No. __26-643__

In the Supreme Court of the United States

CHRISTINE L. MORRISON,

Petitioner,

v.

EDWARD M. HANNAFORD,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI
TO THE SUPREME COURT OF MICHIGAN

PETITION FOR WRIT OF CERTIORARI

SEPTEMBER 2026

QUESTION PRESENTED

Whether the Due Process Clause of the Fourteenth Amendment permits a State to enforce a judgment as a consent judgment when the record contains no affirmative evidence of actual consent and affirmatively demonstrates that the parties did not consent.

PARTIES TO THE PROCEEDINGS

Petitioner, and plaintiff-appellant below is Christine L. Morrison.

Respondent, and defendant-appellee below is Edward M. Hannaford.

RELATED PROCEEDINGS

Circuit Court of Michigan (Macomb Cty.)::

Edward Michael Hannaford v. *Christine Lynn Morrison*, No. 1995–004609–DM (Aug. 11, 2025) (motion for relief from judgment denied)

Michigan Court of Appeals:

In re Morrison, No. 377022 (Sept. 5, 2025) (complaint for superintending control dismissed)

Edward M. Hannaford v. *Christine L. Morrison*, No. 377911 (Apr. 27, 2026) (delayed application for leave to appeal denied)

Michigan Supreme Court:

Edward M. Hannaford v. *Christine L. Morrison*, No. 170104 (Jul. 17, 2026) (application for leave to appeal denied; judgment sought to be reviewed)

TABLE OF CONTENTS

Question Presented i

Parties to the Proceedings ii

Related Proceedings ii

Table of Authorities vi

Opinions Below 1

Jurisdiction 1

Constitutional Provision Involved 1

Statement of the Case 1

Reasons for Granting the Petition 3

I. This Case Presents an Important and Recurring Federal Question 4

II. The Record Does Not Demonstrate Actual Consent 5

III. This Case Is an Appropriate Vehicle for Review 6

IV. Review Is Warranted to Clarify Constitutional Standards Governing Consent Judgments 7

V. The Court Can Provide Effective Relief 8

Conclusion 9

Appendix

Appendix A

Order [motion to expedite granted, application for leave to appeal the April 27, 2026 order denied], Michigan Supreme Court, *Edward M. Hannaford* v. *Christine L. Morrison*, No. 170104 (July 17, 2026) App–1

Appendix B

Order [complaint for superintending control dismissed], State of Michigan Court of Appeals, *In re Morrison*, No. 377022 (Sep. 5, 2025) App–3

Appendix C

Order [delayed application for leave to appeal denied], State of Michigan Court of Appeals, *Edward M. Hannaford* v. *Christine L. Morrison*, No. 377911 (April 27, 2026) App–4

Appendix D

Order [motion for relief denied], State of Michigan, County of Macomb 16th Judicial Circuit Court, *Edward Michael Hannaford* v. *Christine Lynn Morrison*, No. 1995-004609-DM (Aug. 11, 2025) App–5

Appendix E

Consent Judgment of Annulment, State of Michigan Circuit Court for the County of Macomb, *Edward Michael Hannaford* v. *Christine Lynn Morrison*, No. 1995-004609-DM (Aug. 19, 1997) App–7

Appendix F

Amended Consent Judgment of Annulment, State of Michigan Circuit Court for the County of Macomb, *Edward Michael Hannaford* v. *Christine Lynn Morrison*,
No. 1995-004609-DM (Sep. 2, 1997) App–10

Appendix G

Second Amended Consent Judgment of Annulment, State of Michigan Circuit Court for the County of Macomb, *Edward Michael Hannaford* v. *Christine Lynn Morrison*,
No. 1995-004609-DM (Sep. 8, 1997) App–12

Appendix H

Docket Sheet, State of Michigan Circuit Court for the County of Macomb, *Edward Michael Hannaford* v. *Christine Lynn Morrison*,

No. 1995-004609-DM (Aug. 19 - Oct. 22, 1997)
..... App–14

Appendix I

Transcript of Proceedings, State of Michigan Circuit Court for the County of Macomb, *Edward Hannaford* v. *Christine Lynn Morrison*,
No. 1995-004609-DM (Mar. 8, 1999) App–19

Appendix J

Transcript of Proceedings, State of Michigan Circuit Court for the County of Oaklan, *Christopher P. Aiello, P.C.* v. *Christine Lynn Morrison* v. *Christopher P. Aiello,*
No. 00-020759-CK (Aug. 20, 2001) App–22

