

FILED  
IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI  
LAFAYETTE COUNTY

2020 NOV 25 PM 3:09

Phyllis Marie Crowder-Kester

Plaintiff/Petitioner

Vs

Cause # CV2016-422W

Matthew Oliver Reardon

Defendant/Respondent/Movant

**Petition for Permission to Interlocutory Appeal to the Mississippi Supreme Court**

Pursuant to Rule 5 of the Mississippi Rules for Appellate Procedure (MRAP), Matthew Reardon, The Respondent/Defendant in the above captioned cause files this his petition for permission to Interlocutory Appeal to the Mississippi Supreme Court. Movant states that this petition is filed in good timing and most certainly with good merit based on grounds for which relief through interlocutory appeal may be sought. Movant would affirm that he has continued to sustain repetitive injuries at the baseless, frivolous, and vindictive hands of the petitioner, the petitioner's legal counsel, along with the State of Mississippi. Movant states that he each motion brought before this court has been prejudicially ignored with preferential treatment shown to the petitioner in this cause the entire time despite the fact that petitioner has had a history of filing false reports and this very cause will show the furtherance of petitioner's continued behavior which is not only morally incomprehensible, but in fact rises to the level of criminal conduct by flagrant and uncaring violations of MS 97-7-10 "Fraudulent Statements and Representations" along with MS Code Ann 97-1-1 "Conspiracy" which the State of Mississippi has refused to acknowledge, condemn, and deter despite petitioner meeting literally every criteria of the statute needed for indictment by a Grand Jury. Yet through what would easily appear to be culpable negligence at the hands of state actors acting under the color of law, she has continued to get away with the intentional infliction of injuries upon the respondent/movant and this court is further feeding into it by immorally changing a standing order when absolutely no evidence was produced and court proceedings delayed.

Movant further demonstrates the preferential treatment shown through his filing of a Motion to Dismiss, Or, Alternative, to Transfer Venue filed 11/16/2020 on the basis that venue, while jurisdictionally

is proper, is in fact improper in the Chancery Court of Lafayette County, Mississippi due to reasons of constitutional law, equity sought in counterclaims by the respondent due to the injuries sustained, zero evidence produced upfront as a way of justifying nine months of contempt in violating a visitation order, and a jury demand by respondent/movant for these reasons stated and stray away from the constitutional norm and lack of acknowledgment by this court on any of the motions/petitions filed with this court. This motion is attached to this filing as "EXHIBIT A". It would most certainly appear that any response or forward motion brought by movant is destined to fall upon blind eyes and deaf ears, despite all evidence almost certainly warranting the dismissal of petitioner's cause. Petitioner along with this court moved on their own to enter an order of supervised visitation and appointment of Guardian Ad Litem which was drafted by petitioner's attorney, accepted, signed by the judge, and filed by this court UNSIGNED by the movant despite his "motion to dismiss or transfer" being open, unanswered, and ignored by this court. Order filed adjudged without movants signature is attached as EXHIBIT B.

Despite serious issues of law, ethics, and criminal wrongdoing raised and alleged, none of this mattered. It is entirely the opinion of the movant that influence along with ongoing pending litigation over extreme civil rights violations committed through officials of Lafayette County have in turn created what movant cites as a "Constitutional Crisis" by way of trying to "FIX" a desirable outcome through the initiation of legal frivolous and undeserving proceedings done with ill intention and further using the pressure of keeping movant's minor child from him to make him "cave on a matter". This was precisely the case in May of 2017 and Movant has been consistent in stating the same claims about how his minor child was used as a manipulation tool of the courts by the minor child's mother for her own personal gain whom by ways of collusion and criminal conspiracy plotted and in many ways were successful in eliminating or reducing the legal liability stemming from the actions of certain individuals and Officials in Lafayette County Mississippi whom will be named in a separate court filing. The fact that this court allows her to carry on despite her claims raised as complete lies and in light of her having a history of pathological lying through the false reporting of crimes is an absolute shame and one that should question the validity of other rulings or if this was simply isolated. While movant has continued to gain more legal knowledge

especially in the composing of briefs, motions, petitions, and responses which most certainly will fair to his advantage in the future as an attorney should he choose to pursue that, true justice is nowhere in sight.

