

Approved, SCAO

Original - Court  
1st copy - Judge/Assignment clerk (green)  
2nd copy - Respondent (blue)

"OAKLAND"  
"COUNTY" 14-815632-PP



JUDGE LISA GORCYCA

PATTERSON, MER. v. GODBEE, RALPH

Court telephone no.

(248) 975-9511

STATE OF MICHIGAN  
6th JUDICIAL CIRCUIT  
Oakland COUNTY

MOTION TO  
MODIFY, EXTEND, OR TERMINATE  
PERSONAL PROTECTION ORDER

Court address

1200 N. Telegraph Rd., Pontiac, MI 48341-1043

<b>B</b> Petitioner's name Merica Patterson Address and telephone no. where court can reach petitioner 2858 Cottonwood Drive Unit B Waterford, MI 48328 (586) 918-7272	Age 28
	Respondent's name, address, and telephone no. Ralph Lloyd Godbee 20273 Rodeo Ct. Southfield, MI 48075 (248) 225-2191

Respondent's name, address, and telephone no. Ralph Lloyd Godbee 20273 Rodeo Ct. Southfield, MI 48075 (248) 225-2191	Age 46
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MOTION

- C** 1. On 01/02/2014 a personal protection order was entered by this court.  
Date
- D** 2.  a. I am the respondent. I ask the court to conduct a hearing to  modify  terminate the order.  
 b. I am the petitioner. I ask the court to conduct a hearing to modify the order.  
 c. I am the petitioner. I ask the court to  extend  terminate the order.  
 Explain why you want the order modified, extended, or terminated. If box a. is checked, the respondent must show good cause if the order was issued after a full hearing or if more than 14 days have passed since the order was issued ex parte (without a hearing).

The allegations made in the Petition, on which the ex parte order was based, are extremely misleading, selective and incomplete. See attached verified statement of the Respondent. When all of the relevant facts are considered, the Petitioner will be unable to meet the burden of proof required for continuation of the personal protection order. See MCL 600.2950, MCR 3.310(B)(5), and Pickering v. Pickering, 253 Mich App 694, 659 NW2d 649 (2002). Therefore, the order must be terminated.

- E**  3. I have a next friend motioning for me. I certify that the next friend is not disqualified by statute and is an adult.

**F** 01/09/2014  
Date

*Ralph L. Godbee*  
Signature of moving party  
*Abby B. Sahrhoff P45137 1/9/14*  
Attorney for Respondent

Complete this Notice of Hearing only if you checked box 2.a. or 2.b. above.

NOTICE OF HEARING

- G** You are notified that a hearing has been scheduled to modify, extend, or terminate the personal protection order issued in this case.

Judge: Lisa Gorcyca  
Date: 1/22/14  
Time: 1:30 pm  
Location: 4B

NOTICE  
THIS ORDER CONTAINS A DATE  
SET BY THE COURT. YOU WILL NOT  
RECEIVE FURTHER NOTICE OF THIS  
DATE  
JUDGE'S CHAMBERS

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

The court can modify, extend, or terminate the order even if you do not attend the hearing. It is important for you to attend.

**H** \_\_\_\_\_  
Date

Signature of moving party

MCL 600.2950, MCL 600.2950a, MCR 3.707

MDP-dft

**VERIFIED STATEMENT OF RESPONDENT RALPH GODBEE  
IN SUPPORT OF HIS MOTION TO TERMINATE PERSONAL PROTECTION ORDER**

I have never threatened to kill or physically injure Merica Patterson. Ms. Patterson and I have been involved in a dating relationship for approximately 18 months. The statements made in Ms. Patterson's Petition give the misleading impression that I have been making unwanted contact with her since August of 2013. Nothing could be further from the truth.

On December 10, 2013 Merica Patterson and I became engaged to be married when she accepted my proposal during a vacation cruise to the Bahamas. By mid December, Ms. Patterson had broken our engagement. At that time, our relationship returned to the courtship stage, as it had several times in the past. I courted Ms. Patterson through the Holiday season, as I had during prior rough spots in our relationship. I e-mailed her bible verses and positive affirmations, and I expressed my love for her. I did not make threats, and I did not do or say anything that would make a reasonable person fear violence or interference with her freedom.

On December 31, 2013, I sent Ms. Patterson an electronic message via my financial institution offering to give her the money to pay her January rent. Ms. Patterson accepted my offer. She took the rent money and has not returned it to me. I interpreted her conduct as a sign that our relationship was once again moving forward.

However, at approximately 7:00 p.m. on New Year's Eve, Ms. Patterson informed me that she was in a relationship with someone else and no longer wanted me to contact her. I attempted briefly to get her to reconsider her decision. I had no success. I last contacted her on January 3, 2014, wishing her well in the choices she has made.

I was shocked to learn from a reporter for the Detroit News that Merica Patterson had obtained a Personal Protection Order against me. The following is a response to the specific allegations Ms. Patterson is making:

1. I deny that I have been harassing Ms. Patterson or making threats against her. I deny that I have been harassing Ms. Patterson's friends. I have changed my telephone number once in the last 18 months for reasons that do not relate to Ms. Patterson. Ms. Patterson is aware of all of my e-mail accounts. I admit contacting Merica Patterson over the previous months and deny vigorously her implication that the contact was objectionable. We vacationed in Toronto and Niagara Falls in September. Also in September, I spent her birthday with her in a local hotel. We dated earnestly through the Fall/Winter of 2013, when I often cohabited with her at her address, though I kept a home of my own. Ms. Patterson accepted my proposal of marriage in December, which is completely out of keeping with the allegations she makes in paragraph 1. I do not know what pictures Ms. Patterson is referring to, but did tell her that I wanted to post pictures of our engagement on line.

2. I deny making this statement to Ms. Patterson.

3. I have not made any threats to Ms. Patterson. I do not recall making the statement she gives as an example of my supposed threats.

4. I deny that I broke into Ms. Patterson's home and I deny that I stole any item. I had keys to Ms. Patterson's home and the alarm code. I removed two items from the home, but I did not steal them. I later gave those items to the Waterford Police. No charges were ever filed against me regarding this incident.

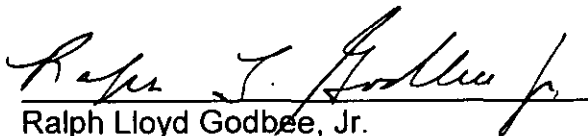
Ms. Patterson and I went on vacation together twice after this incident. We continued to date with the intention of becoming married. She agreed to marry me on December 10<sup>th</sup>. All of these facts are in direct contradiction to the statement in her Petition that the August incident made her fear violence or interference with her freedom.

\* items on last page of Addendum to Petition. I am the former Chief of Police of the City of Detroit. I am also the pastor of a church. The misleading and in some instances outright false statements in Ms. Patterson's Petition are impacting my effectiveness as a pastor and may impact my ability to obtain future employment. I believe these statements were made with the intent to hurt me personally and professionally.

I ask this honorable Court to grant my motion and terminate the ex parte personal protection order against me.

Verification under MCR 2.114(2)(b): I declare that the statements above are true to the best of my information, knowledge and belief.

Dated: 01/09/2014

  
Ralph Lloyd Godbee, Jr.