

VIRGINIA:

Supreme Court of Virginia

Kristin L. Burns)	
<i>Plaintiff</i>)	
)	
v.)	
)	Petition for Review of
Kenneth W. Sullivan)	<u>2/21/19 Order</u> in Case
<i>Defendant</i>)	2011-06251 and Related
)	Cases - Motion to Exceed
FCPS ¹)	15 Pages
Fairfax County (CPS ² , FCPD ³ , FCSO, ⁴)	
Commonwealth Attorney) ⁵)	
Reston Pediatric Associates)	
G&G Integrated Therapies)	
<i>Third Party Defendants</i>)	
(Rule 3:13))	

Petition for Review of 2/21/19 Order in Case 2011-06251 and Related Cases –
Motion to Exceed 15 Pages

¹ Fairfax County Public Schools

² Fairfax County Child Protective Services

³ Fairfax County Police Department

⁴ Fairfax County Sheriff’s Office

⁵ Fairfax County Commonwealth Attorney

4/1/19 Petition for Review of 2/21/19 Order Case 2011-06251 – **Motion to Exceed 15 Pages**

I, the plaintiff in Case 2011-06251, Kristin Lynn Burns, certified a petition for review of a 2/21/19 Order in the Fairfax County Circuit Court to the Supreme Court of Virginia on 3/22/19.

The 2/21/19 Order (SB page 302)⁶ represented a denial of my request for an injunction, in the form of a restorative and protective order, by the Fairfax County Circuit Court.

Code 8.01-626 provides for a justice of the Supreme Court to “take such action thereon as he considers appropriate under the circumstances of the case”. I am asking a justice to enter a protective and restorative injunction in the civil legal separation and custody proceeding, and related cases. Related cases include numerous criminal misdemeanor charges brought against me by FCPD following my reports to them of criminal acts against myself and my children.⁷ All of the related cases arise from my unsuccessful attempt to protect myself *and* my

⁶ **SB** stands for the “**separately bound**” portion of the 3/22/19 Petition for Review, which is a bound copy of a 3/8/19 Petition for Review to the Court of Appeals including an amendment and contents. Page numbers are written with a sharpie pen in the bottom right hand corner for ease of reference.

⁷ Examples of criminal acts can be found in SB pages 23-24 footnote 43, pages 114-115, and pages 222-223 footnote 5

children from domestic and family violence, initiated in the circuit court with a 4/28/11 Complaint for Separate Maintenance (SB page 156-158).

The Court of Appeals denied my petition for review in a 3/19/19 Denial, which is bound *with* the 3/22/19 Petition for Review to the Supreme Court. In accordance with code 8.01-626 for denied injunctions the petition for review was submitted to the Supreme Court within 15 days of that denial.

In this motion, I am asking the Supreme Court of Virginia to accept the 3/22/19 Petition for Review of 2/21/19 Order in Case 2011-06251 and Related Cases, which exceeds 15 pages, and to accept the style and certification of the petition as sufficient notice to defendants for the injunction I am requesting.

Motion to Exceed 15 Pages - Rules of the Supreme Court of Virginia

1. Rule 5:17A(b) suggests that the rules governing a petition for review pursuant to code 8.01-626 anticipate a single respondent: “At the time the petition for review is filed, a copy of the petition shall be served on counsel for the respondent.” While the 3/22/19 Petition for Review includes several third party defendants in accordance with Rule 3:13, I ask the court to accept that the petition is more than 15 pages long. The petition is about 21-1/2 pages long excluding cover, table of contents, table of

4/1/19 Petition for Review of 2/21/19 Order Case 2011-06251 – **Motion to Exceed 15 Pages**

authorities, and certification. An additional six and a half pages to address the detrimental actions of seven third party defendants to support the injunction I am asking for is a reasonable accommodation to provide an opportunity for expedient justice via a protective and restorative order for me and for my children in the related cases.

