

EDIT FIRST SENT TO MINDY 11/29/22 AT 12:55PM

Subject: Re: Current Redlined Drafts
Date: Tuesday, November 29, 2022 at 12:55:15 PM Central Standard Time
From: Brad Payne
To: Mindy Pillow
CC: kkmilbrath@gmail.com, Diane Woods, Pillow Hayes Admin, Karen Griffin
Attachments: image001.png, Milbrath Consent Final Permanent Parenting Plan 11.29.2022 BP.docx

I have attached red lines to the parenting plan. I do have more just to remove ambiguity from inevitable situations, wanted to allow Kim's edits to get incorporated.

MAJOR DECISIONS

Major decisions regarding each child shall be discussed between the parents in an attempt to make a mutual decision. If the parents are unable to agree then the final decision shall be made as follows:

Religious decisions – Each parent will worship with the children, as they deem fit, during their parenting time.

Educational decisions – Mother will have final decision making if the parties cannot agree; however, no later than November 1 of each child's fifth grade year, if he wishes to do so, Father will propose the names of three educational consultants to Mother and Mother will select one by no later than November 15. The parents will provide written releases to the selected consultant in order that he or she may speak with the children's schools and obtain their educational and testing records. The parents will meet with the consultant no later than January 15 of each child's fifth grade year and obtain his or her advice as to which middle school program would be the best choice for each child. After consultation and discussion, and only if they cannot reach consensus, Mother will choose the public middle school the children will attend.

Comments:

- Mindy Pillow Deleted: January 15
- Mindy Pillow Deleted:
- Mindy Pillow Deleted: February 1
- Mindy Pillow Deleted: April 1
- Mindy Pillow Deleted: and the high school

FULL DAY W/ NO RESPONSE FROM MINDY

Subject: Re: Current Redlined Drafts
Date: Wednesday, November 30, 2022 at 2:59:01 PM Central Standard Time
From: Brad Payne
To: Mindy Pillow
CC: kkmilbrath@gmail.com, Diane Woods, Pillow Hayes Admin, Karen Griffin
Attachments: image001.png

Hi Mindy –
Just wanted to check in as I haven't seen anything from you today.

Can you please send me the CSW, so I can final review and sign?

The Dec. 1 payment is already processing for the previous \$684.50, so there will be a second pmt for \$315.50 on the same day.

Thanks

NEW URGENCY FROM KIM AND MINDY BOTH

Subject: Re: Timeline for your review and return?
Date: Wednesday, November 30, 2022 at 9:15:43 PM Central Standard Time
From: Kim Milbrath
To: Mindy Pillow
CC: Brad Payne, Pillow Hayes Admin, Diane Woods, Karen Griffin
Attachments: image001.png, image001.png

Brad can you please expedite this so we can get everything finalized?

Thank you so much!

On Wed, Nov 30, 2022, 4:40 PM Mindy Pillow <mindy@pillowhayes.com> wrote:

Can you give me an approximate idea of when you will have your edits to the Consent Final Order (sent to you on Monday 11.28.2022 at 4:22 pm) the CSA and CSW (sent to you on Tuesday 11.29.2022 at 8:41 am after our email exchange regarding duration of child support) and the PP (latest version sent to you today 11.30.2022 at 5:08 pm with your edits and Kim's edits)?

STILL IN DOC W/COMMENTS BACK AND FORTH ON 12/1/22

Subject: Re: Timeline for your review and return?
Date: Thursday, December 1, 2022 at 11:26:16 PM Central Standard Time
From: Brad Payne
To: Mindy Pillow
CC: Diane Woods, Karen Griffin, Pillow Hayes Admin, Kim Milbrath
Attachments: Milbrath Consent Final Permanent Parenting Plan 12.1.2022 Edits both parents.docx

Minor changes to PP re: some scheduling windows and communication. Don't think anything should be objectionable.

MAJOR DECISIONS

Major decisions regarding each child shall be discussed between the parents in an attempt to make a mutual decision. If the parents are unable to agree then the final decision shall be made as follows:

Religious decisions – Each parent will worship with the children, as they deem fit, during their parenting time.

Educational decisions – Mother will have final decision making if the parties cannot agree; however, no later than November 1 of each child's fifth grade year, if he wishes to do so, Father will propose the names of three educational consultants to Mother and Mother will select one by no later than October 15. The parents will provide written releases to the selected consultant in order that he or she may speak with the children's schools and obtain their educational and testing records. The parents will meet with the consultant no later than January 15 of each child's fifth grade year and obtain his or her advice as to which middle school program would be the best choice for each child. After consultation and discussion, and only if they cannot reach consensus, Mother will choose the public middle school the children will attend.

