

**IN THE CHANCERY COURT OF YALOBUSHA COUNTY, MISSISSIPPI  
SECOND JUDICIAL DISTRICT**

**GERALD BAILEY AND NANCY BAILEY**

**PETITIONERS**

**VS.**

**CAUSE NO. 11-03-37**

**JIMMY BAILEY AND TONIA BAILEY**

**RESPONDENTS**

**MOTION TO ASSESS ATTORNEY FEES**

COMES NOW, Respondent Tonia Bailey, and pursuant to § 93-16-3(4), Mississippi Code 1973, respectfully moves the Court for the assessment of attorney's fees, and in support of said motion would show unto the Court the following to wit:

1. Respondent is the mother of the minor children, Cameron Cole Bailey and Devin Wayne Bailey.
2. Respondent resides in Water Valley, Mississippi and is a teacher in the Grenada County Public School System.
3. Respondent earns approximately \$ 2,000.00 per month.
4. As primary caregiver for the children, Respondent's household expenses exceed \$ 1,000.00 per month.
5. Respondent has recently incurred additional unexpected expenses in the form of medical bills and costs associated with home repair totaling approximately \$ 500.00.
6. Defending against the baseless accusations of the Petition for Grandparent Visitation has resulted in financial hardship for the Respondent.

WHEREFORE, Respondent respectfully moves the Court to require, pursuant to the  
aforementioned statute, the Petitioners to pay Respondent's attorney fees and any costs she may  
have incurred.

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Austin G. Gray  
Attorney for Respondent  
P. O. Box 2287  
Oxford, MS 38655  
662-832-0428  
MS Bar No.103675

**CERTIFICATE OF SERVICE**

I, Austin Gray, attorney for Respondent Tonia Bailey, do hereby certify that I have this date hand delivered a copy of this Motion to Assess Attorney's Fees to:

Tommy W. Defer  
Counsel for Petitioners  
111 Calhoun Street  
Water Valley, Mississippi 38965

This the 23<sup>rd</sup> day of May, 2011.

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Austin G. Gray  
Attorney at Law  
P.O. Box 2287  
Oxford, MS 38655  
(662) 832 0428