Movant asserts and affirms through multiple recent examples including this cause that there has been a clearly shown lack of adherence and care to the equal protections under the laws which are afforded to all citizens under the Fourteenth Amendment to The United States Constitution. A system designed to provide due process and one that should stay uninfluenceable and non-biased would appear to have drifted away from acceptable norms that would garner and keep the trust of citizens now is clouded with uncertainty, all appearances of influence controlled, and quite frankly has gone on tilt, continuously spiraling further and further out of control. The first question movant would pose is what good are laws and why were laws instituted if they can be so bludgeoned and blatantly abused, even when such abuse is brought to the attention of those tasked with upholding and enforcing such laws? Does the State of Mississippi actually condone this type of behavior and even more so do they condone the culpably negligent actors whom are fully aware of it and allow the continuation of such, despite the damage continuously inflicted by the victim whom has exhausted remedies in seeking immediate relief from the Government whom is tasked with protecting its citizens by way of providing equal protections under its law. Our Country has operated under the policy in name of Innocent until Proven Guilty in a court of law. I say in name, because it's something that exists clearly just to sound good and give off false hope to anyone suffering at the hands of a completely flawed criminal justice system when in fact all too often the accused is looked at and treated as guilty until they prove their innocence. That fact is made blatantly clear in this cause, and it couldn't be any clearer. After two scheduled hearings the petitioner has not produced one single strand of evidence which would even suggest that she has a valid, non-frivolous claim and in fact every motion and response filed by respondent/movant has stated in fact very serious claims of petitioner having a history of making false reports and that movant was advised multiple times that the petitioner was "lying through her teeth" and that they would never assert anything of the such which petitioner has asserted now on three separately filed documents filed with this court under signed and sworn affidavit. Has this court even one time considered an obvious most certain guarantee that law enforcement would have been involved had any

of petitioner's claims been true. There would have been some report by the proper agency and authorities brought before this court and shown up front as grounds to keep a father from his normal scheduled visitation with his child for 10 months now. Even more concerning is the fact that movant was barred from even seeing his child by the petitioner in this cause despite her being in receipt of \$600 in child support paid every month further aggrieving financial hardship on movant's now family of five due to the amount being far outside of allowable guidelines established but was agreed to 4 years ago when movant's financial situation was different.

Do laws no longer matter or is there a second set of laws that apply to certain individuals, because if so, the movant sure never got the memo. There was a time where the fear of receiving a hefty punishment by incarceration for perjurious statements made and especially those made under affidavit. This kept moral, legal, and judicial integrity in check. Yet despite each signed, SWORN affidavit given by movant/respondent, this court has failed to acknowledge and clearly overlooked including its details going unread. Otherwise a court tasked with looking out for the best interest of the child would never make the ruling that it did further inflicting injuries to movant by way of his child and inflicting injuries to the child by allowing her mother to forcefully keep the child from her loving and caring father whom has met every obligation including a psychological evaluation ordered by this court in 2017 which showed that movant was mentally sound, stable, and a caring parent whom should have his child. Yet this court continuously controversially has sided with petitioner and further clearly condoned and supported her petitions which were brought solely in malice and retaliation for petitioner getting charged with filing a false police report. The movant acknowledges that a Chancellor has a good bit of leeway and discretion, however movant is of the upmost opinion that this trial court has completely abused its discretion and authority by allowing the petitioner and her legal counsel to dictate everything in this cause, further aggrieving intentionally casted damage upon movant. Petitioner first fast-filed her petition at the end of August due to trial for the false reporting of a crime being in September. All of this after illegally and immorally holding the minor child from her father for 7 months and in doing so being in gross contempt of the standing visitation order. Movant would further show that all of this including documented events over the past 4 years would

undoubtedly paint the picture of the petitioner being mentally unstable through numerous admissions that she has made, with the end goal since the beginning being to permanently remove the father of her child from her child's life. This was made crystal clear through not only her heinous and immoral false accusations made and proven false, but this proceeding where she is trying to dictate outcomes and put movant on an undeserving supervised visitation to help justify her cooked up lies and on-going criminal conspiracy which this court is not only condoning, but playing a material part in. It should be very easy for this court to see that the end goal is to label a caring and deserving father as uncaring and undeserving, and this is even clearer to see when assessing an email that movant received by petitioner's other legal counsel for her criminal matter, in which the adjudged sentence just vanished prior to appeal at the hands of abhorrent lies and collusion. Email by prior attorney will be attached to this petition as evidence and labeled EXHIBIT C and details surrounding the further enabling of this issue through complete neglect is entered as EXHIBIT D and is publicly accessible through the web address BANISHTHIS.COM.

