

**STATE OF MICHIGAN  
COURT OF APPEALS**

Tenisha Hampton,  
Plaintiff–Appellee,

v.

Gregory Charles Jones,  
Defendant–Appellant.

Court of Appeals No. \_\_\_\_\_  
Wayne Circuit Court, Family Division  
LC No. 17-163353-DP  
Hon. Yvonna C. Abraham

**EMERGENCY MOTION FOR IMMEDIATE STAY AND PROTECTIVE  
RELIEF**

NOW COMES Defendant–Appellant Gregory Charles Jones, appearing pro se, and for his Emergency Motion for Immediate Stay, states as follows:

**1. Nature of the Emergency**

This motion seeks an immediate stay of the Wayne County Circuit Court's December 1, 2025 Order Following Hearing, which:

- Suspends Defendant's parenting time;
- Authorizes law-enforcement officers to locate, seize, and transfer the minor child, Maryam Jones (DOB 03/XX/2013);
- Does so without addressing undisputed evidence that Maryam is currently enrolled in a Partial Hospitalization Program for suicidal ideation.

Absent an immediate stay, Maryam faces a substantial and imminent risk of serious bodily harm or death.

**2. Maryam Jones Is Medically Fragile and at Risk of Suicide**

Maryam Jones is presently receiving hospital-level psychiatric care due to suicidal ideation. Her treatment providers have determined that removal from her current safe placement would materially increase her risk of self-harm.

The trial court was on notice of Maryam's mental-health condition and the risk posed by forced removal, yet entered an order authorizing police retrieval without safeguards,

findings, or accommodations.

### **3. The Order Authorizes Irreversible Harm**

Once law enforcement executes the order: the child will be forcibly removed; trauma cannot be undone; the risk of suicide cannot be retroactively mitigated. Michigan courts recognize that child safety and preservation of life constitute irreparable harm warranting immediate appellate intervention.

### **4. Likelihood of Success on the Merits**

Defendant has raised substantial appellate issues, including: abuse of discretion for ignoring material mental-health evidence; violation of substantive due process, where the State knowingly exposes a child to a serious risk of harm; failure to make required best-interest and safety findings; violation of ADA Title II and Section 504, by failing to reasonably accommodate a known mental-health disability.

### **5. Public Interest**

The public interest is served by: protecting the life of a suicidal child; ensuring courts do not authorize police action that foreseeably endangers minors; upholding constitutional and disability-rights protections.

### **WHEREFORE, Defendant–Appellant respectfully requests that this Court:**

- A. Immediately STAY enforcement of the December 1, 2025 order;
- B. Prohibit any law-enforcement retrieval of Maryam Jones pending appeal;
- C. Preserve the status quo to protect the child's safety;
- D. Grant any other relief this Court deems just and proper.

Respectfully submitted,

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