

INDEPENDENCE COUNTY, ARKANSAS
CIRCUIT CLERK GREG WALLIS
FILED FOR RECORD BY
CARMEN DUNCAN D.C.

DATE: MARCH 6, 2020

TIME: 14:00:29

COURT USE ONLY PURSUANT TO ARK SUP. CT. ADMIN. ORDER NO. 2(B)

IN THE CIRCUIT COURT OF INDEPENDENCE COUNTY, ARKANSAS

LUNDEN ALEXIS ROBERTS

PLAINTIFF

vs.

ROBERT HUNTER BIDEN

DEFENDANT

Case No: 32DR-19-187

1ST DIV.

RENEWED MOTION FOR CONTEMPT
AND FOR ORDER TO SHOW CAUSE

COMES NOW the plaintiff, by and through her attorneys, LANCASTER & LANCASTER LAW FIRM, PLLC, and for her motion states:

1. That this Court previously ordered that the defendant could cure any alleged contempt by providing overdue financial documents to the plaintiff no later than March 1, 2020.

2. That the defendant has partially complied with providing requested documentation. However, again, the defendant has continued to flaunt the orders of this Court by failing to answer discovery, comply with court orders, and provide his financial information.

3. That the defendant has failed to provide the following documents or information as previously ordered:

- A. All financial institutions used by him or a business he owns or controls;
- B. The address in which he resides;
- C. The address where his wife resides;

ORIGINAL
LANCASTER LAW FIRM

- D. Addresses where he has resided for the past five years;
- E. Whether he received mail or packages at an address in West Hollywood, California;
- F. His telephone number;
- G. His wife's telephone number;
- H. A list of all companies he currently owns or in which he has an ownership interest and the state in which those companies are incorporated;
- I. A list of all companies in which he has had an ownership interest in the past five years as well as the state in which those companies are incorporated;
- J. A list of all sources of income for the past five years;
- K. A list of all employers for the past five years;
- L. An unredacted copy of his tax returns;
- M. Tax documents for companies he owns or in which he has an ownership interest;
- N. A copy of deeds to properties that he owns or in which he has an ownership interest; and
- O. An executed copy of the requested financial records release.

This discovery has been outstanding since August 2019 and remains outstanding at the time this motion was filed.

4. That the defendant has failed to comply with the Court's amended order because he has not provided his 2017 personal tax return, 2018 personal tax returns, and all documents showing money he received in the past five years.

5. That the defendant's conduct is willful and contemptuous. This Court should enter an order compelling the defendant to appear at the March 13, 2020,

hearing in this case and show cause as to why he should not be held in contempt.

6. That the defendant should be found in contempt.

7. That the defendant continues to act as though he has no respect for this Court, its orders, the legal process in this state, or the needs of his child for support. This Court should take some action that will make the defendant follow court orders and a believer in the rule of law.

8. That this Court should sanction the defendant as it deems appropriate and just. Pleading further, any sanction should include full compliance with the Court's previous orders so that child support can be set according to Arkansas law. Such action in the best interests of the child in this case.

9. That this is but another example of the defendant's unnecessary actions to frustrate prompt adjudication of this matter and increase the plaintiff's litigation costs. This Court should order the defendant to pay the plaintiff's attorneys' fees and costs for bringing this motion and for any hearings related to this motion.

WHEREFORE, the plaintiff moves this honorable Court to order the defendant to appear and show cause; find him in contempt and sanction him as appropriate and just; for attorneys' fees and costs; and for all other just and proper relief.

Respectfully Submitted,

**LANCASTER & LANCASTER
LAW FIRM, PLLC**

P.O. Box 1295

Benton, Arkansas 72018

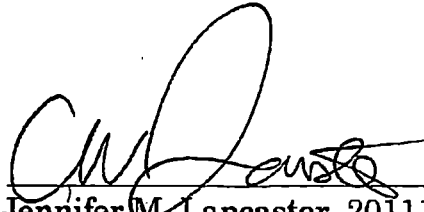
P: (501) 776-2224

F: (501) 778-6186

E: jennifer@thelancasterlawfirm.com

E: clint@thelancasterlawfirm.com

By:



Jennifer M. Lancaster, 2011178
Clinton W. Lancaster, 2011179

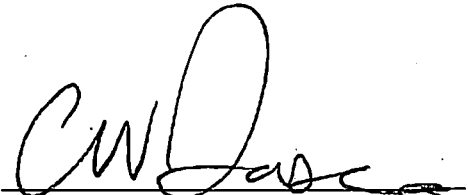
CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been delivered by the below method to the following person or persons:

First Class Mail Facsimile Email AOC/ECF Hand Delivery

Brent Langdon
blangdon@ldatty.com

on this 6 DAY of MARCH, 2020.


Clinton W. Lancaster