

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
FAMILY LAW DIVISION

IN RE: THE MARRIAGE OF

ANDREW CABEZUDO,

Petitioner/Husband,

and

GERALDINE CABEZUDO,

Respondent/Wife.

Case No.: 25-002342-FD

**NOTICE OF FILING EXHIBIT IN SUPPORT OF EMERGENCY
VERIFIED DECLARATION AND EMERGENCY PRO SE MOTION**

COMES NOW the Petitioner, Geraldine Cabezudo, pro se, and hereby gives notice of filing the following exhibit in support of the:

- Emergency Verified Declaration of Geraldine Cabezudo in Support of Judicial Disqualification, Emergency Reassignment, Change of Venue, and Relief from Biased Jurisdiction, and the
- Emergency Pro Se Motion for Judicial Disqualification, Emergency Reassignment, Change of Venue, and Relief from Biased Jurisdiction, both filed contemporaneously or previously in the above-captioned matter.

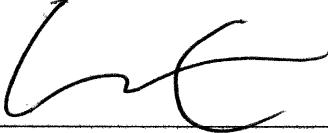
EXHIBIT FILED:

Exhibit A – Copy of the August 7, 2025 Court Order referenced in the accompanying motion and declaration. This order is material to the grounds raised in support of the motion for judicial disqualification and emergency reassignment.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Filing Exhibit and attached Exhibit A has been furnished via email to: Garth R. Goodman, Esq., Attorney for Petitioner/Husband, garth@goodmanatlaw.com, on this 14th day of August, 2025.

Respectfully submitted,



Geraldine Cabezudo, Pro Se Respondent



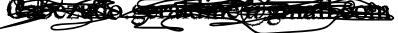


Exhibit A

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
FAMILY LAW DIVISION

IN RE: THE MARRIAGE OF:

ANDREW CABEZUDO,

UCN: 52-2025-DR-002342-XX-FD-FD

CASE NO. 25-002342-FD-12

Petitioner/Husband,

and

GERALDINE CABEZUDO,

Respondent/ Wife.

/

**ORDER AWARDING TEMPORARY SOLE PARENTAL AND 100% TIMESHARING
TO FATHER**

THIS CAUSE, having come before the Court on Monday, July 28, 2025, for a hearing to address temporary parental responsibility and timesharing; the parties appearing with their respective counsel; the Court having heard testimony of the parties and argument of counsel; the Court having reviewed its prior Orders, the Court File and being otherwise duly advised in the premises; the Court makes the following findings of fact and conclusions of law:

A. A unique aspect of Florida Family Law as set forth by the Florida supreme court is the concept of “therapeutic justice” wherein the Court may recognize difficult and challenging aspects of a case, especially when children are involved, and the Court attempts to make rulings with the goal to get everyone to a better place.

B. This Court will discuss, encourage, urge and, at times, if children are involved, beg parties to take steps to get better. However, no one can fix anyone else. The party with the problem/issue needs to do it him/herself.

C. The parties were together as a couple for a period of time and then married. At the time of separation, their marriage was of short duration. The marriage produced two children, one of whom was born with Downs' Syndrome.

D. Why some children are born special or with developmental delays is unfortunate, sad, and quite candidly, breaks our hearts. Most parents and adults just want a normal, regular upbringing for a child. Such matters make a proceeding more difficult with the first and foremost consideration being the children, then the parents and then the "village" of surrounding people. Statistically, parents with special needs children do not often stay together. This Court understands how difficult and challenging raising a special needs child may be for the parents.

E. This Court heard both parties testify at the June 23, 2025 hearing. The Court reviewed the pleadings and motions. What the Court heard was the opposite of what was in the children's best interests. The Court heard one parent (Mother) totally viewing the situation from her own perspective and candidly testifying to taking many steps to keep the other parent (Father) away from the children and substantially remove that parent out of the children's lives. The Court heard Mother wanted to start over in a new relationship in a different location.

F. Based on the pleadings and position taken by Mother at the June 23 hearing, Mother made herself absolutely clear that she is right about everything and anything contrary to her position was bad, wrong, etc.

G. At the conclusion of the June 23 hearing, the Court took steps trying to accomplish: (a) level the playing field between the parents and to award makeup time between Father and the Children due to Mother's overall conduct in keeping Father away from the Children yet, arguing to the contrary, Father could move from where he resided, live in an RV near Mother's new residence in an area Father had nothing to do with. Mother's argument was absurd; and, (b)

sending a message that no justification existed at that point to keep Father from being a material part of the Children's lives.

H. The Court tried to accomplish therapeutic justice upon conclusion of the June 23 hearing and then to have the parties come back on July 28, 2025 to address if Mother was in a better place.

