

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

, AND , AS NEXT FRIENDS AND ON THE BEHALF OF , A MINOR

VS.

MOTION FOR EMERGENCY HEARING

Comes now , Defendant, by and through his/her attorney and moves this Honorable Court for an emergency hearing in this matter and for support thereof would show the following:

1.

That this case was set for a hearing and continued until , , .

2.

That the Plaintiff, was ordered in the Judgment of Divorce to keep health insurance on the minor child, .

3.

That since there is currently no health insurance coverage on the minor child, , on this medical problem, he/she cannot be admitted to without the payment of thirty (30) days in advance and each month's bill paid on or before the of the month.

4.

That will take a minimum of ninety (90) days to determine coverage, if not more, with no guaranty of coverage by .

5.

That the minor child, , will destabilize and regress without immediate treatment at .

6.

That the father/mother, , Plaintiff, should be order to pay immediately the cost of entering the minor child, , into and pay each month's expenses as accrued until accepts coverage.

WHEREFORE, PREMISES CONSIDERED, Defendant prays for an emergency hearing in this matter.

Respectfully submitted,

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Attorney for

Of counsel:

Telephone:  
MSB #  
Attorney for