

23-7598

No. \_\_\_\_\_

\_\_\_\_\_  
IN THE

SUPREME COURT OF THE UNITED STATES  
\_\_\_\_\_

ARNAUD PARIS — PETITIONER  
(Your Name)

vs.

HEIDI MARIE BROWN — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

OREGON SUPREME COURT

\_\_\_\_\_  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

ARNAUD PARIS

\_\_\_\_\_  
(Your Name)

13 RUE FERDINAND DUVAL

\_\_\_\_\_  
(Address)

PARIS, FRANCE 75004

\_\_\_\_\_  
(City, State, Zip Code)

+33688283641

\_\_\_\_\_  
(Phone Number)

Supreme Court, U.S.  
FILED

MAY 28 2024

OFF...

## **QUESTION(S) PRESENTED**

Does a state court's decisions and actions violating both Federal Statutes (UCCJEA) and State Statutes in a custody dispute, which appears to favor an American parent over a French national based on the national origin of the parties, violate the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution by discriminating against a party due to their nationality, thereby necessitating review by this Honorable Supreme Court to ensure the uniform application of constitutional protections in family law cases involving international elements?

## LIST OF PARTIES

- [ ] All parties appear in the caption of the case on the cover page.
- [x] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

EVA LILIE PARIS (Child)

JULIETTE MANON PARIS (Child)

## RELATED CASES

RG 22/38514 in Paris Family Court, France

RG 23/37100 in Paris Family Court, France

22DR17285, in Jackson County Circuit Court, Oregon

23DR08269, in Jackson County Circuit Court, Oregon

S070246 in Oregon Supreme Court.

S070361 in Oregon Supreme Court.

1:23-CV-01960-MC in Oregon Federal District Court.

## TABLE OF CONTENTS

OPINIONS BELOW.....	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....	
STATEMENT OF THE CASE .....	
REASONS FOR GRANTING THE WRIT .....	
CONCLUSION.....	

## INDEX TO APPENDICES

APPENDIX A : <del>ORDER DENYING PETITION FOR PEREMPTORY OR ALTERNATIVE WRIT OF MANDAMUS</del> APPELLATE JUDGEMENT DENYING PREREMPTORY WRIT OF MANDAMUS
APPENDIX B : FRENCH JUDGMENT APRIL 21st, 2023
APPENDIX C : Status Quo Order - Signed by Judge Orr
APPENDIX D : Status Quo Ex-Parte Motion from Miss Brown
APPENDIX E : Hague Trial Excerpt December 7th, 2022
APPENDIX F : Excerpt from July 13th, 2023 Hearing in Case 22DR17285
APPENDIX G: July 19th 2022 Agreement made in France between Parties
APPENDIX H: OBJECTION TO STATUS QUO ORDER FILED ON JANUARY 10
APPENDIX I: COMPROMISING EMAILS PROVING FRAUD FROM MISS BROWN

## TABLE OF AUTHORITIES CITED

### CASES

### PAGE NUMBER

### STATUTES AND RULES

ORS 107.097

UCCJEA

International Principle of Committee

### OTHER

IN THE  
SUPREME COURT OF THE UNITED STATES  
  
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

**OPINIONS BELOW**

☐ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix \_\_\_\_\_ to the petition and is

- ☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

The opinion of the United States district court appears at Appendix \_\_\_\_\_ to the petition and is

- ☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

☒ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix \_\_\_\_\_ to the petition and is

- ☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☒ is unpublished.

The opinion of the \_\_\_\_\_ court appears at Appendix \_\_\_\_\_ to the petition and is

- ☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

## JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was \_\_\_\_\_.

☐ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. \_\_\_\_ A \_\_\_\_\_.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☒ For cases from **state courts**:

February 28th, 2024

The date on which the highest state court decided my case was ~~October 25th, 2023~~.  
A copy of that decision appears at Appendix A \_\_\_\_\_.

☐ A timely petition for rehearing was thereafter denied on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. \_\_\_\_ A \_\_\_\_\_.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

Equal Protection Clause of the Fourteenth Amendment to the United States Constitution

UCCJEA Statutes against obtaining contradicting/competing custodial determinations in the US.

