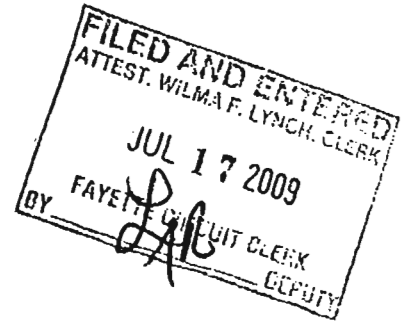


COMMONWEALTH OF KENTUCKY
FAYETTE FAMILY COURT
1st DIVISION
CASE NO. 09-D-102-001



AMANDA CEABERRY LEE ROSS

PETITIONER/PLAINTIFF

V.

STEPHEN R. NUNN

RESPONDENT/DEFENDANT

**VERIFIED MOTION TO HOLD RESPONDENT IN CONTEMPT OF COURT
OR IN THE ALTERNATIVE
TO AMEND THE COURT'S DOMESTIC VIOLENCE ORDER**

Comes now Petitioner, Amanda Ceaberry Lee Ross, by and through Counsel, and Moves this Honorable Court to declare the Respondent, Stephen R. Nunn, in Contempt of this Court's Domestic Violence Order of Protection (hereinafter "DVO") entered against Mr. Nunn on March 4, 2009, and to subject the Respondent to the punishment the Court deems appropriate. In the alternative, Petitioner asks the Court to Amend the March 4, 2009 DVO to provide additional protection to the Petitioner. In support of her Motion, Ms. Ross states:

On February 17, 2009, Stephen R. Nunn became physically violent with Petitioner while at Petitioner's home, and in a fit of rage and by his own admissions in sworn testimony before this Court, struck Petitioner numerous times about the head and shoulders causing serious, documented, physical injuries. With the assistance of officers from the LFUCG police department, criminal assault charges were filed against Respondent and remain pending in the Fayette District Court No. 09-M-02098. The Fayette District Court further provided protection to Petitioner by issuing an Emergency Protective Order against Respondent on February 18, 2009. After a full hearing from all parties and their witnesses, including the testimony of the

Respondent, this Court granted a DVO against the Respondent on March 4, 2009. Despite the terms and conditions of this Court's DVO, "[t]hat the . . . Respondent [be] restrained from any contact or communication with the . . . Petitioner", Respondent has engaged in deplorable and unseemly conduct, contact, and communications with third parties that has violated the spirit and intent of this Court's orders, all in an attempt to humiliate, threaten and embarrass the Petitioner, a participant in a legal proceeding. Part of this contact involves tampered photographs produced and published by the Respondent.

Petitioner seeks the protections of this Court through its Contempt power or, alternatively, the additional protections of this Court in Amending the DVO currently in place in order to further curtail Respondent's conduct with regard to Petitioner, and requests a hearing forthwith so that this Court may be fully advised. It is requested that the Amended DVO prohibit the Respondent from any further acts of domestic violence and abuse, including any activity designed to alarm, annoy, harass, or intimidate the Petitioner. *See*, for example, KRS 508.130. This Court's Amended Order of Protection can provide that the Respondent shall not molest, malign, interfere with or disturb the Petitioner in any manner whatsoever, including contact with third parties.

Respectfully submitted,

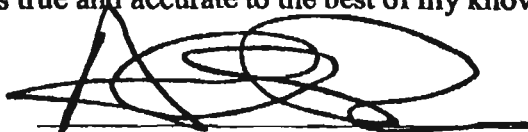
HURT, CROSBIE & MAY, PLLC

By: 

James L. Deckard
Matthew R. Malone
The Equus Building
127 W. Main Street
Lexington, Kentucky 40507
859-254-0000
859-254-4763 Facsimile
COUNSEL FOR PETITIONER

VERIFICATION

I hereby verify that the foregoing is true and accurate to the best of my knowledge and belief.



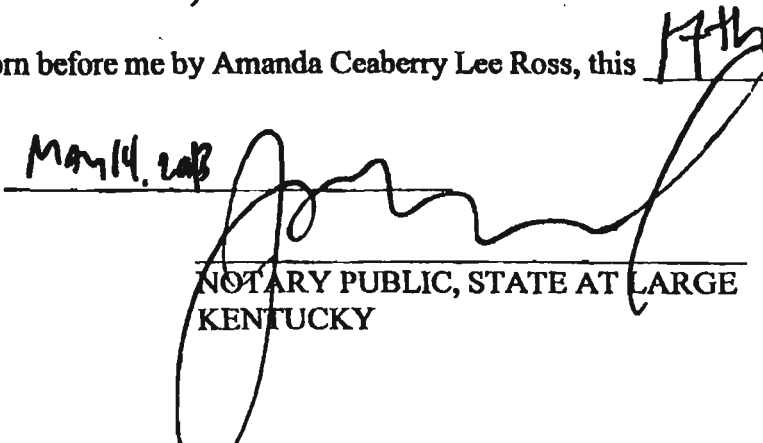
Amanda Ceaberry Lee Ross

COMMONWEALTH OF KENTUCKY)
COUNTY OF FAYETTE)

Subscribed to and sworn before me by Amanda Ceaberry Lee Ross, this 17th day of July, 2009.

My Commission Expires:

May 14, 2013



NOTARY PUBLIC, STATE AT LARGE
KENTUCKY

NOTICE OF HEARING

Be advised that the foregoing matter will come on for a hearing before the Fayette Circuit Court, 1st Division, in Courtroom 1, on Wednesday July 29, 2009, at the hour of 8:30 a.m. or as soon thereafter as counsel may be heard.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been served via first class U.S. mail on this the 17th day of July, 2009, upon the following:

Hon. Michael R. Moloney
175 E. Main St.
Lexington, KY 40507



COUNSEL FOR PETITIONER