I. Instead, based on all information available to the Court on this Date, Mother's behavior at the safe exchange zone on June 28, 2025 was a setup whereby she anticipated and prepared for the opposite of what the Court had expected. The Court hoped the parents would get the children excited about the exchange and remove any conflict. Mother's conduct was the opposite of what the Court had hoped.

J. In defiance of this Court's Order stemming from the June 23 hearing, Mother did not transfer the Children to the Father on that date. Rarely does this Court issue an emergency child pick up order, but the circumstances warranted one. Another week passed since entry of the Emergency Child Pickup Order before Mother complied and handed over the Children to local law enforcement to be picked up by Father.

K. At around the same time, Mother went "forum shopping" and sought an domestic violence injunction against Father for protection of the Children in Marion County, Florida. The Marion County judge saw through Mother's filings and dismissed her Petitions for Protection.

L. Since the June 23 hearing, Mother totally and completely ignored this Court's efforts to promote therapeutic justice and took significant steps to thwart those efforts.

M. During today's hearing, the Court heard Mother request to be trusted and that she has since learned that her behavior and conduct was not appropriate. When asked by Father's counsel as to what role she played in adverse childhood experiences upon her children, an

extensive delay occurred and then Mother's only thought of a comment she made to the parties' eldest child during a recent audio/visual call at which time she asked the Child if he wanted to speak more with her.

N. At today's hearing, the Court had hoped it would hear that therapeutic justice was followed and that Mother got better. This Court is saddened as to what occurred since June 23 to this Date.

O. This Court does not trust Mother at this time. It just cannot. Mother's actions have been self-centered, self-serving and, at times, false. When asked tough questions at today's hearing, Mother did not add anything assuaging this Court's concerns.

P. Given the history of this case for last few months and especially considering Mother's actions in this case, the overriding issue is the Mother's concerted and inappropriate behavior, and at times, her false attacks toward Father.

Q. Children are currently in an environment at Father's home which is safe, appropriate, nurturing, and appropriately meets the medical and educational needs of both Children including the Paternal Grandmother's assistance.

R. This Court is not convinced that Mother is able to act appropriately and to not continue parental alienation of the Children against Father and to achieve the goals of therapeutic justice as this Court so desperately tried to achieve.

It is thereby,

ORDERED AND ADJUDGED as follows, until further order of this Court:

1. Father is awarded temporary sole parental responsibility over the Children's education, development, therapy, extra-curricular activities, day/aftercare and all other aspects of childrearing which may material impact the parties' Minor Children.

2. Father is directed to keep Mother advised of all educational, developmental, therapeutic, extracurricular activities and day/aftercare information. Father has the sole authority to make decisions regarding these areas. Mother shall not have any direct contact with the school, specialist, therapist, day/aftercare provider, etc.

3. Father shall have 100% temporary timesharing. Mother shall have two (2) supervised visits with both Children at the Angels Against Abuse facility in Largo, Florida. These supervised visits are between Mother and Children. Mother shall not have any third person or persons in the room or in the Building. Father shall be responsible for the costs/fees associated with supervised timesharing between Mother and Children without prejudice to a latter allocation or reimbursement at a later date. These sessions shall be up to 2 hours per session.

4. The parties shall cooperate and get on schedule for supervised timesharing and telephone calls which works for everyone's schedules and urges the attorneys to help their Clients in scheduling supervised timesharing. If the parties are unable to agree on a schedule for supervised timesharing, this Court will hear the matter with the attorneys and scheduling manager for Angels against Abuse, and thereby work out a schedule.

5. Mother shall have three (3) telephonic, Facetime, or other appropriate audio/visual contact up to 30 minutes per contact. Father shall initiate the contact between Mother and Children. Both parties have the full right to video and record communications between Mother and Children in the least obtrusive manner as possible. This Court looks forward to a day when further recording will not be necessary but this case is not there yet.

6. A further hearing is scheduled for **Wednesday, October 1, 2025 at 10:00 AM for two (2) hours** to address timesharing and parental responsibility. This hearing will be **in-person** (not by Zoom or telephone conference).

7. This Court grants Father's Motion to Take Judicial Notice filed on July 16, 2025 and hereby takes judicial notice of the Marion County domestic violence proceeding filed by Mother in the matter of Geraldine Cabezudo obo (the Children) v. Andrew Cabezudo, Case No. 42-2025-DR-002255-DRAM/Family Court Division.

8. This Court acknowledges and affirms that it has exclusive jurisdiction over these Children and over the parties to this Proceeding. This Court is the appropriate venue. This Court commits itself to be responsive in this matter especially when minor children are involved.

DONE AND ORDERED in Chambers, St. Petersburg, Florida.

Electronically Conformed 8/7/2025
Jack Helinger

Hon. Jack Helinger,
Circuit Court Judge

Copies furnished to:

Garth R. Goodman, Esq. (for Petitioner/Husband)
Alexa V. Saab, Esq. (for Respondent/Wife)