



IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT OF ILLINOIS  
TAZEWELL COUNTY

TOM E. RIDER, )  
Plaintiff/Petitioner, )  
vs. )  
JANE S. RIDER, )  
Defendant/Respondent. )

CASE NO. 89 F 225

**FILED**

NOV 15 1989

*Tammy L. Rider*  
TAMM COUNTY CLERK  
COURT HOUSE BLDG 101

DEFENDANT'S AFFIDAVIT IN SUPPORT OF MOTION TO VACATE

STATE OF ILLINOIS )  
                                  ) ss  
COUNTY OF PEORIA )

After being duly sworn on oath, Defendant, JANE S. RIDER, states as follows:

1. I am the Defendant in this action, and the wife of the Plaintiff, TOM E. RIDER.
2. The Plaintiff and I have three children, namely: Tammy L. Rider, born July 11, 1973; Christina M. Rider, born August 23, 1974; and Grace Sue Rider, born May 29, 1978.
3. As of April, 1988, the Plaintiff and I and our children were living together in the State of Florida, where we had resided for the previous 16 months.
4. In April, 1988, Plaintiff deserted me and our children.
5. On March 2, 1989, Plaintiff returned to Florida, and, without my knowledge or consent, abducted the two oldest children, namely: Tammy L. Rider and Christina M. Rider, fleeing the State of Florida.
6. On April 6, 1989, Plaintiff filed a Petition for Order of Protection in the State of Illinois, alleging that I was guilty of abusing my children.
7. On April 17, 1989, I was served with papers from said action in

Exhibit B

Illinois which stated that a hearing on a Domestic Violence Order of Protection and on the custody of my children was to be heard the following day.

7. As of April 6, 1989, the date Plaintiff filed his Petition for Order of Protection, Florida was the home state of said children, as they both resided in Florida from January, 1987 to March 2, 1989, the date of their abduction.

8. I and my children have significant connections to the State of Florida, as that is where the children and I were residing between January, 1987 and March 2, 1989, and all substantial evidence concerning their care, protection, training and personal relationships is available in that State, and not in the State of Illinois.

9. On or about August 1, 1989, I filed a Petition for Dissolution of Marriage in the State of Florida, asking for temporary and permanent custody of my children.

10. On September 1, 1989, the Circuit Court of the Ninth Judicial Circuit, in and for the County of Osceola County, Florida, found that the State of Florida had jurisdiction to make a child custody determination.

11. On September 19, 1989, said Court entered an Order granting me the temporary custody of Tammy L. Rider and Christina M. Rider, and ordering Plaintiff to immediately return said children to me.

Further deponent sayeth not.

*James S. Rider*  
JAMES S. RIDER, Defendant/Respondent

SUBSCRIBED AND SWORN before me this 17th day of October, 1989.

*Phyllis A. Nevitt*  
NOTARY PUBLIC



IN THE CIRCUIT COURT  
OF THE NINTH JUDICIAL  
CIRCUIT, IN AND FOR  
OSCEOLA COUNTY, FLORIDA.

CASE NO: DR89-1824

JANE S. RIDER

Petitioner/Wife,

vs.

TONY E. RIDER

Respondent/Husband.

AMENDED ORDER REGARDING JURISDICTION

THIS ACTION was heard on Petitioner's Motion to Amend Order  
Decreeing Jurisdiction. On the evidence presented, it is:

ADJUDGED that:

1. This Court has jurisdiction over the custody following  
children born of the marriage:

✓ A. Tamey L. Rider, born on July 11, 1973, in Peoria,  
Illinois.

✓ B. Christine M. Rider, born on August 23, 1974, in  
Denver, Colorado.


2. Respondent was heroby ordered to appear with the three  
minor children at the hearing on temporary matters scheduled for  
September 12, 1989 at 4:00 P.M. of which he was given notice  
previously, on or about August 11, 1989.

DONE and ORDERED in Chambers, at Kissimmee, Osceola County,  
Kissimmee, Florida this the 19 day of September, 1989.

  
CIRCUIT COURT JUDGE

CERTIFICATE OF SERVICE

I CERTIFY that a true and exact copy of the foregoing pleading  
was sent by U.S. Mail/hand-delivered this 20 day of Sept  
1989, to: Modesto Lopez, Esquire, 330 N. Oak Street, Kissimmee,  
Florida 34741, and Tony E. Rider, 107A Washington Square,  
Washington, Illinois 61571.

  
Judicial Assistant