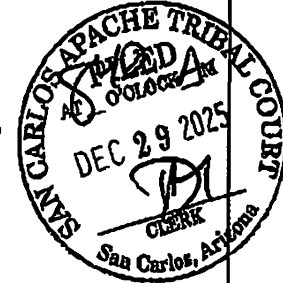


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IN THE SAN CARLOS APACHE TRIBAL COURT
SAN CARLOS APACHE INDIAN RESERVATION
SAN CARLOS, ARIZONA



SAN CARLOS APACHE TRIBE

Case No.:

Plaintiff,

Vs.

SHARON HUDSON,

MOTION TO PLACE CHILD WITH

Respondent

MOTHER

COMES NOW, Christy Hudson through defense Counsel hereby moves the Court to
dismiss the complaint do to due process violations, due to the following reason (s):

STATEMENT OF FACTS

On December 3, 2025 at approximately 0745 pm temporary custody order states, "child
has broken leg, has been using he bathroom on herself, child left home alone with guardian
Sharon who has dementia. Sharon reports that Christy takes off. Sharon stated that she didn't
know that child had broken leg. Sharon Hudson had been given custody of the child in a
previous hearing. In that hearing mother Christy Hudson had not been given due process, she
had not been given notice of any hearing regarding her daughter Gabrielle Snell there has been
no court order from the Juvenile Court regarding the previous hearings.

1
2 **MEMORANDUM OF LAW**

3 On December 3, 2025 child had been removed from Guardian Sharon Hudson, Child is
4 now in a group home in the Mesa Arizona area. Due process was not followed as maternal
5 family members had not been contacted to take in the child although CPS case worker had been
6 given a list of names from maternal family who could care of the child pursuant to CHAPTER
7

8 **III. CHILD WELFARE PROCEDURES:**

9 **Section 14. Restrictions on Placement of Children**

10 A. A child alleged to be neglected or abused shall not be detained in a jail or other facility
11 intended or used for the incarceration of adults charged with criminal offenses or for the
12 detention of children alleged to be juvenile offenders, but may be detained in the
13 following community – based shelter care locations:

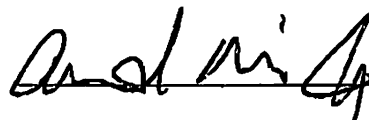
- 14 1. Relatives. First preference for placement shall be given to a relative of the child who
15 is willing to guarantee the Tribe's Social Services that the child will not be returned
16 to the alleged abusive or neglectful parent, guardian, or custodian without the prior
17 approval of the court, and in keeping with Apache tradition preference shall be given
18 to the child's maternal relatives, or;

19 The mother through Counsel moves Court to place child with her while the judicial
20 process runs its course.

21 **CONCLUSION**

22 THEREFORE, the Defendant motions the Court 1) To dismiss the complaint, 2) grant
23 motion to place child in mother's custody, 3) Grant any other relief the court deems just and
24 proper
25

Dated this 23rd day of December 2025



Allred Pike Jr