## STATEMENT OF THE CASE

## STATEMENT OF THE CASE

The parties are unmarried parents of 9-year-old twins Juliette and Eva. Petitioner (“Mother”) is an American citizen. Respondent (“Father”) is both a French and American citizen. The children lived with the parties in California from 2015, not long after they were born, until August 2019. Between 2017 and 2019 the family visited France several times, staying in France for a total of 10 months over the course of those visits. In August 2019, the family moved to Paris, France, where they stayed for nearly three years, from August 2019 to July 29, 2022.

Mother wanted to relocate with the family from France to Oregon. Father ultimately opposed any permanent relocation away from France. Mother and Father engaged in mediation in France in July 2022 to resolve this conflict. Both parties had the benefit of legal counsel during the mediation.

On July 19, 2022, they entered into a written settlement agreement that would allow for the children to temporarily move with Mother to Oregon (“July Agreement”), which is attached hereto along with its certified English translation as Appendix G, incorporated herein. The July Agreement provided that Mother and the children could go to Oregon for the summer of 2022 and, if certain conditions were met, remain in Oregon for the 2022-2023 school year. If certain conditions pertaining to Father’s health were not met, then the family would return to France before the end of the 2022-2023 school year. Assuming the children stayed in Oregon through the 2022-23 school year, then they would then return to France summer of 2023.

Mother and the children left France for Oregon on or about July 29, 2022. Father remained in France and did not come to Oregon until August 19, 2022. Father had suspicions that Mother did not intend on returning the children to France as the July Agreement required. On or about September 3, 2022, while in Oregon, Father learned of Mother’s intention to violate the July Agreement by keeping the children in Oregon permanently. See attached Appendix I.

Upon that discovery Father returned to France on or about September 5, 2022 to prepare a Hague Action asking for the return of the children since Mother had clearly prepared a fraud to deceive Father and to commit custody forum shopping in Oregon where she was keeping the children refusing to return their passports. Father also prepared in France a local custody action in his jurisdiction in Paris which was filed on or about October 4, 2022, seeking custody of and parenting time with the children in their habitual residence in France. Mother was served on

October 11, 2022. On October 7, 2022, Mother filed the instant action, also seeking custody of and parenting time with the children. Father was not served until November 10, 2022. At the same time Mother filed her petition in this matter she also obtained an ex parte temporary protective order of restraint pursuant to ORS 107.097. See attached hereto as Appendix A and B and incorporated herein.

On January 13th of this year Father filed an objection to Petitioner's Ex Parte Motion and Declaration for Temporary Protective Order of Restraint (Pre-Judgment Status Quo – ORS 107.097) ("Motion"). See attached hereto as Appendix H and incorporated herein. In this objection, Father asked the Court to dismiss the Temporary Protective Order of Restraint that was signed by the Honorable Judge David J. Orr on October 11, 2022. Father made this request because the Court does not have sufficient grounds to institute a Status Quo order under ORS 107.097(6) and ORS 107.138(3). Most notably, the Court has no basis to find that Mother's residence was the children's usual place of residence at the time the motion for the temporary order was filed.

In paragraph two of her supporting declaration to this Status Quo order, Mother disguises the temporary move of the family to Ashland under the phraseology of "our family relocated to from Paris, France, to Ashland, Oregon, with the intent to make Ashland our permanent home." This is at best a misrepresentation of the truth or, at worst, an outright fabrication. "Our family" neither formally agreed nor determined any such thing.

Mother had spent 70 days in Oregon prior to filing her Motion for Status Quo Order. She moved into the residence located at 665 Leonard Street in Ashland, Oregon on or about August 30, 2022. This was 38 days prior to filing her Motion. Pursuant to ORS 107.097(6)(a) and ORS 107.138(3)(a), given that the girls did not reside in Mother's residence continuously and consecutively for three months, Mother's residence mathematically could not be the girls' usual place of residence. On January 13<sup>th</sup>, Father respectfully urged the Court to dismiss the Status Quo order for want of the requisite grounds for establishing the order. Mother's residence at the time of filing the Status Quo order was not the children's usual place of residence.

On October 20, 2022, Father filed a Petition for Return of Children Under the Hague Convention on the Civil Aspects of International Child Abduction ("Hague Petition") with the United States District Court, District of Oregon, Medford Division. He argued that Mother wrongfully removed the children from France because she intended to keep them in Oregon in

contravention of the July Agreement. The parties agreed to abate this matter while the Hague Petition was being litigated.