2. While the 3/22/19 Petition for Review relates to the custody and care of my two children, I was required by code 17.1-405 to first submit the petition to the Court of Appeals. That requirement means that I am to address assignments of error in both the Fairfax County Circuit Court and the Court of Appeals of Virginia in my petition for review to the Supreme Court of Virginia. It is a reasonable accommodation to accept more than 15 pages to support an adequate review of assignments of error in more than one court from which a denied injunction is being appealed.
3. In Title 20, referenced in code 17.1-410 for final orders of the Court of Appeals, code 20-108 reflects that the care, custody, and maintenance of my children may be revisited from time to time as their benefit may require. While neither the 2/21/19 Order in the Fairfax County Circuit Court or the 3/19/19 Denial of injunction by the Court of Appeals of Virginia

are final orders in accordance with code 20-108, the recommendation of rule 5:17(c)(2) to include statements related to substantial constitutional questions and matters of precedential value is a meaningful one. Three pages of the 3/22/19 Petition for Review, pages 3-7, address constitutional and precedential circumstances in support of the relevance of the injunction I am asking for by the Supreme Court of Virginia. In short, while the injunction I am asking for is restorative to and protective of me and my children, and our fundamental relationships, it also provides the Supreme Court of Virginia the opportunity to set an important precedent that protects our shared constitutional values in the Commonwealth of Virginia.

4. Case 2011-06251 and related cases have to do with the custody and care of my children, and have been ongoing now for nearly 8 years. While I live only about 15 minutes away from my children, I have not been able to spend any time in person with them since 12/17/13, following the designation of a judge from another district. It is a reasonable accommodation to accept a petition for review longer than 15 pages so the petition is able to more clearly and adequately present the history and the more recent circumstances of the related cases in support of a protective

and restorative injunction. The cases do not reflect a single incident by a single defendant that resulted in a single injury to a single person. The cases reflect chronic incidents by multiple defendants that are indicative of systemic injuries being suffered by residents, including children, in the Commonwealth of Virginia.

Motion to Exceed 15 Pages - Virginia Statutes

5. Code 8.01-626 does not provide a limitation on the number of pages in a petition for review to the appeals courts. It does provide me, as “an aggrieved party”, an opportunity for a review of my case(s) by the appeals courts while the local circuit court continues to deny my legal right to request an injunction in the form of an appropriate protective order. My request for an injunction by the Supreme Court of Virginia is being made to protect health, safety, and constitutional rights. Without injunction by the Supreme Court of Virginia, the history of the related cases represents that

further injuries will be sustained by me and by my children. Please also reference item 8.⁸

Motion to Exceed 15 Pages - The Constitution of Virginia

6. In Article VI Section 6 of the Constitution of Virginia, the Supreme Court of Virginia is asked to provide reasons for its decisions, and preserve them in the record of cases:

Section 6. Opinions and judgments of the Supreme Court. When a judgment or decree is reversed, modified, or affirmed by the Supreme Court, or when original cases are resolved on their merits, the reasons for the Court's action shall be stated in writing and preserved with the record of the case. The Court may, but need not, remand a case for a new trial. In any civil case, it may enter final judgment, except that the award in a suit or action for unliquidated damages shall not be increased or diminished.

I believe my first appeal to the Supreme Court of Virginia of cases related to case 2011-06251 was in 2013. From that first appeal to present, I have not had a single appeal to the Supreme Court of Virginia heard or reviewed on

⁸ It is important that the Supreme Court of Virginia also review this petition on the merits, while a prior remand to the Court of Appeals in record 150621 to review a previous petition on the merits was again dismissed without a review.

the merits of the case. In the last two petitions for review I submitted in consideration of code 8.01-626, the Supreme Court affirmed the circuit court's refusal of an injunction in a single sentence without any explanation (Attachments A and B). During that time, my children and I have lost nearly two more years of having any relationship with one another. They are now both teenagers at 12 and 15 years old.

7. Constitutional rights are intended to provide for safe and secure families and communities for all of us in the Commonwealth of Virginia, to the best of our shared abilities:

Article I. Bill of Rights, Section 1. Equality and rights of men:

That all men are by nature equally free and independent and have certain inherent rights, of which, when they enter into a state of society, they cannot, by any compact, deprive or divest their posterity; namely, the enjoyment of life and liberty, with the means of acquiring and possessing property, and pursuing and obtaining happiness and safety.