1 [Counsel: "This was not a consent."] App–25

2 [Counsel stipulation: "The clients did not sign either amendment." "Or the original."] ... App–26

TABLE OF AUTHORITIES

Cases

D. H. Overmyer Co. v. *Frick Co.*,
405 U. S. 174 (1972) 4–7

Fuentes v. *Shevin*,
407 U. S. 67 (1972) 4–5, 7

Mullane v. *Central Hanover Bank & Trust Co.*,
339 U. S. 306 (1950) 4–5, 7

Texas v. *New Mexico*,
602 U. S. 943 (2024) 4

United States v. *Ward Baking Co.*,
376 U. S. 327 (1964) 4

Constitutional Provisions, Statutes, and Rules

U. S. Const. Amdt. XIV, §1 ..... 1, 3–5, 7–8

28 U. S. C. §1257(a) 1

S. Ct. R. 10(c) 4

S. Ct. R. 13.1 1

OPINIONS BELOW

The order of the Michigan Supreme Court denying the application for leave to appeal is unreported and reproduced in the Appendix at App. 1–2. The Michigan Court of Appeals order denying the delayed application for leave to appeal is unreported and reproduced in the Appendix at App. 4. The Macomb County Circuit Court order denying relief from judgment is unreported and reproduced in the Appendix at App. 5–6. A related Michigan Court of Appeals order dismissing the complaint for superintending control is unreported and reproduced in the Appendix at App. 3.

JURISDICTION

The Michigan Court of Appeals denied Petitioner's delayed application for leave to appeal on April 27, 2026. App. 4. The Michigan Supreme Court denied discretionary review on July 17, 2026. App. 1–2. This Court has jurisdiction under 28 U. S. C. § 1257(a). This petition is timely under Supreme Court Rule 13.1 because it is filed within 90 days after the Michigan Supreme Court denied discretionary review.

CONSTITUTIONAL PROVISION INVOLVED

U. S. Const., Amdt. 14, § 1, provides in relevant part: "Nor shall any State deprive any person of life, liberty, or property, without due process of law."

STATEMENT OF THE CASE

On August 19, 1997, the Macomb County Circuit Court entered a document captioned "Consent Judgment of Annulment." App. 7–9. Neither party

signed the judgment. App. 9. Petitioner's counsel signed beneath the notation "Approved as to form only"; counsel for Respondent also signed the judgment. Ibid. Amendments captioned "Amended Consent Judgment of Annulment" and "Second Amended Consent Judgment of Annulment" were entered on September 2 and September 8, 1997. App. 10–13. Neither amendment bears the signature of either party or counsel. App. 11, 13.

On March 8, 1999, Petitioner stated on the record, "I never consented or signed that and neither did my attorney." App. 20. The court responded that her attorney had signed the judgment; Petitioner answered, "He said to form only, not content." Ibid.

On August 20, 2001, during a separate attorney-malpractice proceeding, counsel stated, "This was not a consent." App. 25. Later in the same proceeding, counsel stipulated that the clients did not sign either amendment and agreed that the original judgment likewise lacked the clients' signatures. App. 26.

On August 11, 2025, the Macomb County Circuit Court denied Petitioner's motion for relief from judgment "for the reasons stated on the record." App. 5–6. The Michigan Court of Appeals dismissed Petitioner's complaint for superintending control on September 5, 2025, because an appeal from that order was available. App. 3. Petitioner then filed a delayed application for leave to appeal, which the Court of Appeals denied on April 27, 2026, "for lack of merit in the grounds presented." App. 4. The Michigan Supreme Court denied leave to appeal on July 17, 2026, because it was "not persuaded that the questions presented should be reviewed." App. 1.

Petitioner raised the federal due-process question in her motion for relief from judgment and continued to present that question through the delayed application for leave to appeal and the application for leave to appeal to the Michigan Supreme Court. The orders reproduced in the appendix did not separately analyze the federal question; the Court of Appeals denied the delayed application "for lack of merit in the grounds presented," App. 4, and the Michigan Supreme Court denied discretionary review, App. 1–2. This petition seeks review of that preserved federal question.

REASONS FOR GRANTING THE PETITION

This case presents an important constitutional question concerning whether a State may enforce a purported consent judgment when the record contains no affirmative manifestation of Petitioner's actual consent and contains express statements disputing consent. A consent judgment derives its authority from the parties' agreement rather than adjudication on the merits. When a State enforces a judgment as consent-based without actual consent, it imposes the legal consequences of agreement without the agreement that gives such a judgment its authority.