The federal district court in Oregon ruled on Father's Hague Petition on December 7, 2022. The court found that Paris, France was the children's habitual residence. The court described the children's connection to their home and community in France:

"The children were French citizens. They spoke fluent French. They attended French schools that had, you know, year-long programs at these academies for music and dance."

"The girls were involved in sports. They went to school and family excursions, regularly, throughout France. They had school-age friends and attended certainly visits with friends and birthday parties, those type of things. They had extended family and social supports in France, including a godfather."

"So I'm finding that the children were fully assimilated to France and an intensive fact inquiry points to the only conclusion that when the children left France for Oregon in July of [2022], France was their habitual residence."

The district court ultimately concluded that the children had not been wrongfully removed from France to the United States because, per the July Agreement, Father had consented to the children coming to Oregon. Furthermore, the children were not wrongfully retained here because, although Mother clearly expressed an intent to violate the July Agreement by not returning the children to France, she had not yet violated the July Agreement. Father's Hague petition was thus denied.

After the conclusion of the Hague Convention proceeding, this case came out of abatement. Father filed a Response to Mother's petition. The Response raised the issue that the court lacked subject matter jurisdiction. Father's response noted a custody proceeding that he had filed in France prior to the commencement of this case.

Father also filed an objection to the Status Quo order having been made on false pretenses and he requested a hearing on the Status Quo order on January 13<sup>th</sup> of this year. The Court was required to hold a hearing within 21 days of that date per the ORS 107.097 statute. But the court didn't offer any hearing regarding the Status Quo order objection within the 21 days and even disregarded this obligation till now as it never heard Father's arguments on the fact that Mother

committed perjury when she filed her motion for ex-parte Status Quo order as she was very well aware that a custody action had already been started in France and she lied about it in the declaration to the court.

On April 21, the French court issued a decision on custody, parenting time and child support. A copy of the French judgment and an official translation of the judgment are attached hereto as Appendix B and incorporated herein. Father registered the French judgment in the Jackson County court on or about May 9, 2023 under case number 23DR08269.

The French judgment explains that France has jurisdiction to make a custody determination because France is the children's habitual place of residence and where they lived for approximately three years prior to their departure in July 2022. It finds that the children's absence from France for the 2022-2023 school year is a temporary absence. Furthermore, it finds that Father lives in France. The French judgment divides the children's summer break from school in half and gives Father the first half of their break. Mother was awarded the second half of the summer break. She is required to return the children to France at the end of her summer parenting time, where the children are to remain in Father's care other than when Mother has her allotted parenting time.

On May 22<sup>nd</sup> of this year the court confirmed in an email that the Status Quo order objection would be heard on the hearing of May 25<sup>th</sup>. See attached hereto as Exhibit 07 and incorporated herein. The Court's clerk, Miss Tricia Allen, says in this email:

« Also after going through our emails the Motion for Status Quo filed back in January will also be addressed. »

During the hearing of May 25<sup>th</sup>, both Father's counsel and Father said on record that the court had the obligation to vacate that Status Quo order under ORS 107.097 for the following reasons:

- 1) The Status Quo order was issued without following Oregon Statutes (ORS 107.097)
- 2) ORS 107.097(2) authorizes the court to enter a temporary order of restraint **until custody or parenting time has been determined**. The French judgement which, at the date of the May 25<sup>th</sup> hearing, had been properly registered in Oregon (Case 23DR08269) and hadn't been objected by Mother, was in full force and effect in Oregon and constituted **a clear determination of custody and parenting time between the parties**. Therefore, by operation of law it led the Status Quo order to be terminated and dissolved under ORS 107.097.

3) The Status Quo order on June 16<sup>th</sup> will be in total conflict with the French Judgement that, as of the day of the hearing, had been registered in Oregon (Case 23DR08269) and was therefore in full force and effect.

