



FILED  
GARFIELD COUNTY, OKLA.

IN THE DISTRICT COURT OF GARFIELD COUNTY  
STATE OF OKLAHOMA

JUL 23 2015

WILLIAM CODY SAWYER,

Plaintiff,

vs.

LAUREN NICHOLE ANDERSON,

Defendant.

MARGARET E. JONES  
CLERK  
DEPUTY COURT CLERK

Case No. FP-2015- 34-01

**PETITION TO ESTABLISH PATERNITY**

The plaintiff, WILLIAM CODY SAWYER, for his cause of action states as follows:

- 1) The plaintiff is a resident of Garfield County, Oklahoma.
- 2) The defendant is a resident of Garfield County, Oklahoma.
- 3) The subject matter of this action is ADALYN RENEE RAYNE SAWYER, born April 19, 2014, sometimes called ("this child").
- 4) This Court has jurisdiction over the parties and subject matter of this action pursuant to the applicable provisions of the Uniform Child Custody Jurisdiction and Enforcement Act ("UCCJEA"), Parental Kidnaping Prevention Act ("PKPA") and the Uniform Interstate Family Support Act ("UIFSA"), and 10 O.S. §89(c).
- 5) Venue is proper with this Court.
- 6) The Federal and State Indian Child Welfare Acts do not apply to this proceeding. Further, this Court has the sole and exclusive jurisdiction in this matter pursuant to the Uniform Child Custody Jurisdiction and Enforcement Act ("UCCJEA") for the following reasons:
  - a) The present address of the child is 425 N. Oakwood, Enid, Oklahoma.
  - b) The child has resided with the following persons at the following addresses for the past five (5) year:
    - i) Since birth with the parties in Enid, Oklahoma, at the above-referenced address.
  - c) I have not participated as a party, witness or in any other capacity, in other litigation concerning the custody of the child in this state or in any other state.

- d) I have no knowledge of any custody proceeding concerning the child pending in any court.
  - e) I know of no other party not a party to these proceedings who has physical custody of the child or claims to have custody or visitation rights with respect to the child.
  - f) The child is not of Indian descent.
- 7) The plaintiff has not participated in any capacity whatsoever in any other litigation concerning the custody of this child, nor is aware of any proceedings that could affect the current proceeding, including proceedings for enforcement and proceedings relating to domestic violence, protective orders, termination of parental rights, and adoption in this state or any other state. Further, plaintiff is not aware of any past custody determination(s) regarding this child in this or any other jurisdiction.
- 8) On the 19<sup>th</sup> day of April, 2014, defendant gave birth to a minor child, ADALYN RENEE RAYNE SAWYER, ("this child") in Enid, Garfield County, Oklahoma.
- 9) The plaintiff is the father of this child and desires this fact to be judicially determined. Further, plaintiff prays for all ancillary relief associated with this determination to include custody and support of this child, with defendant having rights of visitation.

WHEREFORE, the plaintiff prays this Court determine the paternity of this child, establish child support per the Oklahoma Child Support Guidelines, place custody and set right of visitation to the non-custodial parent, allow for the recovery of his attorney's fees and costs expended in this action, and grant such other and further relief which this Court deems just and proper.



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Timothy R. Beebe, OBA # 13247  
302 N. Independence, Ste. 402  
Enid, OK 73701  
580-233-6999  
Attorney for Plaintiff

**VERIFICATION**

STATE OF OKLAHOMA    )  
                                  ) SS:  
COUNTY OF GARFIELD    )

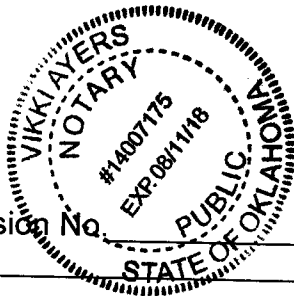
WILLIAM CODY SAWYER, of lawful age, being first duly sworn upon his oath,  
states:

That he is the plaintiff above named; that he has read the above and foregoing  
*Petition to Establish Paternity* and knows the contents thereof, and that the statements,  
allegations and facts therein set forth are true and correct to the best of his information,  
knowledge and belief.

  
\_\_\_\_\_  
WILLIAM CODY SAWYER

Subscribed and sworn to before me this 22<sup>nd</sup> day of July, 2015.

( SEAL )



My Commission No. \_\_\_\_\_  
Expires \_\_\_\_\_

  
\_\_\_\_\_  
Notary Public