The question presented is not whether a state court made an ordinary error in interpreting a judgment or applying state law. It is whether the Due Process Clause permits a State to attribute consent to a party when the record affirmatively indicates that consent was not given. This petition therefore presents a federal constitutional question distinct from an ordinary dispute over state contract or domestic-relations law.

S. Ct. R. 10(c) identifies as an appropriate consideration whether a state court has decided an important question of federal law that has not been, but should be, settled by this Court. This petition presents that question in the recurring context of consent judgments used to resolve disputes involving property, family-law interests, and other substantial rights.

This Court has recognized that a court may not enter a "consent" judgment disposing of a party's claims without that party's actual consent. *United States* v. *Ward Baking Co.*, 376 U. S. 327, 334 (1964). More recently, *Texas* v. *New Mexico* explained that a consent decree may not dispose of valid claims of a nonconsenting party and cited *Ward Baking* for the rule that a court may not enter a "consent" judgment without actual consent. 602 U. S. 943, 953–954 (2024).

This Court has also recognized that relinquishment of important procedural rights must be knowing and voluntary. *D. H. Overmyer Co.* v. *Frick Co.*, 405 U. S. 174, 185–186 (1972). Due process likewise requires fundamentally fair procedures before a State may deprive a person of protected interests. *Mullane* v. *Central Hanover Bank & Trust Co.*, 339 U. S. 306, 314 (1950); *Fuentes* v. *Shevin*, 407 U. S. 67, 80–82, 94–95 (1972). The Court has not, however, addressed the minimum constitutional showing required before a State may enforce a judgment specifically as one entered by consent when the record affirmatively disputes consent.

I. This Case Presents an Important and Recurring Federal Question

Review is warranted because the petition presents an important question of federal constitutional law

that has not been resolved by this Court and that arises in a procedural context frequently employed by state courts.

Consent judgments are used in state courts, particularly in family-law, property, and commercial disputes, as a substitute for adjudication. Because a consent judgment derives its distinctive authority from agreement, the constitutional question is what showing of consent is required before the State may impose the consequences of such a judgment. See *D. H. Overmyer Co.* v. *Frick Co.*, 405 U. S. 174, 185–186 (1972); *Fuentes* v. *Shevin*, 407 U. S. 67, 94–95 (1972).

The question is especially important where, as here, the record contains affirmative statements disputing consent rather than merely a silent or incomplete record. Clarification would provide a uniform constitutional standard for determining when a State may enforce a judgment as consent-based rather than adjudicated.

II. The Record Does Not Demonstrate Actual Consent

This case presents the question whether due process requires an affirmative manifestation of actual consent before a judgment may be enforced as a consent judgment. See *D. H. Overmyer Co.* v. *Frick Co.*, 405 U. S. 174, 185–186 (1972); *Fuentes* v. *Shevin*, 407 U. S. 67, 94–95 (1972). The Court has likewise emphasized that meaningful procedural safeguards are required before protected interests are deprived. See *Mullane* v. *Central Hanover Bank & Trust Co.*, 339 U. S. 306, 314 (1950).

Here, the original judgment bears no party signature. App. 9. Petitioner's counsel signed only

beneath the notation "Approved as to form only." Ibid. The two amendments bear no signatures of either party or counsel. App. 11, 13.

The record also contains express statements disputing consent. On March 8, 1999, Petitioner stated: "I never consented or signed that and neither did my attorney." App. 20.

On August 20, 2001, counsel stated, "This was not a consent." App. 25. Later, counsel stipulated that the clients had not signed either amendment and agreed that the original judgment also lacked their signatures. App. 26.

The constitutional defect asserted here is therefore not merely the absence of a written agreement. It is the enforcement of the judgment specifically as consent-based despite the absence of a party signature or express in-court assent by Petitioner and despite affirmative record statements disputing consent. Approval "as to form," without evidence of the client's actual assent to the judgment, does not itself demonstrate the knowing and voluntary consent on which the State relies. See *D. H. Overmyer Co.* v. *Frick Co.*, 405 U. S. 174, 185–186 (1972).

The amended judgments recite that proofs were taken in open court. App. 11, 13. But the issue presented here is narrower: whether the State may enforce these instruments as consent judgments without a constitutionally sufficient record demonstrating Petitioner's actual consent to that form of judgment.

III. This Case Is an Appropriate Vehicle for Review

This case cleanly presents the constitutional question on a documentary record. The relevant

materials include the original judgment and amendments, App. 7–13; the docket sheet, App. 14–18; Petitioner's 1999 on-the-record denial of consent, App. 20; and the 2001 statements and stipulation, reflecting the absence of consent and signatures App. 25–26.