Both Father's counsel and Father urged the court to tackle that Status Quo matter on the May 25<sup>th</sup> hearing as it was the Court's obligation to do so, and the Court clerk had clearly said it was going to be on the docket for that day. The Court refused to do so and the court was made aware by Father that the French Judgement had been properly registered and hadn't been objected by Mother; so at that point a clear determination of custody and parenting time between the parties had been made and the Court was made aware of it. Therefore, by operation of law this Status Quo order became unlawful, invalid, terminated, dissolved and void after that May 25<sup>th</sup> hearing.

But the court refused to vacate its Status Quo order after hearing this objection and hearing the argument that a determination had been made by the French Judgement that was in full force and effect in Oregon since Mother was served with its registration on May 10<sup>th</sup>. The court was told clearly on that May 25<sup>th</sup> hearing that by operations of law this rendered the Status Quo order void, terminated, dissolved, invalid and unlawful. The Court had an obligation to vacate this Status Quo order. Instead, the Court decided to take no action in order to block Father from returning the children to France and this indicated already clear judicial bias from the Jackson County court to favor Mother in these proceedings while it had no jurisdiction over the children.

This lack of impartiality from the Judge of the Jackson County circuit court was aggravated by a clear discrimination against French people when Judge Orr and Mother's counsel made racist jokes against the French and the French judicial system in open court on July 13<sup>th</sup> 2023. This improper, complicit and unethical behavior from both the circuit court Judge and Mother's counsel gave clear indication to Father that he would never obtain a fair trial in the Jackson County court and this is why Father tried to seek other relief in the US judicial system to have his most fundamental rights respected. Which lead to this petition for a Writ of Certiorari to this Honorable US Supreme Court.

## **REASONS FOR GRANTING THE PETITION**

## **REASONS FOR GRANTING THE PETITION**

**Reason 1:** The Status Quo hearing requested by Father never happened while Judge David ORR had an obligation to hear his objections within 21 days of the objection being filed back in January 2022. The Oregon Supreme Court was made aware of it in the Writ of Mandamus.

### **Supporting Facts for Reason 1:**

The Jackson County court failed to follow the Oregon Statutes ORS 107.097 that once a TPOR Ex-Parte is challenged it has the obligation to offer a hearing within three weeks:

*“The court shall make reasonable efforts to hold a hearing within 14 days and shall hold a hearing no later than 21 days after receipt of the request for the hearing. The court shall notify each party of the time, date and place of the hearing.”*

Yet to this day the Jackson Court still has not been properly offered any hearing for Father to challenge this Ex-Parte order obtained in bad faith by Mother. Mr. Paris’ counsel reminded the court on May 17th of this obligation for the court to expedite a hearing regarding this Status Quo order under ORS 107.097. As of August 1st, 2023, the court had failed its duty to deal with this case expeditiously. This was already a gross denial of due process and as a result the TPOR was invalid already for many months since Father challenged it last January just for that reason alone. (See attached Exhibits 04 and 05, Objection to TPOR).

**Reason 2:** The Status Quo order was obtained based on perjury, and, like the Jackson County circuit court, the Oregon Supreme Court was properly made aware of it and decided to ignore this fact to maintain an illegal and invalid Status Quo order and to create prejudice towards Father in violation of his civil rights to have due process in this matter.

NOTE: Committing perjury in an ex-parte TPOR is both a state and federal felony.

### **Supporting Facts for reason 2:**

The Status Quo order in this case was obtained based on perjury from Miss Brown. See page 5 of the attached transcript from the Hagues Federal proceedings from last December 2022 in

Eugene, Oregon (See Appendix E).). In this transcript, Miss Brown's lawyer says clearly that Miss Brown knew about the French custody case Father had filed on October 3rd, 2022 and Miss Brown filed her custody case in Oregon in response to it on October 7th, 2022 **including the motion for Status Quo order**. Yet in her declaration to obtain the Status Quo order, Miss Brown declared under perjury that she didn't know of any other custody proceedings about the children (See points 16 and 17 of the attached Status Quo motion from Miss Brown, Appendix D). This entire case was started based on perjury from Miss Brown which is a state and federal felony to the court and yet Judge ORR ignored deliberately all of this evidence. This proof and evidence of perjury had been presented to Judge ORR in a motion filed in April 2023 and in a second Motion filed with the court on November 16<sup>th</sup> 2023 untitled **MOTION TO DISMISS FOR DENIAL OF JURISDICTION FOR REASON OF CONDUCT (ORS 109.764)** that Judge ORR has refused to consider. Therefore, Judge ORR conducted another denial of due process against Father. Had Judge ORR read the motions regarding the validity of this Status Quo order that were properly in front of him he would have clearly seen that Mother lied and committed perjury to obtain her Status Quo order in the first place which invalidates it entirely Ab Initio with no prospective effects. A Status Quo order issued Ex-Parte must be done rigorously otherwise it's false. If this Status Quo order was obtained on a false basis and on perjury from Mother, then the Status Quo order is void or voidable.