Health-related decisions – By January 1, 2023 Mother will select three pediatricians/dentists/therapists who are equidistant between the two households who accept the parents' health insurance. Father will select one practitioner from each of these disciplines for the children by January 15, 2023. Thereafter, the Father will have final decision making if the parties cannot agree as to Oliver's medical, dental, and psychological treatment and the Mother will have final decision making if the parties cannot agree as to Rowan's medical, dental, and psychological treatment.

Extracurricular decisions – Both parents will register and pay for a family membership at the Blaisdell YMCA located in Minneapolis, MN (it is halfway between the parties' respective homes) by December 15, 2022. Father will have final decision making over extracurricular activities for both children and the children will be enrolled in at least one, but no more than two, extracurricular activities at Blaisdell YMCA during the fall, winter, spring, and summer seasons, beginning with the winter season. Any additional activities not available at the Blaisdell YMCA can be suggested by either parent but must have agreement from both parents to bring the children to those activities unless those activities are on only one parent's time and it does not interfere with the other parent's time as noted below. The parties have previously agreed that the Children will continue with their swimming lessons at Foss in St Paul. Each parent will bring the children to their extracurricular activities during their respective parenting times. If the Father does not enroll the children in at least one activity for each season through

Comments:

- Mindy Pillow Deleted:** January 15
- Mindy Pillow Deleted:**
- Brad Payne Deleted:** November
- Mindy Pillow Deleted:** February 1
- Mindy Pillow Deleted:** April 1
- Mindy Pillow Deleted:** and the high school
- Brad Payne Formatted:** Line spacing: At least 16 pt. No widow/orphan control. Don't adjust space between Latin and Asian text. Don't adjust space between Asian text and numbers
- Mindy Pillow Formatted:** Not Highlight
- Brad Payne:** most schools (especially if you are looking at any private schools) have application deadlines starting in late February/ early march so we need to move that deadline sooner.
- Mindy Pillow:** Private school was my example. Not kims; we just need a better timeline.
- Brad Payne:** Jan 15th would be difficult starting in Nov
- Brad Payne:** Per comment above: We've always been in agreement about public schools - we'd have to make a lot of changes to this agreement to account for costs, location, and other decisions that would be impacted by pulling private schools into the scope. 11/29/22 9:12 AM
- Mindy Pillow:** See above. 11/30/22 3:53 PM
- Mindy Pillow:** Brad: I think you all are in agreement with continuing swimming at foss, Can you confirm?
- Mindy Pillow:** great

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Kimberly Milbrath v. Bradley Payne
DeKalb County Superior Court
CAFN: 20FM3914
Consent Document Revisions 12.1.2022

MINDY RESPONDS 12/2/22 ALL CHANGES ACCEPTED/MERGED

Subject: Milbrath Consent Final Permanent Parenting Plan 12.2.2022
Date: Friday, December 2, 2022 at 8:09:51 AM Central Standard Time
From: Mindy Pillow
To: brad.payne@gmail.com, Diane Woods, Karen Griffin, Pillow Hayes Admin, kkmilbrath@gmail.com
Attachments: image001.png, Milbrath Consent Final Permanent Parenting Plan 12.2.2022.docx

Brad:

I have accepted all of your changes except one and we need to remove it or provide more definiteness to it. That is the provision that notifications outside of OFW will be given in urgent situations. We need to remove that or add some language to define the terms. See my comment for suggestions. Other than that, please review but I think we are ready on the PP.

“PUBLIC” STILL IN DOCUMENT

MAJOR DECISIONS

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Mindy Pillow Deleted:

MINDY SENDS IMMEDIATE FOLLOW UP RE: "MISSING" EDIT

Subject: RE: Milbrath Consent Final Permanent Parenting Plan 12.2.2022
Date: Friday, December 2, 2022 at 8:14:14 AM Central Standard Time
From: Mindy Pillow
To: brad.payne@gmail.com, Diane Woods, Karen Griffin, Pillow Hayes Admin, kkmilbrath@gmail.com
Attachments: image001.png, Milbrath Consent Final Permanent Parenting Plan 12.2.2022.docx

Kim just let me know the 15 days did not get saved properly in extracurricular activities. Changed it here

(ALSO A ROLLBACK OF ACCEPTED CHANGE W/COMMENT)

The screenshot displays a document with tracked changes and a comment thread. The document text includes:

the Blaisdell YMCA at least ~~ten~~ (10) days prior to the registration deadline, the Mother shall have the right to choose the extracurricular activities for that season and the Father shall be bound by her selection. Each parent may enroll the children in a lesson or activity that only takes place during his or her parenting time at his or her sole expense; however, the parent shall notify the other parent prior to registration, and share schedules for all practices, games, lessons and performances so that the other parent can participate if he or she so desires.