Resolution does not require this Court to decide whether Michigan contract or domestic-relations law independently invalidates the judgment. The federal question is whether due process permits the State to enforce the judgment as consent-based on this record.

The question was preserved through the state proceedings and expressly presented to the Michigan Supreme Court. The Court of Appeals denied the delayed application "for lack of merit in the grounds presented," App. 4, and the Michigan Supreme Court denied discretionary review, App. 1–2. The case therefore provides a vehicle for resolving the federal question without further factual development.

IV. Review Is Warranted to Clarify Constitutional Standards Governing Consent Judgments

This Court's precedents recognize that important procedural rights may not be relinquished unless waiver is knowing and voluntary. *D. H. Overmyer Co.* v. *Frick Co.*, 405 U. S. 174, 185–186 (1972). They also require fundamentally fair procedures before protected interests are deprived. *Mullane* v. *Central Hanover Bank & Trust Co.*, 339 U. S. 306, 314 (1950); *Fuentes* v. *Shevin*, 407 U. S. 67, 80–82, 94–95 (1972).

Those decisions do not define the minimum constitutional record required before a State may enforce a judgment specifically as consent-based when consent

itself is disputed. The unresolved question is whether a State may rely on inference from procedural history or attorney conduct, or whether due process requires an affirmative, record-based manifestation of the party's actual consent.

This case presents that question in a clear posture. The record contains no signature by Petitioner on the original judgment or amendments, App. 9, 11, 13; Petitioner expressly denied consenting, App. 20; and the later transcript contains both the statement "This was not a consent" and a stipulation concerning the absence of client signatures, App. 25–26.

Clarification from this Court would provide a uniform federal standard while leaving ordinary questions of state contract formation and domestic-relations law to the state courts. It would address only the constitutional minimum required before a State attributes consent to a party and enforces a judgment on that basis.

V. The Court Can Provide Effective Relief

If the Court concludes that due process does not permit enforcement of the judgment as consent-based on this record, Petitioner respectfully requests that the Court vacate the August 19, 1997 "Consent Judgment of Annulment," the September 2, 1997 "Amended Consent Judgment of Annulment," and the September 8, 1997 "Second Amended Consent Judgment of Annulment," together with all subsequent orders to the extent their legal force or validity derives from those purported consent judgments, and remand for further proceedings consistent with its opinion.

On remand, the state courts shall give effect to that vacatur and shall not enforce or treat as operative the

vacated judgments or any derivative orders covered by the Court's vacatur. The state courts may address only matters that remain after that vacatur.

That disposition would remedy the asserted federal defect without requiring this Court to resolve state-law questions in the first instance. It would provide effective relief from the asserted constitutional defect while leaving the state courts to address only those matters that remain after the Court's vacatur.

CONCLUSION

This petition presents an important federal question concerning the constitutional showing required before a State may enforce a judgment as consent-based. Review is warranted because the record contains no party signature by Petitioner and includes express statements disputing consent.

The petition for a writ of certiorari should be granted.

Respectfully submitted.

Christine L. Morrison

Pro Se Petitioner

SEPTEMBER 2026

Appendix A

Order

July 17, 2026

SC: 170104 & (15)
COA: 377911
Macomb CC: 1995-004609-DM

EDWARD M. HANNAFORD,
Plaintiff-Appellee,

v

CHRISTINE L. MORRISON,
Defendant-Appellant.

Michigan Supreme Court
Lansing, Michigan

Megan K. Cavanagh,
Chief Justice

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

On order of the Court, the motion to expedite is GRANTED. The application for leave to appeal the April 27, 2026 order of the Court of Appeals is considered, and it is DENIED, because we are not persuaded that the questions presented should be reviewed by this Court.

ZAHRA, J., did not participate because he was on the Court of Appeals panel at an earlier stage of the proceedings.

I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

July 17, 2026 /s/ Elizabeth Kingston-Miller
Clerk

Appendix B

Court of Appeals, State of Michigan
ORDER

IN RE MORRISON
Docket No. **377022**
LC No. **1995-004609-DM**

Michael F. Gadola, Chief Judge, acting under MCR 7.203(F)(1), orders:

The complaint for superintending control is DISMISSED for lack of jurisdiction because an appeal from the August 11, 2025 order is available. MCR 3.302(D)(2). As a result, plaintiff may challenge the order in question by filing a delayed application for leave to appeal under MCR 7.205. See MCR 7.203(B)(1).