Per the previous elements provided in this case we now know this Status Quo order was based on falsehood, it should be voided and set aside by Judge ORR as he was clearly made aware of the damages and prejudice that have been caused by this invalid and unlawful Status Quo order. Considering the immense immediate prejudice to Father, Judge ORR should have immediately remediated to this prejudice by vacating the Status Quo order when Father alerted on its invalidity, with no prospective effects. The Jackson County court didn't have jurisdiction and the statement from Petitioner was based on perjury which makes this Status Quo order also void Ab Initio. It was also void and voidable if this court wouldn't have considered this Status Quo order to be void Ab Initio.

Since the Status Quo had been obtained through perjury it had no validity and Judge ORR can't use it now to try to bring criminal prejudice upon Father based on that invalid order that Father would have supposedly violated. The fact that Judge ORR is now conducting "blackmail" against Father and the French Judicial system based on that illegal, dissolved by operation of law Status Quo order to bring back the children to Oregon is a clear proof that there is a total lack of respect for the French Judicial system, and it proves the lack of impartiality from Judge ORR and a clear denial of due process regarding Father in this matter.

**Reason 3:** Mocking French people and the French judicial system.

**Supporting Facts for Reason 3:**

1) Irregularities or misconduct have occurred in that Judge ORR has made comments in open court, during the course of the hearing on Father's motions to dismiss and his concurrent registration case, demonstrated bias and prejudice against Father as a French national. In making these comments, Judge ORR has demonstrated that he cannot be impartial and fair in deciding this matter about French nationals and custody determinations between the US and France.

Oregon Code of Judicial Conduct Rule 3.3 ("Impartiality and Fairness") provides as follows:

*(A) A judge shall uphold and apply the law and perform all duties of judicial office, including administrative duties, fairly, impartially, and without bias or prejudice.*

*(B) A judge shall not, in the performance of judicial duties, by words or conduct, manifest bias or prejudice, or engage in harassment, against parties, witnesses, lawyers, or others based on attributes including but not limited to, sex, gender identity, race, national origin, ethnicity, religion, sexual orientation, marital status, disability, age, socioeconomic status, or political affiliation and shall not permit court staff, court officials, or others subject to the judge's direction and control to do so.*

*(C) A judge shall not take any action or make any comment that a reasonable person would expect to impair the fairness of a matter pending or impending in any Oregon court.*

2) During the course of the hearing on Father's motions to dismiss (and concurrently, on Mother's objection to Father's registration of the French custody determination, case no.

23DR08269), Judge ORR made comments and engaged in conduct demonstrating bias and prejudice against Father based on his national origin, French nationals, French language and culture, and against the French judicial system.

3) The next day, July 13, Father called a business associate, Sébastien Natale as a witness on his behalf. Mr. Natale is French and testifying remotely from France. Mother's counsel, Mr. Murdoch, raised an objection regarding the court's ability to fairly administer the testimonial oath given that Mr. Natale was not subject to the trial court's authority. The court and Mr. Murdoch then engaged in a colloquy set forth in Appendix F, attached hereto and incorporated herein. In lines 6-9 of Appendix F, Judge ORR comments about what the penalty for perjury might be in France. After saying that the penalty may be "lashing" he says, "[m]aybe they put you in –" and he then motions as though his head and hands are placed in a pillory. Mr. Murdoch then comments that maybe the punishment would be not being allowed wine for a month, to which the court responds "right," agreeing with Mr. Murdoch's quip.

