IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT BREVARD COUNTY, FLORIDA CASE NO.: 2024-DR-52505

IN RE: THE FORMER MARRIAGE OF:

THOMAS HUDSON,

Petitioner,

and

SHAUNTEL HUDSON,

Respondent.

EMERGENCY MOTION FOR TEMPORARY RELIEF

COMES NOW the Petitioner in the above-styled cause, THOMAS HUDSON, by and through the undersigned attorney and Moves this Honorable Court for Temporary Relief on an emergency basis and as grounds therefore does state:

- 1. There are two remaining minor children that are subject to the action to wit: T.H. (DOB */*/2009), and B.H. (DOB */*/2016).
- 2. The oldest child of the parties reached age eighteen while in the care of the Petitioner.
- 3. The adult child of the parties alleged a violent altercation between himself, the mother, and her paramour that led to him residing with the Petitioner.
- 4. The parties' sixteen-year-old child has been residing with the Respondent.
- 5. The Respondent has denied the Petitioner's time sharing with the remaining minor children.
- 6. The Respondent took the remaining minor children on a cruise with a step child of her paramour.
- 7. The sixteen year old child is now a suspect in the death of the step child during the cruise.
- 8. While released from custody, the sixteen-year-old child is residing with a third party.

- 9. The parties were granted a Final Judgment of Dissolution of Marriage on February 21, 2023 in Lee County, Florida despite the parties residing during their marriage in Hernando County.
- 10. An Order Ratifying Joint Stipulation to Modify Parenting Time was entered on April 10, 2024 in Lee County Florida.
- 11. The Joint Stipulation to Modify Parenting Time was made an order of the Court.
- 12. The Petitioner was ordered to have parenting time with the children.
- 13. The Respondent is denying the Petitioner parenting time with the two youngest children and has denied his ordered parenting time since her relocation.
- 14. The Respondent is willfully violating the orders of the Court.
- 15. The Respondent is continuing to alienate the two youngest children from the Petitioner.
- 16. The parties' agreement regarding relocation was supposed to be reviewed at the end of the 2024-2025 school year.
- 17. The sixteen-year old's future has been put in jeopardy because of the choices made by the Respondent.
- 18. The Petitioner has not been allowed input into the children's lives and his lack of involvement has negatively impacted the children.
- 19. The youngest child is at immediate risk of abuse, abandonment, or neglect in the care of the Respondent.
- 20. The Petitioner has retained the undersigned attorney and is duly indebted to the same for the reasonable fees and costs incurred in this matter.

WHEREFORE, the Petitioner respectfully requests that the Court enter an order:

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- 1. Placing the youngest child in the care of the Petitioner.
- 2. Addressing the placement of the sixteen-year-old child.
- 3. Awarding the father additional parenting time based upon the denial of parenting time.
- 4. Requiring that the parties cooperate with appropriate services for the minor children. And,
- 5. Awarding the Petitioner attorney's fees and costs to be paid by the Respondent.

RESPECTFULLY SUBMITTED this 17 day of November, 2025.

UNDER PENALTIES OF PERJURY, I DELCARE THAT I HAVE READ THIS DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

THOMAS HUDSON Petitioner/Father

STATE OF FLORIDA COUNTY OF HERNANDO

Sworn to and subscribed before me by means of physical presence this 17 day of November, 2025 by THOMAS HUDSON who is personally known to me or has produced Personally known as identification.

MELISSA A TAYLOR
Notary Public - State of Florida
Commission # HH 204420
My Comm. Expires Dec 12, 2025
Bonded through National Notary Assn.

Melissa a Taylor Notary Public, State of Florida

/s/ Scott Timothy Smith
SCOTT TIMOTHY SMITH, ESQUIRE
Attorney for Petitioner
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(352) 796-7434

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ScottTSmithPA@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to
illicent B. Athanason, Esq.: millya@aol.com and millysparalegal@gmail.com via e-service delivery
s \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
/s/ Scott Timothy Smith
SCOTT TIMOTHY SMITH, ESQUIRE