2. Parenting Time/Visitation Schedules

A. Regular Parenting Time

The parties shall alternate parenting time on a week on/ week off basis, transitioning the Children every Monday upon the return to school, daycare or camp or 9:00 a.m. if school is not in session. If the children are not at school, daycare, or camp on any Monday morning, the parent ~~sending~~ the children for their parenting time will drop them off at 9:00 a.m. ~~to~~ the other parent.

The dropping off parent will be responsible for communicating any necessary deviations from a regularly-scheduled drop-off time with reasonable notice. In any necessary deviations from the scheduled transition, the dropping off parent shall make all reasonable efforts to avoid creating a burden to the receiving parent. Any requirement for the receiving parent to modify their schedule to accommodate a deviation from the regular transition schedule shall be agreed to ahead of time in writing. The week-on/week-off schedule will continue through the major holidays and summer vacation period, apart from what is stated below.

The only item to be exchanged with the children between the parents' households will be the children's backpacks, which they will take with them to school at time of transition. The parents will each maintain clothing, personal items, and everything else the children will need when they are with them. Each parent will provide Children with winter clothing (coats, hats, gloves/mittens, boots). Children shall return to each party with the items in their possession at the prior transition. Mother shall purchase coats, hats, gloves/ mittens, boots for the Minor Children in even numbered years and Father shall purchase hats, gloves/ mittens, boots for the

The comment thread on the right includes:

- Brad Payne Deleted: fifteen
- Kim Milbrath Deleted: ten
- Brad Payne Deleted: 5
- Kim Milbrath Deleted: 0
- Brad Payne Deleted: about
- Mindy Pillow Deleted: .
- Brad Payne Deleted: 1
- Mindy Pillow Formatted: Not Highlight
- Brad Payne Deleted: receiving
- Brad Payne Deleted: pick them up
- Brad Payne Deleted: from

A red circle highlights a comment by Brad Payne: "These registration windows are small, and I'd like to encourage communication of the activities. 12/1/22 10:57 PM". Below it, a reply by Mindy Pillow says "fine".

“PUBLIC” DISAPPEARS FROM DOCUMENT W/O NOTICE

MAJOR DECISIONS

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MINDY STATES INTENT TO SEND TO COURT EARLY

Subject: Re: Milbrath Consent Final Permanent Parenting Plan 12.2.2022
Date: Friday, December 2, 2022 at 11:06:36 AM Central Standard Time
From: Brad Payne
To: Mindy Pillow, Diane Woods, Karen Griffin, Pillow Hayes Admin, kkmilbrath@gmail.com
Attachments: image001.png

You're going to rush this in ahead of even the schedule that you had communicated?

This is a major problem for me Mindy. I've already CC'd you on the email to the court requesting more time.

From: Mindy Pillow <mindy@pillowhayes.com>
Date: Friday, December 2, 2022 at 11:00 AM
To: Brad Payne <brad.payne@gmail.com>, Diane Woods <dwoods@huffandwoods.net>, Karen Griffin <kgriffin@huffandwoods.net>, Pillow Hayes Admin <admin@pillowhayes.com>, kkmilbrath@gmail.com <kkmilbrath@gmail.com>
Subject: RE: Milbrath Consent Final Permanent Parenting Plan 12.2.2022

I am going to send our drafts in to the Court. Thanks.

MINDY SENDS DOC TO COURT AS BOTH PARENTS' COMMENTS

Subject: RE: Final Report of GAL Milbrath v Payne CAFN 20-M-3914-3 - Petitioner's Final Documents
Date: Friday, December 2, 2022 at 11:14:51 AM Central Standard Time
From: Mindy Pillow
To: Roson, Olga, Diane Woods, Hicks, Shannon N., Loder, Karen
CC: Brad Payne, Kim Milbrath, Karen Griffin, Pillow Hayes Admin
Attachments: Milbrath Petitioner's Proposed Final Judgment and Decree Final 12.2.2022.docx, Milbrath Petitioner's Proposed CSA 12.2.2022.docx, Milbrath Petitioner's Proposed Final Permanent Parenting Plan 12.2.2022.docx, Milbrath, Kim Final CSW with F dev 11.28.2022.pdf

Ms. Roson and Ms. Hicks:

We have attempted to reach an agreement on the final documents but we have not been successful.

Mr. Payne has not sent me any revisions to the Consent Final Order which he has had since Monday 11.28.2022 at 4:22 pm.

I believed that we were in agreement on the CSA and CSW that I sent to him on Tuesday 11.29.2022 at 8:41 am after an email exchange regarding duration of child support but he just sent me an email about rental income on the CSW. As there is no rental income included on the CSW and the salaries for both parties are based solely on paystubs, I am really not sure to what he is referring.

I have attached version of the Parenting Plan after we have incorporated revisions from both sides.

Therefore, I have attached Petitioner's proposed final orders as I believed we would have them to the Court on Monday or Tuesday. Mr. Payne will submit his own versions.

Thank you.
