# Court of Appeals, State of Michigan

## ORDER

JESSICA RAE BROWN V DUSTIN HAMER

Docket No. 379727

LC No. 15-006954-DS

Stephen L. Borrello
Presiding Judge

Michael J. Riordan

Daniel S. Korobkin
Judges

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The motion for immediate consideration is GRANTED.

Pursuant to MCR 7.211(C)(4) and MCR 7.205(E)(2), and in lieu of granting the application for leave to appeal, we PEREMPTORILY REVERSE the March 2, 2026 order of the trial court to the extent that the court attempted to retain jurisdiction over a portion of this child custody proceeding and to the extent that the court modified an existing parenting time order in a matter over which it determined it no longer possessed exclusive, continuing jurisdiction. After the court determined that it no longer had exclusive, continuing jurisdiction and after the court determined that it should transfer this matter to another state, see MCL 722.1202; MCL 722.1207, the court could not exercise jurisdiction over a part of this case. The court's bifurcation of the proceedings in this manner was not authorized by the Uniform Child-Custody Jurisdiction and Enforcement Act (UCCJEA), and it was contrary to the UCCJEA's goal of preventing the entry of conflicting orders or proceedings in custody matters. See *White v Harrison-White*, 280 Mich App 383, 388; 760 NW2d 691 (2008). Moreover, defendant's voluntary participation in mediation did not waive jurisdiction, in whole or in part, over the enforcement of the order that resulted from mediation. See *Foster v Wolkowitz*, 486 Mich 356, 367; 785 NW2d 59 (2010). On remand, the court shall transfer the entirety of this matter to South Carolina.

Presiding Judge

A true copy entered and certified by Jerome W. Zimmer Jr., Chief Clerk, on

April 16, 2026
Date

Chief Clerk