My cases represent that residents of Virginia, including children who are typically more vulnerable than adults, are being denied constitutional rights by the local courts and that agencies and professionals that we rely on to protect our health, safety, and constitutional rights are instead causing or

contributing to domestic, family, and community violence.⁹ The natural repercussion of that, without the reasonable and meaningful intervention of the Supreme Court of Virginia at this time, is a shared loss of our rights to freedom, independence, posterity, life, liberty, happiness and safety.

When violence is permitted to spread or repeat itself, unchecked and unrestrained, it can show up at any of our homes and in any of our communities. Domestic, family, and community violence undermine the foundation and intent of our Constitution.

8. The Constitution of Virginia in Article VI Judiciary Section 5 provides for the Supreme Court to make rules governing the course of appeals, and the practice and procedures in courts of record of the Commonwealth.

Section 5. Rules of practice and procedure.

The Supreme Court shall have the authority to make rules governing the course of appeals and the practice and procedures to be used in the courts of the Commonwealth, but such rules shall not be in conflict with the general law as the same shall, from time to time, be established by the General Assembly.

⁹ Domestic violence is typically understood to be a pattern of coercive behaviors used by an individual to gain or maintain power and control over another individual in the context of an intimate, dating, or familial relationship. Forms of domestic violence may be criminal (such as physical assault or abuse of an incapacitated person) or not (such as verbal abuse or threats of violence). This definition of violence is useful in recognizing family and community violence.

While the Rules of the Supreme Court of Virginia are established by the Constitution of Virginia to support effective procedures for the fair and proper administration of justice, they are not intended to override or prohibit statutory or constitutional rights. Reference also item 5.

9. The Constitution of Virginia Article VI Judiciary Section 4 provides for retired judges, and judges from other districts, to be *temporarily* assigned by the Supreme Court of Virginia to the Fairfax County circuit court for the improvement of the administration of justice and the expedition of judicial business:

Section 4. Administration of the judicial system. The Chief Justice of the Supreme Court shall be the administrative head of the judicial system. He may temporarily assign any judge of a court of record to any other court of record except the Supreme Court and may assign a retired judge of a court of record, with his consent, to any court of record except the Supreme Court. The General Assembly may adopt such additional measures as it deems desirable for the improvement of the administration of justice by the courts and for the expedition of judicial business.

In the 3/22/19 Petition for Review, I am bringing forward assignments of error regarding a chronic abuse of discretion by a judge designated to case 2011-06251 by the Supreme Court of Virginia in August of 2013 at the

request of a prior chief judge of the Fairfax County Circuit Court. Having designated the judge to the case, the Supreme Court of Virginia has a responsibility to ensure that he is judging my case fairly in accordance with our laws, and to intercede reasonably and appropriately if the Supreme Court agrees that he has abused his discretion in the case(s).

Explanation of Style, Certification, and Injunction Sought in the 3/22/19

Petition for Review

Style of the Case

In the style of the case on page one, I list the following as the petitioner and respondents:

Kristin L. Burns

Plaintiff

v.

Kenneth W. Sullivan

Defendant

FCPS¹⁰

¹⁰ Fairfax County Public Schools

Fairfax County (CPS¹¹, FCPD¹², FCSO,¹³
Commonwealth Attorney)¹⁴
Reston Pediatric Associates
G&G Integrated Therapies
Third Party Defendants
(Rule 3:13)

Certification of the 3/22/19 Petition for Review

In the certification of the 3/22/19 Petition for Review, I certified that I noticed the following counsel and unrepresented parties:

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John Foster
FCPS Division Counsel

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¹² Fairfax County Police Department

¹³ Fairfax County Sheriff's Office

¹⁴ Fairfax County Commonwealth Attorney

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G&G Integrated Therapies
Dr. Michael Gennari, Ph.D.
Third-Party Defendant, pro se
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Via mail (no email address available)

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via ray.morrogh@fairfaxcounty.gov, Commonwealth Attorney

4/1/19 Petition for Review of 2/21/19 Order Case 2011-06251 – **Motion to Exceed 15 Pages**

Temporary Injunction Sought

Pending further proceedings at the local court, I asked the Supreme Court of Virginia to provide an injunction with both protective and restorative relief. The protective relief I requested, for good cause provided in the 3/22/19 Petition for Review, includes restraints on the behavior of Mr. Sullivan, Ms. Leckey, Mr. Bodner, Dr. Gennari, FCPD, FCSO, and the Commonwealth Attorney:

Custody and Visitation - Preliminary Protective Relief

- a. Sole physical and joint legal custody of the children, Liam Paul Burns-Sullivan and Emma Siobhan Burns-Sullivan, is granted to the plaintiff, Kristin Lynn Burns. Visitation for her children's father, Kenneth William Sullivan, is suspended until further order of the court.
- b. Mr. Sullivan will communicate reasonably with Ms. Burns at her request in support of this order, and in support of the best interests of their children.