This type morally incomprehensible behavior is one that will almost certainly lead to the decay and destruction of our society and most certainly the removal of the expectation of equality, fairness, and protections under the laws that are supposed to be guaranteed to all United States Citizens. As a Marine Corps Veteran, Movant harshly condemns this abominable treatment, and would further state that this complete usurping and allowing of the other party to dictate conditions and orders contrary to her being in gross and willful contempt of the standing order prior to this is unfortunately yet another example of the type of sub-par treatment given to those who dedicate their lives to the Defense of the United States of America and its constitution by the clear usurping unchecked power granted to the government by its own citizens which is then manipulated, mutilated and molested.

#### **WHEREFORE ALL PREMISES CONSIDERED**

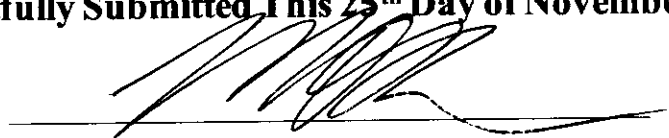
Movant submits his grievances against this court, the opposing party, and the State of Mississippi for their continued allowance and condoning of this constitutional crisis and intentional infliction of injury on

America and its constitution by the clear usurping unchecked power granted to the government by its own citizens which is then manipulated, mutilated and molested.

**WHEREFORE ALL PREMISES CONSIDERED**

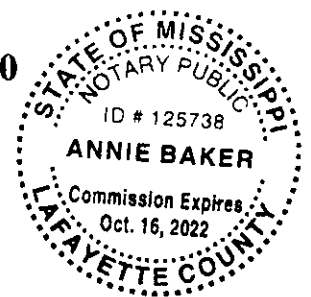
Movant submits his grievances against this court, the opposing party, and the State of Mississippi for their continued allowance and condoning of this constitutional crisis and intentional infliction of injury on movant and with everything stated hereby requests this court to answer movants motion to “**dismiss or in the alternative to transfer to circuit court**”. If this court will not dismiss with prejudice, then Movant requests the written permission of this court to take leave from this court to appeal this decision via Interlocutory Appeal to the Mississippi Supreme Court due to further constitutional rights and freedoms attacked and further called into question. Movant believes given the aforementioned facts stated and through jurisprudence that Dismissal of the Petitioner’s original petition most certainly is warranted if they cannot immediately produce any credible evidence to substantiate their claim. Movant would formally request that the court read his filed motions and petition done under sworn affidavit and movant asserts that his statements have been given freely and voluntarily, given under penalty of perjury for false statements, and movant further asserts that he has provided all factual knowledge to the best of his ability. One of the parties clearly is in gross, willful violation of perjury movant would show that not immediately dismissing and further holding a hearing to hold the perjurious party accountable would be contradictive to all morals and integrity of this court and other courts throughout this state. This type of criminal nonsense and initiation of false legal proceedings must be stopped, and it starts in the courts. Movant also prays for any other special or general relief to which he may be entitled.

**Respectfully Submitted This 25<sup>th</sup> Day of November 2020**



Matthew Reardon | Respondent/Defendant/Movant

Notary: Annie Baker Date: Nov. 25, 2020



FILED  
STATE OF MISSISSIPPI  
LAFAYETTE COUNTY  
IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI  
2020 NOV 16 PM 3:27

Phyllis Marie Crowder-Kester

Plaintiff/Petitioner

Vs

BY TJ

Cause # CV2016-422W

Matthew Reardon

Defendant/Respondent

**MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

Pursuant to Miss. R. Civ. P. 12(b)(3), Matthew Reardon, The Respondent/Defendant in the above captioned cause files this Motion to Dismiss, Or, Alternative, to Transfer Venue on the basis that venue is improper in the Chancery Court of Lafayette County, Mississippi due to reasons of constitutional law, equity sought by respondent, and a jury demand by respondent/movant for these reasons stated. Due to other legal matters involving Lafayette County which are ongoing in which movant has asserted and continues to assert influence by opposing council along with select others prejudicing both prior as well as ongoing legal matters- which includes the opposing council in this matter, Mona Pittman and Christi McCoy who was in attendance during today's proceedings, and who represents the plaintiff as defense council in a separate matter. Movant asserts that he feels he cannot receive a fair ruling and one congruent with the constitution without a jury trial after this court ignored the statutory requirement placed upon the court of innocence until proven guilty. Movant feels he brought forth the evidence required to cast complete doubt on the plaintiff's claims especially being they haven't produced one sliver of evidence to back the baseless, slanderous, and defaming claims they made against Defendant and his wife. Nonetheless, as like the prior legal matter three years ago which is currently on appeal to the Supreme Court, the movant here was ultimately looked at in the eyes of this court as guilty until he could prove himself and his wife innocent in which movant had the evidence of and detailed out in his motions and petitions filed which include 3 separate calls with Department of Childs Services where they state

