

CENTRAL AND FIFE AT DUNDEE

**MINUTE OF AMENDMENT FOR PURSUER  
(as Third Adjusted )**

*In causa*

PURSUER

Against

ARNOLD ROMAIN, Narbonne 1100, France

DEFENDER

XXXXX for the Pursuer moves the Court to allow the Record to be opened up and amended as follows:-

1. **Insert a new third crave for the Pursuer, and to renumber the existing craves accordingly:**

**“To grant a specific issue order in terms of section 11 of the Children (Scotland) Act 1995 entitling the Pursuer to apply for passports and, where appropriate, citizenship of the United Kingdom and Canada for the said children S and J and to grant such an order ad interim;”**

2. In Article 4 of Condescendence, at line 9, after the sentence ending “her”, insert:-  
“The Defender has not travelled to Scotland to exercise contact with the children since June 2017. On or around 13 June 2017, he emailed the Pursuer’s agents indicating that he did not intend to visit the girls in July and August. Copy of that email is produced herewith, referred to for its terms, and deemed to be incorporated herein *brevitatis causa*. He has asserted that he is medically unfit to travel to Scotland.”

3. At the end of article 7 of condescendence, insert:

**“The Pursuer seeks to secure the children’s continuing residence in the UK, post Brexit in 2019. It is in the best interests of the said children that an application is made on their behalfs to accord them the status of British citizens. It is in the best interests of the said children that they obtain UK passports. The Pursuer is of dual UK/Canadian nationality. It is in the best interests of the said children that they obtain similar citizenship, where possible, to their mother and primary carer. The Defender has been called upon to consent to such applications. He has not responded.”**

4. In article 8 of condescendence, on page 7 of the Record and at line 23, after the sentence ending “upon”, insert:

“The Defender has now commenced, in or around October 2017, an online petition querying the UK court system’s enforcement of the Hague Convention on International Child Abduction. The Defender’s actions contravene the Order from the Supreme Court, dated 12<sup>th</sup> May 2015 preventing publication or revelation of any information which would lead to the identification of the children or any member of their family. A copy of the said interlocutor is produced herewith, and is referred to for its terms, which are deemed to be incorporated herein *brevitatis causa*.”

5. In article 8 of condescendence, on page 7 of the Record and at line 33, after the sentence ending “conduct”, insert:

“The Defender has, as of October 2017, engaged in an online campaign in respect of his situation. He has published material on facebook and twitter criticising the Scottish judicial system. He has created a website at [www.mesfilles.fr](http://www.mesfilles.fr) publishing details of the dispute between the parties, and criticising the implementation of the law, as he sees it. Reference is made to excerpts from the said website, as well the facebook and

twitter postings made by the Defender, copies of which are produced herewith and referred to for their terms, and are deemed to be incorporated herein *brevitatis causa*.”

**6. Insert a new plea in law for the Pursuer:**

**“The specific issue orders craved being in the best interests of the said children, and it being better that orders are made than none are made, should be granted as craved.**

And to close the Record of new.

IN RESPECT WHEREOF