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IN THE IOWA DISTRICT COURT IN AND FOR JEFFERSON COUNTY

In re the Marriage of Frederick J. Shaddock and Oksana S. Shaddock

Upon the Petition of	)	
	)	
FREDERICK J. SHADDOCK,	)	Case No. CDCV402015
	)	
Petitioner,	)	
	)	
and Concerning	)	RESPONSE RE
	)	MOTION TO CONTINUE
OKSANA SHEMET SHADDOCK,	)	
	)	
Respondent.	)	

Respondent, by and through counsel, provides the following response to Petitioner's motion of February 24, 2025:

1. Petitioner filed a Mutual Motion for Extension of Time on February 24, 2025. In Petitioner's motion, he essentially seeks a continuance to the review hearing scheduled in this matter on March 3.

2. Petitioner provided numerous reasons for a continuance of the review hearing, including citing several substantive disagreements between the parties that could and should be determined by the court following trial in this matter. Respondent does not agree that material differences between the parties regarding ultimate issues of this cause require a continuance to the review hearing on March 3.

3. Respondent does not object to Petitioner's request for a continuance

of the review hearing. Respondent continues to explore opportunities for dismissing the divorce and preserving the marriage of the parties. A continuance would allow the parties additional time for such discussions without requiring the court to designate a date for trial that may not be necessary, and that would require the parties to begin trial preparation in addition to any discussion of reconciliation.

4. Respondent further joins in Petitioner's motion insofar as Petitioner requests that counsel and the parties be permitted to participate in the review hearing by Zoom or other teleconference. At this time Respondent is residing in Washington, D.C., and is unsure when she may return to Jefferson County. In addition, the undersigned has professional obligations in Johnson County Juvenile Court before and after the scheduled review hearing, making travel to Jefferson County on March 3 practically infeasible. Respondent therefore moves the court to permit the remote participation in the review hearing by the parties and counsel regardless of whether the court grants Petitioner's motion for continuance.

WHEREFORE Respondent joins in Petitioner's motion to continue the status conference in this matter; and joins in Petitioner's request that the parties and their counsel be permitted to participate in the status conference remotely regardless of whether a continuance is granted.

JOSEPH C. PAVELICH

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NOTICE OF ELECTRONIC FILING

The undersigned certifies that the foregoing instrument was electronically filed and served, through the EDMS system or mail, upon all parties as they may respectively appear on the date of filing.

By: /s/ Joseph C. Pavelich