Exhibit X

the plaintiff in this cause is lying and in gross contempt. Plaintiff in this cause recently pled out to filing a false report of Rape on the Defendant and has a history of pathological lying. Therefore based on the clear inconsistencies shown during today's hearing, movant asserts this to be a matter he seeks out a trial by a jury of his peers and further asserts that a trial which would show the plaintiff bringing false, perjuring claims in an ongoing criminal conspiracy against the Defendant would negate any need for a Guardian Ad Litem and potentially tainted result for Defendant being that Guardian Ad Litem was at first named by Plaintiff's Attorney whom is at the center of pending litigation due to what the Defendant in this cause asserts as direct involvement in his criminal framing along with a high preponderance of her playing a significant part in his incarceration awaiting trial denying him rights of due process and certain constitutional rights. As a USMC Veteran, Movant strongly condemns this type of treatment, and moves for treatment guaranteed by due process under and congruent with the Constitution. Respondent states that other pending legal matters he is initiating against the adverse party including intentional torts of civil wrongdoing that which movant would assert meets and exceeds the criteria of organized crime and conspiracy that has been committed on behalf of the plaintiff in this cause. As such, movant doesn't feel he is receiving proper care to the issue at hand which has already shown to be prejudicial to movant and raising real constitutional concerns which movant feels should be heard and decided by trial and jury of his peers, or on oral argument to the Mississippi Supreme Court on interlocutory appeal should movant's motion to dismiss order entered by this court or transfer venue to circuit court not be granted.

The Complaint identifies the Defendant as an adult resident citizen of Lafayette County. This is correct. Thus, is domiciled in Lafayette County. The cause of action involves the alleged abuse of a minor child in which plaintiff's claim was closed out unsubstantiated by Department of Child Services, Led to no notification of law enforcement which almost certainly would have happened leading in turn to an investigation which quite frankly was not the case, further the plaintiff has gone in gross contempt of the



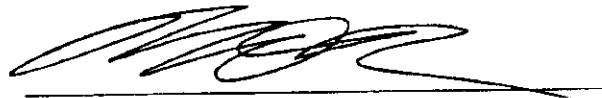
established visitation order established by this court for 9 months not allowing communication or scheduled visitation with the respondent despite his continued child support obligations of \$600 per month being rendered to the plaintiff every month. All of this was done in retaliation of the plaintiff being prosecuted by Olive Branch Police Department for her knowingly false reporting and further conspired reporting that the respondent/movant had raped her which couldn't have been further from the truth. Such accusations on both the respondent/movant as well as his spouse have resulted in emotional trauma due to knowingly false, slanderous, and defaming statements and accusations made, and has further created conflict and marital issues between the respondent and his spouse, as such it is the movant and his spouse's intention to immediately bring a cause for action for Slander, Defamation of Character, Libel, Tortious Interference, Abuse of Process, Malicious Prosecution, and Civil Conspiracy against the Plaintiff in this cause and her spouse, along with bringing appropriate legal remedies against the plaintiff's counsel for knowingly playing a part in the ongoing conspiracy and intentional criminal framing of the respondent for the part that she so carelessly played.

WHEREFORE, Movant Matthew Reardon respectfully requests this Court to dismiss the action brought forth by the plaintiff due to absolutely ZERO evidence produced at the SECOND scheduled hearing to back their baseless claims especially after 9 months of being in contempt of this court's child visitation schedule. Movant further respectfully requests for this court to rescind its order entered 11/16/2020, or, in the alternative, to transfer this action to the Circuit Court of Lafayette County based on improper venue due to the amount of equity sought in counterclaim, the seriousness of the nature and harm steadily aggrieved by the movant and his spouse from such, and a jury demand by movant.

Movant further states his full intent to appeal by interlocutory appeal to the Mississippi Supreme Court should this motion not be heard and denied. Movant prays for any additional relief the Court may deem proper in such motion.

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Respectfully Submitted This 16<sup>th</sup> Day of November 2020



Matthew Reardon | Respondant/Defendant/Movant

FILED  
STATE OF MISSISSIPPI  
LAFAYETTE COUNTY  
IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI  
2020 NOV 19 AM 10:38

PHYLLIS MARIE CROWDER-KESTER  
VS.  
MATTHEW OLIVER REARDON

PLAINTIFF  
CAUSE NO. CV2016-422(W)  
DEFENDANT

TS

**TEMPORARY ORDER**

THIS MATTER was heard on the Petition for Modification and Other Relief and the Motion for Appointment of Guardian Ad Litem filed by Plaintiff on November 16, 2020, and the Court having heard testimony from the parties hereby orders as follows:

1. That this matter is continued to January 28, 2021 at the Lafayette County Chancery Building beginning at 9:30 a.m. or until such time as the same may be heard.

