

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

IN THE MATTER OF
SOPHIA COULOUTE

File #: 204566
Docket #: NN 02494-17

MATTHEW COULOUTE, JR.
Respondent

NOTICE OF MOTION
PURSUANT TO NY DOM.
REL LAW SECTION
76-g EXPENSES

PLEASE TAKE NOTICE that, upon the annexed Affirmation of Matthew Coulotte Jr., the exhibits attached hereto and all the other papers and proceedings heretofore had herein, the respondent Matthew Coulotte Jr. will move this Court at the Erie County Family Courthouse, One Niagara Plaza Buffalo, NY, 14202 2nd Floor, Part 4 at 9:00 am November 29, 2017 for an Order: assessing cost, expenses, fees and child care pursuant to NY Domestic Relations Law Section 76-g.

Dated: Cumming, Georgia
November 9, 2017

By: 

Matthew Coulotte Jr. Pro Se
3210 Lakeheath Dr.
Cumming, GA 30041
860.879.8951

FAMILY COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

IN THE MATTER OF
SOPHIA COULOUTE

File #: 204566
Docket #: NN-02494-17

MATTHEW COULOUTE, JR.

**PETITION FOR
EXPENSES PURSUANT
TO NY. DOM. REL. LAW
SECTION 76-g**

Respondent

Pursuant to New York Domestic Relations Law Section 76 -g (3) this Respondent, Matthew Couloute Jr., is requesting that the Court assess fees and expenses against the Parties Mr. Patrick Haidon and Ms. Lauren Haidon who sought to invoke jurisdiction but, were denied the same pursuant to NY Domestic Relations Law Section 76-g . The Petitioner seeks, pursuant to statute "necessary and reasonable expenses including costs, communication expenses, attorney's fees, investigative fees, expenses for witnesses, travel expenses, and child care". This Respondent request that the assessment be made against Respondent/Petitioner Lauren Haidon and Petitioner Patrick Haidon jointly and severally.

Dated 11/9, 2017



Matthew Couloute Jr.
3210 Lakeheath Dr.
Cumming, GA
860.879.8951

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IN THE MATTER OF
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File #: 204566
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MATTHEW COULOUTE, JR.

Respondent

**AFFIRMATION IN
SUPPORT OF 76-g
PETITION.**

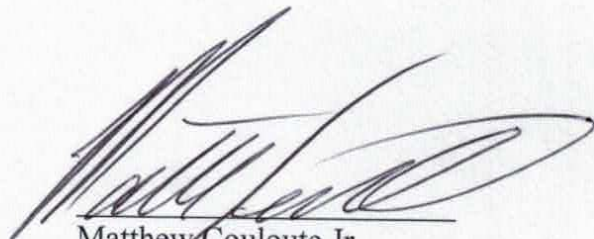
Matthew Couloute Esq. an attorney duly licensed to practice law in the State of Connecticut affirms the following under the penalty of perjury:

1. I am one of the named Respondents in the above captioned matter.
2. On July 18, 2017 a "Decision and Order" was entered by Honorable Judge LoVallo resolving all of the outstanding issues regarding the above captioned matter.
3. Said Order, dismissed Petitions Filed by Respondent/Petitioner Lauren Haidon and Petitioner Patrick Haidon as well as dismissing the Neglect Petition brought by the New York Department of Social Services.
4. Within said Order, there was a finding that Ms. Haidon's actions in bringing the minor to the Erie County was "unjustifiable conduct" and could not create jurisdiction where none would exist. (See page 11 and 12 of Decision and Order)
5. As a direct result of the Petitions filed by Mr. Patrick Haidon and Ms. Lauren Haidon and as a direct result of Ms. Haidon's unjustifiable conduct, I incurred expenses in excess of \$35,000.00 as found in Exhibit 1 attached hereto.

mw

WHEREFORE, for all of the above reasons, this Respondent respectfully request that the Court assess against Ms. Lauren Haidon and Mr. Patrick Haidon jointly and severely all fees, expenses and cost pursuant to statute and any and all fees, expenses and costs that the court deem appropriate. And, any other equitable relief that the Court in its discretion determines suitable or proper.

Dated: November 9, 2017

A handwritten signature in black ink, appearing to read 'Matthew Couloute Jr.', written in a cursive style with a large loop at the end.

Matthew Couloute Jr.
3210 Lakeheath Drive
Cumming, GA 30041
860.879.8951

CERTIFICATION

I hereby certify that a copy of the foregoing Motion For Expenses, has been mailed in care of the United States Postal Service postage prepaid and emailed this 9 day of November 2017 to:

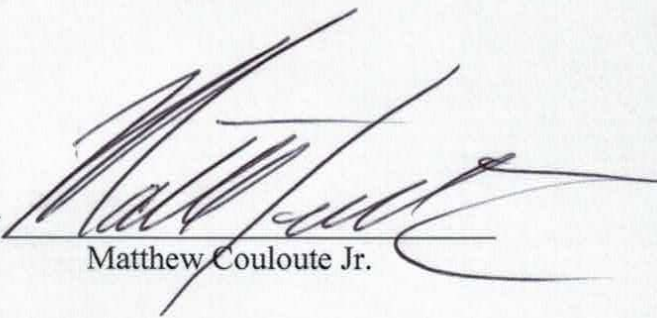
Patrick Haidon
81 Liberty Lane
West Seneca, NY

Kelly Ball
403 Main St, Suite 420
Buffalo, NY 14203

Lauren Haidon
81 Liberty Lane
West Seneca, NY

Lauren Creighton
Erie County Department of Social Services
Office of Legal Affairs
95 Franklin St., Room 851
Buffalo, NY 14202

By


Matthew Couloute Jr.