>

published, via hyperlink, a letter dated October 2, 2012, from Guardian ad Litem, Mary Piscatelli Brigham, to Attorneys Julie Porzio and Randolph Richardson III. Such letter contains personally identifying information about one (1) of the minor children which deals with an unsubstantiated, false report of injury, abuse or neglect as determined by the Connecticut Department of Children and Families.

4. Such letter, as published on such website, is not contained in the public court file concerning this case and, upon the undersigned’s best information knowledge and belief, was not disclosed to any third party by the author, the two (2) attorneys to whom such letter was directed or the plaintiff but rather by the defendant.

5. On July 28, 2017, the internet blog located at

<https://familycourtcircusblog.wordpress.com/> published information

about one or both of the parties two minor children that is not within

the public record but is only contained in the record of the Connecticut Department of Children and Families.

6. Copies of such records are sealed exhibits in the present pending motions before this court, such copies having been sealed by The Honorable Lloyd Cutsumpas. See court order appears on file.
7. Upon the plaintiff's best information, knowledge and belief the false report of injury, abuse or neglect published on such website was provided to a third party for the purpose of publication by the defendant.
8. The actions of the defendant in publishing, making, encouraging to make or publish, transmitting or otherwise disseminating to third party, violates this court's order as aforesaid and causes significant and substantial harm to the minor children.
9. In support of the plaintiff's assertion that the defendant is directly or indirectly making or encouraging to make false reports of injury/abuse about one or both of the parties minor children, the plaintiff directs the Court to <https://familycourtcircusblog.wordpress.com> dated July 29, 2017, where in paragraph 3, the blogger states that "the skunk of the Bar

had the mother in Grohs v. Grohs served this morning with a demand for a deposition on every aspect of mom's financial struggles."

10. The only way the blogger would know that a Notice of Deposition and Subpoena Duces Tecum was served upon the defendant was from the defendant herself as such Notice of Deposition nor the Subpoena Duces Tecum are public record.

11. Neither of the minor children in 2012 were able to read, understand or appreciate the unsubstantiated and false reports originated by the defendant. However, both of the minor children have unrestricted and unfiltered access to the Internet while in their mother's home as determined by their school officials, the Family Relations Officer assigned to conduct the court ordered study in this case as well as the children's court appointed Guardian ad Litem. Both minors are very capable of reading now as well.

12. The children's emotional and physical well being and safety are in jeopardy by continuing to reside in the physical care of the defendant who has shown reckless and willful disregard for their physical and emotional well being and safety as alleged herein. The children will be exposed to

further substantial harm unless the physical custody of the two (2) minor children is immediately transferred to the plaintiff until the final trial of this matter which is not yet been scheduled

WHEREFORE, the plaintiff prays:

- A. That the Court immediately order physical custody of the two (2) minor children be transferred to the plaintiff until further order of the court;
- B. For an order directing the defendant to remove or cause to remove under penalty of contempt blog publications referenced in this motion;
- C. That the defendant be enjoined under penalty of contempt from further dissemination of confidential, personally identifying and other information concerning the two (2) minor children;
- D. For a monetary fine to be imposed upon the defendant;
- E. For such other relief as to law or equity might appertain.

THE PLAINTIFF, William Grohs

By: 

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CERTIFICATION

I hereby certify that a copy of the foregoing was or will immediately be mailed or delivered electronically or non-electronically on July 31, 2017 to all counsel and pro se parties of record and that written consent for electronic delivery was received from all counsel and pro se parties of record who were or will immediately be electronically served.

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Michael A. Fasano

ORDER

The foregoing Motion, having been heard and considered by the Court, it is hereby ORDERED: GRANTED / DENIED.

AND THAT:

BY THE COURT
