

ATTORNEY Bar #(0000)

(Form provided courtesy of Lokken & Assoc.)

FIRM NAME

Attorneys for CLIENT

Street Address

City, State Zip

Telephone: (000) 000-0000

Facsimile: (000) 000-0000

IN THE THIRD JUDICIAL DISTRICT JUVENILE COURT

IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

THE STATE OF UTAH, in the
interest of:

)
)
)
)
)
)
)
)
)
)

**MOTION FOR TRIAL HOME
PLACEMENT WITH SUPPORTING
MEMORANDUM**

CHILD (00/00/00)

Case #

A person(s) under the age
of eighteen years.

JUDGE

COMES NOW, Respondent, CLIENT, through counsel, ATTORNEY of FIRM, and hereby moves this court for an order allowing a trial home placement of the above named minor child with her natural mother CLIENT. Respondent submits the following memorandum in support of her motion:

FACTS

1. This matter came on for hearing on November 3, 2000, pursuant to a motion filed by the Guardian ad Litem.

2. At that hearing, it was brought to the court's attention that the minor child, contrary to the understanding of the court, had been residing with a "mystery family," rather than with AUNT and UNCLE the maternal aunt and uncle.
3. Respondent had no knowledge of this placement with an outside family and was under the impression that her daughter was in the care of the maternal aunt AUNT.
4. At hearing, on October 2, 2000, all parties agreed to a change in custody to the maternal grandmother, in an effort toward reunification with the Respondent. It was represented that Respondent had difficulty getting along with her sister and the visit would be much more amicable if there were to take place and the Grandmother's home.
5. Shortly, after that hearing, Respondent's counsel was contacted by the Guardian ad Litem. It was represented that the minor child had in fact not been residing with the maternal aunt AUNT. This was the first that any parties, other than Petitioner, had learned of where CHILD was living. Needless to say, this was extremely upsetting to Respondent. Respondent has no idea who the individuals are that CHILD had been residing.

ARGUMENT

1. Respondent has remedied the situation that lead to the out of home placement of her daughter.
2. Respondent is a participant in the Third District Drug Court Program.

Respondent is compliant with this program. (See, Exhibit 1: Letter from WITNESS, Case Manager)

3. Respondent is attending and actively participating in a Substance Abuse Group since August 15, 2000. (See, Exhibit 2: Letter from WITNESS L.C.S.W.)
4. Respondent has been completing random urinalysis tests which have all been negative since May 2000. (See, Exhibit 3: UA Results).
5. Respondent is attending and actively participating in a Parenting Class through Project Reality. Also, noteworthy is that her paramour has also been attending the parenting class with Respondent. (See, Exhibit 4: Letter from WITNESS, Project Reality).
6. Respondent has been employed at CommComm since June 5, 2000 and has obtained family insurance coverage through her employer. (See, Exhibit 5: Letter from Employer). Respondent is paid at the rate of \$9.50 hour. (See, Exhibit 6: Pay Check Receipt).
7. Respondent has suitable housing for herself and her daughter. Respondent resides in a home with adequate space for herself and her daughter. Her daughter would be provided her own room. (See, Exhibit 7: Letter from WITNESS).

WHEREFORE, Respondent respectfully requests that this court order and period of trial home placement for the benefit of Respondent and her minor child.

DATED this _____ day of November, 2000.

ATTORNEY
FIRM
Attorneys for CLIENT

CERTIFICATE OF MAILING

I hereby certify that on this ____ day of _____, 2000, I faxed and mailed, postage prepaid, a true and correct copy of the foregoing Motion for Trial Home Placement to:

GUARDIAN AD LITEM