4) These events, especially when considered together, show bias and prejudice by Judge ORR against the French language, French nationals and the French judicial system. The suggestion that the French judicial system engages in barbaric practices like lashing or the use of a pillory manifests prejudice in both words and conduct. Similarly, Judge ORR's agreement with the idea that French people are so addicted to wine that having to abstain for a month could be punishment for perjury is gross stereotyping of all French nationals and French culture. It is also harassment against Father based on my national origin. Not only was it improper for Judge ORR to agree with Mr. Murdoch's comment, under Rule 3.3(B), above, Judge ORR had an obligation under the same rule to, minimally, admonish Mr. Murdoch for making such an offensive statement.

5) Judge ORR was being asked to recognize and enforce a French custody determination in Father's favor and against Mother, who is a Jackson County, Oregon, native. Judge ORR's view of the French judicial system, French people, and French language goes to the heart of the issues he must decide. If Judge ORR has no respect for the French judicial system, or French people, he cannot be fair, impartial or unbiased in his handling of this matter. Given what has transpired,

any reasonable person would conclude that Judge ORR is biased and prejudiced, and his conduct and comments have impaired the fairness of this proceeding, a violation of Judge ORR's duty under Rule 3.3(C), above.

6) Judge ORR's revelation of his bias and prejudice is remarkable, and in so doing has caused an irregularity in these proceedings that cannot be cured. For all of these reasons the court should have declare a mistrial and reassign this matter to another judge when a motion for mistrial was presented in front of the court by Father's counsel on August 3<sup>rd</sup> and yet the court refused to assign it to another judge and denied it summarily.

As a conclusion to this petition, the circuit court has been showing clear judicial bias against French nationals in this matter and it has been trying to keep the Status Quo order in place while it was obtained unlawfully and was rendered void and invalid by operation of law when the French Judgment was rendered and properly registered in Oregon on May 11th.

This Honorable Supreme Court should grant this petition because of the irreparable harm and prejudice caused by the Status Quo order, given the alleged perjury and jurisdictional issues not to mention the discrimination against French nationals that took place in a district court. Petitioner respectfully asks the Supreme Court to void the Status Quo order and to consider the damages caused by it which could lead to criminal consequences that no appeal could resolve timely. Petitioner also requests a mistrial for the related case, given the circumstances.

The Oregon court's decisions conflict with the UCCJEA and international custody norms, especially the principle of Committee when two different courts are trying to establish custody upon the same children. The first to file and the first court to judgment has priority by the principle of Committee and therefore the Oregon court should have dismissed its case.

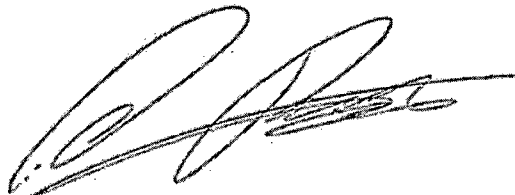
**This case is of National Importance in the matter of International Custody Disputes.** This case presents significant legal questions on international custody disputes, which are of national interest and require clarification by the Supreme Court.

## CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

ARNAUD PARIS



May 28th, 2024

Date: ~~January 23rd, 2024~~

~~Sent by UPS on the same day to be delivered to the US Supreme Court within 3 days~~

Hand delivery by process server

No. \_\_\_\_\_

\_\_\_\_\_  
IN THE  
SUPREME COURT OF THE UNITED STATES  
\_\_\_\_\_

ARNAUD PARIS — PETITIONER  
(Your Name)

VS.

HEIDI MARIE BROWN — RESPONDENT(S)

**PROOF OF SERVICE**

I, ARNAUD PARIS, do swear or declare that on this date, ~~January 23rd~~ May 28th, 20 24, as required by Supreme Court Rule 29 I have served the enclosed ~~MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS~~ and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

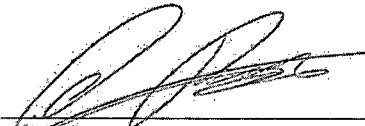
~~HEIDI MARIE BROWN, 2200 Abbott Ave, Ashland Oregon 97520~~

George W. Kelly, 303 W 10th Ave, Eugene, OR 97401

HEIDI MARIE BROWN, 2256 Abbott Ave, Ashland, OR 97520

I declare under penalty of perjury that the foregoing is true and correct.

Executed on ~~January 23rd~~ May 28th, 2024

  
(Signature)