/s/ Michael F. Gadola

A true copy entered and certified by Jerome W. Zimmer Jr., Chief Clerk, on

September 5, 2025 /s/ Jerome W. Zimmer Jr.
Date Clerk

Appendix C

Court of Appeals, State of Michigan
ORDER

EDWARD M HANNAFORD V CHRISTINE L MORRISON	Michael F. Gadola Presiding Judge
Docket No. 377911	Christopher M. Trebilcock
LC No. 1995-004609-DM	Daniel S. Korobkin Judges

The delayed application for leave to appeal is DENIED for lack of merit in the grounds presented.

/s/ Michael F. Gadola
Presiding Judge

A true copy entered and certified by Jerome W. Zimmer Jr., Chief Clerk, on

April 27, 2026 /s/ Jerome W. Zimmer Jr.
Date Clerk

Appendix D
[Filed: Aug. 11, 2025]

STATE OF MICHIGAN COUNTY OF MACOMB 16th JUDICIAL CIR- CUIT COURT	**ORDER**	Case No. 1995- 004609-DM HON. TRACEY A. YOKICH

EDWARD MICHAEL HANNAFORD
Plaintiff(s)

Attorney: Pro Se/FTA P#
EMAIL:

vs

CHRISTINE LYNN MORRISON
Defendant(s)

Attorney: Pro Se/FTA P#
EMAIL:

At a session of the Court, held on August 11, 2025

Denying Defendant's Motion for Relief From Judgment Pursuant to MCR
ORDER OF 2.612(1)(d)
Title of Order

IT IS ORDERED:

For the reasons stated on the record, defendant's motion for relief from judgment is denied.

[Seal of County of Macomb State of Michigan]
/S/ TRACEY A. YOKICH
CIRCUIT COURT
JUDGE P38377

Approved as to form and substance by:
[Seal of County of Macomb State of Michigan]

_____
Signature of attorney for defendant

_____
Signature of attorney for plaintiff

Appendix E
[Filed: Aug. 19, 1997]

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

EDWARD MICHAEL HANNAFORD,
Plaintiff,

vs.

CHRISTINE LYNN MORRISON,
Defendant.
_____/

Case No. 95-4609-DM
HON: DEBORAH A. SERVITTO

CAPUTO BROSNAN P.C.
By: HAROLD A. PERAKIS (P-35921)
Attorneys for Plaintiff
29199 Ryan Road
Warren, Michigan 48092-4243
(810) 573-8900

CHRISTOPHER P. AIELLO (P-48091)
Attorney for Defendant
26393 Dequindre
Madison Heights, Michigan 48071
(810) 546-2211
_____/

CONSENT JUDGMENT OF ANNULMENT

At a session of said Court held
in the City of Mt. Clemens,
County of Macomb, State of Michigan,

ON: Aug 19 1997
PRESENT: DEBORAH A. SERVITTO
CIRCUIT COURT JUDGE

This cause having been brought on to be heard on the Plaintiff's Complaint filed herein, taken as confessed by the Defendant, and upon reading the

---

ACKNOWLEDGMENT

IT FURTHER ORDERED AND ADJUDGED that the parties have acknowledged that they have had a right to compulsory process to assist in discovery or verification of facts relevant to their respective rights and obligations in this litigation. They further acknowledge by virtue of consenting to entry of this Judgment that they are waiving such rights to the extent not heretofore exercised.

ATTORNEY FEES

IT IS FURTHER ORDERED AND ADJUDGED that each party shall pay his or her own attorney fees, except as otherwise provided, but if any monies are due and owing as of this date, they are specifically preserved herein and are the respective responsibility of each party. Further, if any attorney fees have not been paid in full prior to the date of entry of this Judgment of Divorce, each of the attorneys shall have lien rights on any asset of their respective client and garnishment rights against the respective client's income.

/s/
CIRCUIT COURT JUDGE

APPROVED AS TO FORM AND SUBSTANCE:
CAPUTO BROSNAN P.C.

	Approved as to form only
By: /s/ Harold A. Perakis	/s/ Christopher P. Aiello
HAROLD A. PERAKIS (P-35921)	CHRISTOPHER P. AIELLO (P-48091)
Attorneys for Plaintiff	Attorneys for Defendant
(810) 573-8900	(810) 548-2211
EDWARD MICHAEL HANNAFORD, Plaintiff	CHRISTINE LYNN MORRISON, Defendant.