Health, Security, and Safety - Preliminary Protective Relief

- c. Ms. Burns and her children are granted temporary exclusive use of the home in which the children live, with the mortgage and utilities being paid by Mr. Sullivan until further order of the court.
- d. **Fairfax County (Public Schools)** will pay \$2,500 per month to Ms. Burns, beginning within 30 days of this order, in support of the restoration of her relationships with her children and their recovery from the injuries she and her children have suffered.¹⁵

¹⁵ In the 3/22/19 Petition for Review this item could have read "Fairfax County Public Schools" instead of simply "Fairfax County". The monthly amount I am asking to support my and my children's recovery from the circumstances is a

- e. Mr. Sullivan will immediately disclose any current medical or therapeutic treatment plans in place for both children to Ms. Burns; and provide any medicines or other items necessary to her that the children may require as a part of those treatment plans.
- f. All providers of academic, medical, dental, child care, or therapeutic services are ordered to communicate reasonably with Ms. Burns, and share all available information regarding her children's care on her request.
- g. Mr. Sullivan will obtain or maintain health care coverage for their children until further order of the court.
- h. Counsel for Mr. Sullivan, Kathryn D. Leckey, shall be removed from any lists of attorneys qualified to work as a guardian ad litem, and be prohibited from any legal services that involve the safety or well-being of children, until further order of the court.
- i. The guardian ad litem appointed to the children in the civil case, Mark Brodner, shall be removed from any lists of attorneys qualified to work as a guardian ad litem, and be prohibited from any legal services that involve the safety or well-being of children until further order of the court.
- j. Ms. Burns may petition the courts in Virginia within the standard procedures of the court without requiring judicial permission in advance.
- k. In consideration of the crime victim and witness rights act, and to prevent further retaliation or threat to Ms. Burns or her children, including by law enforcement or the Commonwealth attorney; Ms. Burns and her children are granted immunity from arrests or prosecutions in any cases related to case 2011-06251, and to the circumstances of domestic, family, and community violence they represent.
- l. Dr. Michael Gennari, Ph.D, of G&G Integrated Therapies shall be prohibited from any therapeutic services that involve the safety or well-being of children until further order of the court.

conservative estimate of the monthly cost to educate my two children in the public school system. While it should not be necessary to ensure a statutory right, I could also add to this item that I have the choice to reestablish the home instruction program I had established for my two children in 2010-2011 in accordance with code 22.1-254.1.

Overview of Style and Certification for the Injunction I am Seeking

- I. I have only listed myself, Kristin L. Burns, as the petitioner in this case. The injunction I am asking for includes protection for my two children, Liam and Emma Burns-Sullivan. Statutes for protective orders, such as code 19.2-152.9(2), include protection for both the petitioner and the petitioner's family members. The intent of Article 1 Section 8-A of Virginia's Constitution is to provide me and my children the constitutional right to protection from "further harm or reprisal" and to "restitution". The designated judge in case 2011-06251 sua sponte appointed Mark Bodner to represent my children's legal interests in the case(s) as their guardian ad litem. As certified in the 3/22/19 Petition for Review, he has been noticed of the petition, and the specific injunction I am requesting in the case which includes restoring my relationships with my children and prohibiting him from providing legal services that could impact the health and safety of children.
- II. For most of the defendants listed in the style of the case, it is easy to recognize proper notice to either a pro se defendant or counsel for the defendant. In some cases, it is not straightforward because of the

circumstances the related cases represent. Below is an overview of each defendant for whom I am asking for either a restraint on their behavior or temporary restitution, and how notice was certified to the defendants in relation to 3/22/19 Petition for Review:

- A. Defendant Sullivan is the primary defendant in the case. He is represented by Kathryn D. Leckey, Counsel for the Defendant, who was noticed via email of the 3/22/19 Petition for Review. In the temporary injunction I am asking for, I have asked that his behavior be restrained to prevent further harm to me, my children, and our fundamental parent-child relationships, and that he provide supportive restitution, in **items a, b, c, e, and g**. In the temporary injunction I am asking for, I have also asked that Ms. Leckey be prohibited from providing any legal services that could impact the health and safety of children.
- B. Defendant FCPS is represented by FCPS Division Counsel. John Foster, who is with FCPS Division Counsel, was noticed via email of the 3/22/19 Petition for Review. In the injunction I am asking for, I have asked for restitution from FCPS in **item d**.

