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October 11, 1999

Mr. Douglas A. McKinney
P.O. Box 214145
Auburn Hills, Michigan 48321-4145

Re: Hannaford v. Morrison
Case No. 95-4609-DM

Dear Mr. McKinney:

I am in receipt of your October 7, 1999, letter and after discussions with my client allow me to state his position on the issues presented in that letter.

I believe Judge Maceroni will prepare an Order Recalling Bench Warrant, therefore, your Order is not necessary. My client cannot consent to an Order Returning the Condominium keys to Ms. Morrison. Our prior Motion has yet to be heard. Until Judge Maceroni rules on my client's request for security, it would be inappropriate to change the status quo.

Regarding visitation of Ashley, my client is unwilling to allow supervised visitation until there is clear and convincing proof that Ms. Morrison is psychologically capable of coping with Ashley. Referee Toler's June 14, 1999, Order suspended summer parenting time until your client obtained court ordered counseling. The intent of the Order would likewise apply to current visitation.

As I explained on the telephone, I cannot attend a October 18, 1999, 9:00 a.m., Hearing because I must appear before Judge Jakubowski for a scheduled criminal trial date. I therefore request that you schedule your Motion on October 25, 1999.

Very truly yours,

CAPUTO BROSINAN P.C.



By: Harold A. Perakis

HAP/agm
cc: Mr. Edward Hannaford

Exh. 3