Appendix F
[Filed: Sep. 2, 1997]

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

EDWARD MICHAEL HANNAFORD,
Plaintiff,

V

CHRISTINE LYNN MORRISON,
Defendant.
_____/

Case No. 95-4609-DM
Hon: SERVITTO

HAROLD A. PERAKIS (P 35921)
Attorneys for Plaintiff
29199 Ryan Road
Warren, Michigan 48092-4243
(810) 573-8900

CHRISTOPHER P. AIELLO, P.C.
BY: CHRISTOPHER P. AIELLO (P 48091)
Attorney for Defendant
26393 Dequindre
Madison Heights, Michigan 48071
(248) 546-2211
_____/

AMENDED CONSENT JUDGMENT OF ANNULMENT

At a session of said Court, held in the Circuit Court, County of Macomb, State of Michigan

ON: Sep 2 1997
PRESENT: Hon: DEBORAH A. SERVITTO
CIRCUIT COURT JUDGE

This cause having been brought on to be heard on the Plaintiff's Complaint filed herein, taken as confessed by the Defendant, and upon reading the Complaint and hearing proofs taken in open Court, this Court finds sufficient facts, from Plaintiff's testimony, to support Plaintiff's request for Annulment;

ATTORNEY FEES

IT IS FURTHER ORDERED AND ADJUDGED that each party shall pay his or her own attorney fees, except as otherwise provided, but if any monies are due and owing as of this date, they are specifically preserved herein and are the respective responsibility of each party. Further, if any attorney fees have not been paid in full prior to the date of entry of this Judgment of Annulment, each attorney shall have lien rights on any asset of their respective client and garnishment rights against the respective client's income.

DEBORAH A. SERVITTO
CIRCUIT COURT JUDGE

APPROVED AS TO FORM AND SUBSTANCE:

HAROLD A. PERAKIS (P 35921) Attorneys for Plaintiff	CHRISTOPHER P. AIELLO (P 48091) Attorneys for Defendant
EDWARD MICHAEL HANNAFORD, Plaintiff	CHRISTINE LYNN MORRISON, Defendant.

Appendix G
[Filed: Sep. 8, 1997]

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

EDWARD MICHAEL HANNAFORD,
Plaintiff,

V

CHRISTINE LYNN MORRISON,
Defendant.
_____/

Case No. 95-4609-DM
Hon: SERVITTO

HAROLD A. PERAKIS (P 35921)
Attorneys for Plaintiff
29199 Ryan Road
Warren, Michigan 48092-4243
(810) 573-8900

CHRISTOPHER P. AIELLO, P.C.
BY: CHRISTOPHER P. AIELLO (P 48091)
Attorney for Defendant
26393 Dequindre
Madison Heights, Michigan 48071
(248) 546-2211
_____/

SECOND AMENDED CONSENT JUDGMENT OF ANNULMENT

At a session of said Court, held in the Circuit Court, County of Macomb, State of Michigan

ON: Sep 8 1997
PRESENT: Hon: DEBORAH A. SERVITTO
CIRCUIT COURT JUDGE

This cause having been brought on to be heard on the Plaintiff's Complaint filed herein, taken as confessed by the Defendant, and upon reading the Complaint and hearing proofs taken in open Court, this Court finds sufficient facts, from Plaintiff's testimony, to support Plaintiff's request for Annulment;

ATTORNEY FEES

IT IS FURTHER ORDERED AND ADJUDGED that each party shall pay his or her own attorney fees, except as otherwise provided, but if any monies are due and owing as of this date, they are specifically preserved herein and are the respective responsibility of each party. Further, if any attorney fees have not been paid in full prior to the date of entry of this Judgment of Annulment, each attorney shall have lien rights on any asset of their respective client and garnishment rights against the respective client's income.

DEBORAH A. SERVITTO
CIRCUIT COURT JUDGE

APPROVED AS TO FORM AND SUBSTANCE:

HAROLD A. PERAKIS (P 35921) Attorneys for Plaintiff	CHRISTOPHER P. AIELLO (P 48091) Attorneys for Defendant
EDWARD MICHAEL HANNAFORD, Plaintiff	CHRISTINE LYNN MORRISON, Defendant.