C. Defendant Fairfax County is represented by the Office of the County Attorney.

i. In a related civil suit dismissed in 2013, representatives of the Office of the County Attorney appeared on behalf of the CPS, FCPD, and FCSO. As mentioned above in item B., FCPS has a separate Division Counsel. I specifically certified notice to May Shallal (formerly May Kheder) in the Office of the County Attorney. She was the Assistant County Attorney that attended a hearing in case 2011-06251 on 12/17/13, for which the transcript of the opening of that hearing is included in SB page 66.¹⁶ While the budget for FCPS is allotted by the Fairfax County Board of Supervisors, the temporary restitution I am asking for in **item d.** could be provided by either Fairfax County or FCPS directly.

¹⁶ There are two other attorneys in the Office of the County Attorney that have appeared in related cases. While not certified in the 3/22/19 Petition for Review, I do also include them on email notices to Ms. Shallal.

ii. The Commonwealth Attorney is an elected office in the county of Fairfax. I certified the 3/22/19 Petition for Review via email to both the Commonwealth Attorney, Ray Morrogh, directly, and to the Office of the County Attorney. The protection I am seeking in **item k.** includes restraint on the behavior of FCPD, FCSO, and the Commonwealth Attorney in the form of immunity from arrests or prosecutions related to the circumstances of domestic, family, and community violence represented by case 2011-06251 and related cases. For the request for protective immunity, the Office of the County Attorney has been noticed on behalf of FCPD and FCSO. FCPD typically issues warrants for arrests and frequently prosecutes criminal misdemeanor charges in the general district court, and FCSO manages incarcerations. The Commonwealth Attorney frequently prosecutes misdemeanor appeals and felony cases in the circuit court, and has been noticed both directly and through the Office of the County Attorney. While the Commonwealth Attorney is an attorney at law, when he

has received notice of my petitions to the appeals courts he has not notified me of an alternate legal representative in regards to legal notice in civil case 2011-06251.

- D. Defendant Reston Pediatric Associates is represented by Steven M. Garver. Mr. Garver defended Reston Pediatric Associates in the related civil suit dismissed without a hearing on the merits in June of 2013. Following dismissal of that suit, Reston Pediatric Associates continued to deny my legal right to access my children's health records in accordance with code 20-124.6. Mr. Garver did not provide subpoenaed records to the parties (reference SB pages 56-57) prior to the 12/17/13 hearing. In **item f.** I am asking Reston Pediatrics (along with all providers of academic, medical, dental, child care, or therapeutic services) to provide me with records about my children in order to help me protect and restore my children's health and safety.
- E. Defendant G&G Integrated Therapies is the company name of the therapeutic practices of Dr. Michael Gennari, who is an unrepresented party in the case. As certified, I sent legal notice of

the 3/22/19 Petition for Review to Dr. Michael Gennari via mail. I have also notified him via voicemail when I have mailed notice to him. After I dropped off prior legal notices at his office, he threatened me with trespass if I go to his office in person. He often refuses to accept legal notices I send to him either through the post office or FEDEX. I am, for good cause presented in the 3/22/19 Petition for Review, asking that he be temporarily restrained from any therapeutic services that could impact the health or safety of children in **item l**. His refusal to accept legal notice should not constitute a failure on my part to provide him legal notice, an opportunity to respond to the Supreme Court of Virginia regarding my injunction request, and an opportunity for him to obtain legal counsel to represent him in the case.

