

IN THE CIRCUIT COURT OF FAULKNER COUNTY, ARKANSAS

BENJAMIN B. SIMPSON

PLAINTIFF

VS.

23DR-19-1084

JUSTINE SIMPSON

DEFENDANT

**RESPONSE TO MOTION TO SET ASIDE DECEMBER 19, 2019 ORDER**

Comes now Plaintiff, Benjamin Simpson, by and through his attorney, Victor D. “Trey” Wright, III, and for his Response to Motion to Set Aside December 19, 2019 Order, does state as follows:

1. All actions by this Court in this matter were correct and necessary under the law.
2. Defendant Justine Simpson has willfully evaded service and has willfully removed the children from the jurisdiction of the Court, and has continued to defy a court order for a period of two months.
3. Defendant Justine Simpson, through the actions of her father and through her own actions, should not be allowed to have an order set aside due to her inaction and her refusal to engage in the legal process.

WHEREFORE, Plaintiff prays the motion of the Defendant be dismissed and denied, for his costs and fees and all other relief to which he is entitled.

Respectfully submitted,

**/s/ Victor D. “Trey” Wright III**

Victor D. “Trey” Wright, III  
Wright Law Firm  
111 Center Street, Suite 1200  
Little Rock, AR

CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of the above and foregoing to the following this day of filing in accordance with the Arkansas Rules of Civil Procedure.

Jennifer Glover  
Natural State Law  
900 S. Shackleford, Suite 705  
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*/s/ Victor D. "Trey" Wright III*  
Victor D. "Trey" Wright, III