

**טורס, ארנון ושות' – משרד עורכי דין וגישור**  
**TORRES, ARNON & Co. – LAW & MEDIATION OFFICE**

GAL TORRES, Advocate

גל טורס, עורכת-דין

RAN ARNON, Advocate

רן ארנון, עורך-דין

Date: 05/04/2011

Our Number: /113B

To whom it may concern,

**Re: Sharon Ben-Haim – Court Procedures in Israel**

The undersigned represents the abovementioned Mr. Sharon Ben-Haim for about 9 months in the legal proceedings initiated by Sharon, in court in Israel, in order to return his abducted daughter, Ofir Ben-Haim, to United States, according to 1991 Hague Convention Act (returning of abducted children) (hereinafter: "the Convention").

All throughout the time I have known Sharon I have witnessed the enormous love and dedication of Sharon towards his daughter, the concern he has for her well-being and his desire to continue living beside her, taking care of her and raising her by him, in United States, in the devotion and dedication he knows he can provide for her.

As soon as he had understood that his wife has no intention of returning to United States, Sharon has initiated legal proceedings according to the Convention, and as his wife refused to return to United States with their daughter, by consent of her own free will, I have filed a request for action to the Family Court in Nazareth in order to return the minor to United States according to the Convention's rules.

Simultaneously, Sharon has asked me to do everything I can to allow him to see his daughter, at least via Skype communication, urgently, so that his daughter will continue to recognize him and know him as her father, and also for him to be able to tell her how much he loves her and misses her. Furthermore, Sharon wanted his family in Israel to be able to keep in touch with his daughter and to meet her regularly.

I've contacted the wife's attorney and asked her to maintain consensual meetings between Sharon's family and the minor, and that the mother will also allow Skype communication between the daughter and her father, but my appeals were declined.

Under these circumstances I've immediately turned to court with a request to implement visitation rights according to the Convention, in order to establish regular and organized seeing arrangements, of no less than twice a week and one weekend every two weeks, between the minor and her

**טורס, ארנון ושות' – משרד עו"ד וגישור**

קניון הגליל העליון, ת.ד. 143, חצור הגלילית 10351, טלפון: 04-6860888, פקס: 04-6860890  
מושב ציפורי, ת.ד. 91, טלפון/פקס: 04-6463643

**TORRES, ARNON & Co. – LAW & MEDIATION OFFICE**

Upper Galilee Center, P.O.B 143, Hatzor Haglilit 10351, Tel: 04-6860888, Fax: 04-6860890  
Zippori, P.O.B. 91, Tel/Fax: 04-6463643

grandparents, the appellant's parents, in Migdal Ha'emek. I've also requested that current photographs of the minor will be delivered to Sharon immediately.

In the first court sitting, on September 15<sup>th</sup> 2010, I've demanded on Sharon's behalf that there will be a daily contact via Skype between him and his daughter, and so was agreed. Albeit that agreement, the mother did whatever she pleased regarding those conversations, sometimes didn't call at all while claiming the minor had fallen asleep, and at other times called very late at night. At some point the mother had started studying and one-sidedly decided to stop making those conversations during her school days.

Under these circumstances I've filed an additional request on Sharon's behalf to force the mother to maintain a regular contact, via Skype, on a daily basis, since this was the only way Sharon could see his daughter and maintain the so important relationship with her.

Despite the court's decision regarding the seeing arrangements via Skype, there have been many violations made by the mother and I've reported them to the court.

As far as I know, Sharon had impeccably kept all his Skype conversations with his daughter, even at the expense of working hours, and all throughout the legal process had told over and over again that all he cares about is seeing his daughter every single day.

When Sharon had decided to come to Israel to testify in his trial, I've filed an immediate request to settle the contact arrangements between him and his daughter every day, including sleepovers and including weekends.

The court accepted the request, and so Sharon had met his daughter on a daily basis, and as far as I know he had impeccably kept all of these meetings without missing a single day.

In addition, during the months in which Sharon stayed in Israel I've contacted the mother's representative and asked her to agree to lengthen Sharon's time with his daughter and also allow her to spend nights with him, but I've encountered refusal and inflexibility. Therefore I've appealed to court and requested to lengthen visitation hours and allow the minor to sleep at her father's house but the court kept the visits as they were.

As soon as Sharon returned to United States I've requested on his behalf to renew the contact via Skype since the mother had immediately disconnected the minor from Sharon's extended family, and did not allow her to meet her grandmother as she did every day while he was in Israel. But unfortunately the court still hadn't decided on the matter. I know that the fact that the court hadn't decided yet and the difficult separation from his daughter since they don't communicate via Skype, weigh heavily on Sharon and every day he wishes to know if the court had decided yet in a manner that will allow him to again see his daughter who was abducted from him against the law.

I can say without any hesitation, that throughout the months in which I represent Sharon, he has exhibited a warm and loving relationship with his daughter, concern and care for everything she does and everything she goes through, and hasn't ceased for a moment to ask me to do everything I can, in court, in order to broaden and strengthen his contact arrangements with Ofir.

**GAL TORRES, Advocate**