- F. As a part of the temporary injunction, I am also asking in **items h.-i.** that counsel for the defendant, Ms. Leckey, and the court-appointed guardian ad litem for my children, Mr. Bodner, be temporarily restrained from providing any legal services that could impact the health and safety of children. They are both listed as qualified

guardian ad litem in the list provided on Web site for the Supreme Court of Virginia and are trained in recognizing child abuse and neglect (reference footnote 6 above). While they have been properly noticed of the 3/22/19 Petition for Review as counsel for the defendant and a legal representative for my children, I have also made them aware of the temporary restraints I am asking the Supreme Court of Virginia to place on them in this injunction. Neither of them, as attorneys at law, have provided me with the name of any counsel who might be representing them.

G. In **item j.**, I also ask that my right to petition the courts reasonably without prior judicial permission be restored. While not required to by the Rules of the Supreme Court of Virginia, I did mail a courtesy copy of the 3/22/19 Petition for Review to the designated judge, Judge Poston, and to the chief judge of the circuit court, Judge White, on 3/28/19. In consideration of item 9 on pages 10-11 above, it would be in the discretion of the Supreme Court as a part of **item j.** to terminate the designation of Judge Poston to case 2011-06251.

Conclusion

I **Ask** that the Supreme Court of Virginia recognize that all parties for whom I am asking for temporary injunctive restraint or temporary injunctive restitution have been reasonably noticed, and had an opportunity to respond to my request for injunction in the 3/22/19 Petition for Review. As of this day, 4/1/19, the seven days provided for each of them to respond in accordance with Rule 5:17A(g) have passed.

I **also ask** the Supreme Court of Virginia to accommodate the 3/22/19 Petition for Review, which is more than 15 pages long.

I certify that this motion is neither frivolous, nor intended to harass; but is a sincere plea for court intervention in relation to my and my children's health, safety, and fundamental parental rights; and the ends of justice for my original complaint for separate maintenance in the Fairfax County Circuit Court on 4/28/2011; an attempt to safely separate myself and my children from domestic and family violence in our home, with the hope of maintaining our familial relationship with their father. It is true to the best of my knowledge and ability.



Kristin L. Burns

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I certify that I have requested a good faith effort on numerous occasions to resolve these matters with the following; that the separately bound record is an accurate copy of the record of the lower tribunal(s) and contains what is necessary for a review of this petition; and that a copy of this 4/1/19 Petition for Review of 2/21/19 Order in Case 2011-06251 and Related Cases – Motion to Exceed 15 Pages to the Supreme Court of Virginia will be noticed via mail or email on this day, 4/1/19 to:

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4/1/19 Petition for Review of 2/21/19 Order Case 2011-06251 – Motion to Exceed 15 Pages

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Please note my address has recently changed and is listed above

4/1/19 Petition for Review of 2/21/19 Order Case 2011-06251 – **Motion to Exceed 15 Pages**

4/1/19 PETITION FOR REVIEW-MOTION TO EXCEED
FIFTEEN PAGES- ATTACHMENT A

VIRGINIA:

*In the Supreme Court of Virginia held at the Supreme Court Building in the
City of Richmond on Thursday the 22nd day of June, 2017.*

Kristin L. Burns,

Petitioner,

against

Record No. 170228
Court of Appeals No. 1156-16-4

Kenneth W. Sullivan, et al.,

Respondents.

Upon a Petition Under Code § 8.01-626
Justices Goodwyn, McClanahan, and Powell

On May 25, 2017 came the petitioner, who is self-represented, and filed a "motion
for explanation and reconsideration" of the Court's March 16, 2017 order in this case.

Upon consideration whereof, the Court denies the motion.

A Copy,

Teste:

Patricia L. Harrington, Clerk

By:



Deputy Clerk

4/1/19. PETITION FOR REVIEW - MOTION TO
VIRGINIA: EXCEED FIFTEEN PAGES - ATTACHMENT B

*In the Supreme Court of Virginia held at the Supreme Court Building in the
City of Richmond on Friday the 26th day of October, 2018.*

Kristin L. Burns,

Petitioner,

against Record No. 181318

Kenneth W. Sullivan,

Respondent.

Upon a Petition Under Code § 8.01-626
Justices Mims, Kelsey, and McCullough

Upon consideration of the petition filed pursuant to Code § 8.01-626, the said
petition is denied.

A Copy,

Teste:

Patricia L. Harrington, Clerk

By:



Deputy Clerk