

COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

Matter of a Proceeding under Article 6 of the Family Court Act DAYAWATHIE RANKOTH,

Petitioner(s),

50-V-4533/95

Docket No. ~~NY 1786781XX~~ PETITION FOR WRIT OF HABEAS CORPUS

-against- ISMAIL SLOAN,

Respondent(s),

TO THE FAMILY COURT:

The undersigned Petitioner(s), respectfully show that:

- 1. Petitioner(s), (resides) ~~(has offices)~~ at ~~110 W. 41st St., New York, NY~~ <sup>110 W. 41st St., New York 10036</sup> and (is) (are) the mother of (insert name, date of birth) Michael Sloan, d.o.b.: 6/18/88 who (is) ~~(are)~~ the subject(s) of this application.
- 2 Respondent(s) (resides) ~~(has offices)~~ at 2550 Webster St., San Francisco, Ca. , and (is), ~~(are)~~ the father of said minor(s).
- 3. (Upon information and belief,) (T) (the) aforesaid minor(s) (is) (are) in the possession and control of the Respondent(s) and (has) ~~(have)~~ been since April 9, 1995 . (Respondent(s) wrongfully and unlawfully (removed) ~~(held)~~ said minor(s) from the custody of the Petitioner(s) in that (s)he ~~(they)~~ (Respondent(s)) wrongfully prevented or interfered with Petitioner(s) ~~(s) (they)~~ visitation rights with said minor(s) in that (s)he ~~(they)~~ Respondent obtained and located Petitioner's confidential address and was let into the residence by a next door neighbor. Petitioner was running errands. Upon Petitioner's return Respondent asked to take the children for a walk, Petitioner agreed. Respondent never returned with the child. Respondent later called Petitioner and stated he was not returning the child and would take child to Abu Dabi if she attempted to contact her attorney.
- 4. (That Petitioner(s) (has) ~~(have)~~ requested the return of said minor(s) from Respondent(s) and Respondent(s) (has) ~~(have)~~ failed and refused to return said minor(s) to the custody of the Petitioner(s).)
- 5. Said minor(s) (is) ~~(are)~~ not the subject(s) of any order, mandate, judgment or decree of any court of competent jurisdiction nor has any appeal been taken from any such order, mandate, judgment or decree except . nor does any court or judge of the United States have exclusive jurisdiction to order said minor(s) released.
- 6. (The custody of the minor(s) should be returned to the Petitioner(s).) (Visitation rights should be granted to Petitioner(s).) in that

WHEREFORE, Petitioner(s) pray for a Writ of Habeas Corpus directed to the Respondent(s), commanding said Respondent(s) to produce the minor(s) in this Court, in order that (s)he ~~(they)~~ may be given (custody) (possession and control) (of) ~~(of)~~ said minor(s).

Dayawathie Rankoth  
Petitioner(s)  
DAYAWATHIE RANKOTH

VERIFICATION

STATE OF NEW YORK )  
COUNTY OF NEW YORK ss.:

DAYAWATHIE RANKOTH being duly sworn, says that (he) (she) ~~(they)~~ (is) ~~(are)~~ Petitioner(s) in the above-named proceeding and that the foregoing petition is true to ~~(his)~~ (her) their own knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters (he) (she) (they) believes it to be true.

Dayawathie Rankoth  
Petitioner(s)  
DAYAWATHIE RANKOTH

Subscribed and sworn to before me this 10th day of May, 1995  
Evelyn Sepulveda  
(Deputy) Clerk of the Court  
Notary Public

EVELYN SEPULVEDA  
Notary Public, State of New York  
No. 51-4720261  
Qualified in New York  
Commission Expires 12/31/96