Appendix H

Date: 06/02/2009 12:48:49 Docket Sheet Page: 43
MIJRS925

No.	Filed	Action	Opera-tor	Fine/ Cost	Due
707	10/22/97	PROOF OF SERVICE	cnvMA Cdk95		0.00
708	10/22/97	RE-NOTICE OF TAKING DEPOSI-TION	cnvMA Cdk95		0.00
709	09/18/97	PROOF OF SERVICE	cnvMA Cdk95		0.00
710	09/18/97	NOTICE OF TAKING DEPOSI-TION	cnvMA Cdk95		0.00
711	09/16/98	PROOF OF SERVICE	cnvMA Cdk95		0.00
712	09/10/97	CHRIS KUHN	cnvMA Cdk95		0.00
713	09/10/97	DEBORAH A SERVITTO CLK A CIAVATTA	cnvMA Cdk95		0.00

714	09/08/97	CHRIS KUHN	cnvMA Cdk95	0.00
715	09/08/97	DEBORAH A SERVITTO CLK A CIAVATTA	cnvMA Cdk95	0.00
716	09/08/97	PROOF OF SERVICE	cnvMA Cdk95	0.00
717	09/08/97	NOTICE OF PRESENT-MENT OF ORDER SEC-OND AMEND CNST JUDG-MNT OF DIV-SGD	cnvMA Cdk95	0.00
718	09/02/97	LINDA BRAZZEL	cnvMA Cdk95	0.00
719	09/02/97	DEBORAH A SERVITTO CLK B FELTON	cnvMA Cdk95	0.00
720	09/02/97	PROOF OF SERVICE	cnvMA Cdk95	0.00
721	09/02/97	NOTICE OF	cnvMA	0.00

		ENTRY UNDER 7 DAY RULE AMENDED CONSENT JUDGMENT OF ANNUL DAS	Cdk95	
722	08/26/97	PROOF OF SERVICE	cnvMA Cdk95	0.00
723	08/26/97	NTC OF TKG DEPOS	cnvMA Cdk95	0.00
724	08/22/97	TRANS PROCEEDINGS BEFORE DAS ON 6/3/97 R/F ON FILE	cnvMA Cdk95	0.00
725	08/19/97	CASE CLOSED CONSENT JUDGMENT OF ANNULMENT SGD	cnvMA Cdk95	0.00
726	08/19/97	CHRIS KUHN	cnvMA Cdk95	0.00
727	08/19/97	DEBORAH A	cnvMA	0.00

		SERVITTO CLK K HARFST	Cdk95	
728	08/19/97	PROOF OF SERVICE	cnvMA Cdk95	0.00
729	08/19/97	JUDGMENT SIGNED	cnvMA Cdk95	0.00
730	08/19/97	PERAKIS (ENTRY OF JDMNT OF ANNUL-MENT) CONSENT JUDGMENT OF ANNUL-MENT SGD DEF SUPP BRF IN SUPT OF MTN MTN TO CHANGE CUST-DE-NIED, ALL PARTIES TO GO TO COUNSEL-ING W/L HENDER-SON-SGD	cnvMA Cdk95	0.00

731	08/19/97	AIELLO (MODIFY CUSTODY/ SHOW CAUSE)	cnvMA Cdk95	0.00

Appendix I

[Cover Page]

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

EDWARD HANNAFORD,
Plaintiff,

-vs- Case No. 95-4609-DM

CHRISTINE LYNN MORRISON,
Defendant.
_____/

PROCEEDINGS

BEFORE THE HONORABLE PETER J. MACERONI, (p-16922) JUDGE

Mount Clemens, Michigan – Monday, March 8, 1999

APPEARANCES:
For the Plaintiff(s): In Pro Per

For the Defendant(s): In Pro Per

REPORTED BY: Susan L. Hassig, CSR-0939
Official Court Reporter
(810) 469-5851

[End of Cover Page]

[Page 14]

give that to him?

THE COURT: Consent judgment of annulment. What is your issue regarding the consent judgment of annulment?

CHRISTINE MORRISON: The validity of it. I never consented or signed that and neither did my attorney.

THE COURT: Your attorney did.

CHRISTINE MORRISON: He said to form only, not content.

THE COURT: Miss Morrison, you are objecting to items that have been entered almost two years ago. And that's entitled consent judgment of annulment.

CHRISTINE MORRISON: Not without a signature

THE COURT: That was approved as to form only, and as far as Mr. Aiello was concerned and signed by Mr. Perakis, and if there was any problem with that it should have been appealed a long time ago.

CHRISTINE MORRISON: I never consented. Can you tell me why on my docket sheet I have asked for asset discovery more than thirty times; it was granted but the orders were never

[End of Page 14]

[Page 25]

THE COURT: You are welcome.

CHRISTINE MORRISON: And the consent judgment of annulment papers?

THE COURT: (Handing down) Anything else?

CHRISTINE MORRISON: That's it.

THE COURT: See you Tuesday at 10:30.

CHRISTINE MORRISON: Okay.

(Proceedings concluded at 3:19 p.m.)