2. That until this matter is heard on the above referenced date, Matthew Oliver Reardon may exercise supervised visitation with the parties' minor child from 9:00 a.m. – 5:00 p.m. on Saturdays and Sundays, beginning Saturday, November 28<sup>th</sup> from 9:00 a.m. – 5:00 p.m. and Sunday, November 29<sup>th</sup> from 9:00 a.m. – 5:00 p.m. and every other Saturday and Sunday from 9:00 p.m. – 5:00 p.m. thereafter. The following persons are authorized by this Court to supervise said visitation:

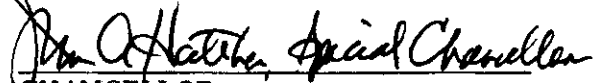
- a. Wes Gilmore;
- b. Elizabeth Reardon;
- c. Amanda Wells;
- d. Trish Burke; and/or
- e. Michelle Burke.

3. That the monthly child support amount ordered to be paid by Matthew Oliver Reardon is hereby reduced from \$600.00 per month to \$400.00 per month beginning December 1, 2020.

Exhibit B

4. That the Honorable Lori Solinger is hereby appointed as Guardian Ad Litem as will be outlined in a separate Order by this Court.

SO ORDERED, on this the 19<sup>th</sup> day of November, 2020.

  
CHANCELLOR

Prepared by:



Mona T. Pittman (MSB # 9754)  
Counsel for Plaintiff  
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[mona@panola.com](mailto:mona@panola.com)

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Matthew Reardon  
Pro Se Defendant

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**When Freedom is Outlawed, Only The Outlaws Will Be Free**  
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=====  
From : cmccoy@nmrls.com<cmccoy@nmrls.com>  
To : "matt@ridingwiththeoutlaw.com"<matt@ridingwiththeoutlaw.com>  
Date : Mon, 16 Nov 2020 16:53:20 -0600  
Subject : Resolution of issues  
=====

Hi Matt.

I want to clarify something. I had nothing to do with the chancery filing in August and my role was totally separate from that chancery matter. Any assertion that I used chancery for some benefit in Olive Branch is incorrect. I am not sure what your theory is but I want to be clear – I had nothing to do with that.

I DID tell the Court there was a chancery filing and I explained why that was important to the case. Maybe you couldn't hear me and I know you have asked the Courts to explain our position so I will try.

You and Liz have a child. All of these allegations and court hearings are pushing yall further and further apart as parents. I told Judge Shumake she wanted to resolve the charges because yall have a child together and were going to chancery court to deal with that child. Liz did not want to put either of yall through the anger and pain of a trial.

I supported that move in an effort to get that behind yall and focus on the child.

At this point I don't know if it is possible for yall to co parent. I would hope so but so much water under the bridge. . .

I serve as a guardian ad litem in tons of cases and I have rarely seen a couple so at odds with one another. And I am not pointing fingers. It is what it is and there is plenty of blame to go around.

I know child support has been a major issue for you and I am glad Judge Whitwell reduced it temporarily if that will help the situation. If Liz dropped all child support would you agree to limited visitation? It might be in Lydia's best interest for the time being given what you are dealing with.

You have a lot on your plate right now and honestly, it seems as if your life is a pressure cooker. Again, not a judgment, just the facts. I do wish you had counsel to at least give you some guidance if not represent you. And my job with the Victims Assistance Program does not prevent you from having an attorney from Legal Services. It is just that your case is not acceptable under current guidelines.

Also – Lori Solinger – she is hardcore for the child and the best of the best. She will call it exactly as she sees it. Trust me – she has ruled against my clients more than once and while I didn't LIKE her recommendation, it was the correct one. You will be fine with her. Just give her a chance.

Please consider how the scenarios with Liz and Lydia can be resolved for everyone's best interest. I thought I would shoot you an email. I have not discussed with Liz. I am just working on another guardian ad litem case this afternoon and it made me think of yall. You and Liz are grownups. Surely yall can come up with a way to resolve this part of the chaos.

I do not represent Liz in chancery – I am there in the role as an advocate only. That said, if I can help yall two resolve this, I will do my best.

Christi McCoy

Exhibit C

Exhibit D

BANISHTHIS.COM

video  Evidence