– – –

[End of Page 25]

Appendix J

[Pages 1-3]

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

CHRISTOPHER P. AIELLO, P.C., a Professional Michigan Corporation,
Plaintiff/Counter-Defendant;

vs. Case No. 00-020759-CK
Hon. Robert Templin

CHRISTINE LYNN MORRISON
Defendant/Counter Plaintiff
and Third Party Plaintiff;

vs.

CHRISTOPHER P. AIELLO, Individually,
Third Party Defendant.
----------/

Proceedings had and testimony taken in the above-entitled matter before HONORABLE ROBERT TEMPLIN, Oakland County Circuit Court, at 1200 N. Telegraph, Pontiac, on Monday, August 20, 2001.

APPEARANCES:

CHRISTOPHER P. AIELLO, P.C.
26393 Dequindre
Madison Heights, Michigan 48071
(By: Aaron D. Geyer, Esq.)

Appearing on behalf of Plaintiff/
Counter-Defendant

and Third Party Defendant Christopher P. Aiello

DANIEL J. HENRY, JR.
DOUGLAS A. McKINNEY
JOSEPH SLAVEN
34197 Doreka
Fraser, Michigan 48026
(By: Mr. Daniel J. Henry, Jr., Esq.)

Appearing on behalf of Defendant/Counter-Plaintiff and Third Party Plaintiff Christine Morrison

TABLE OF CONTENTS

WITNESS:	PAGE:
CHRISTOPHER AIELLO	
Direct Examination by Mr. Geyer	7
Re-cross Examination by Mr. Henry	27
JASON SPENCER	
Direct Examination by Mr. Henry	82
Cross-Examination by Mr. Geyer	102
PATRICK KEENAN	
Direct Examination by Mr. Henry	129
Voir Dire Examination by Mr. Geyer	137
Voir Dire Examination by Mr. Geyer	228

EXHIBITS

EXHIBIT	MARKED	IDENTIFIED
Exhibit 16	6	8
Exhibit 17	10	11
Exhibit 18	12	14
Exhibit 19	15	17
Exhibit 20	21	22
Exhibit Q	28	45
Exhibit R	61	69
Exhibit S	61	69
Exhibit T	90	92
Exhibit U	134	135
Exhibit V	202	233

[End of Page 3]

[Page 39]

MR. GEYER: Actually, that's a miscategorization, because on August the 19th of 1997, the judgment was approved by Judge Servitto, so that is not a proper question.

MR. McKINNEY: Well, it was certainly entered on. What do you mean, it was approved by her? She didn't sign it.

MR. GEYER: There was a motion filed for entry of the order. According to the docket sheet, the motion was granted.

MR. McKINNEY: Okay.

MR. GEYER: That's a misstatement to the Court. This was not a consent,

BY MR. McKINNEY:

Q. Then why did you sign it if that wasn't a consent?

A. Whatever a judge says, you do. If the judge says go sign it; sign it. If the judge says don't sign it; don't sign it. You know that. I do what the judge tells me to do.

Q. So you have a recollection the judge said you must sign this?

A. I didn't say that, you did.

Q. Did you submit any objections to the proposed

[End of Page 39]

[Page 226]

judge's signature. It says it's a true copy. If in fact it's a true copy, this one doesn't have any signatures on it. I'm talking about your tab number three, which is an Amended Consent Judgment of Annulment dated September 2 of '97.

Q. I will show you from Exhibit G itself, what is tab 3, the Judgment of September 2, 1997, and the last page in particular. That has a stamp of the Court?

A. Yes, it does.

Q. But no signatures of counsel?

A. Or of the parties.

Q. Yes. Let me have that book again, please.
And there is a subsequent amendment on September 8th?

A. Yes, it's --

MR. GEYER: Your Honor, for the purpose of to speed things up, I'll stipulate that the clients did not sign either amendment.

THE COURT: Okay.

MR. HENRY: Or the original.

MR. GEYER: Or the original.

MR. HENRY: Thank you, I'll accept the stipulation, then.

THE WITNESS: I can't ask a

[End of Page 226]

[Page 257]

CERTIFICATE

I do hereby certify that I have recorded stenographically the proceedings had and testimony taken in the above-entitled matter at the time and place hereinbefore set forth, and that the foregoing is a full, true and correct transcript of proceedings had in the above-entitled matter; and I do further certify that the foregoing transcript has been prepared by me or under my direction.

/s/ Tamara Fox
Tamara Fox
RPR, CSR-4281
TAPPERT COURT REPORTING SERVICES, INC
26600 Schoenherr Road
Warren, Michigan 48089
(586) 447-3800

[End of Page 257]