

IN THE FAMILY COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

In Re the Marriage of)
)
JOHN A. DOE,)
SS# xxx-xx-6789)
)
Petitioner,) Cause No. 13SL-DR009876
)
and)
) Division No. 85
JANE A. DOE,)
SS# xxx-xx-4321)
)
Respondent.)
)

RESPONDENT’S MOTION FOR CUSTODY EVALUATION

COMES NOW Jane A. Doe, Respondent, through counsel, and for her Motion for Custody Evaluation pursuant to Supreme Court Rule 60.01 states as follows:

1. That there is currently pending Petitioner’s Petition for Dissolution of Marriage and Respondent’s Counter-Petition for Dissolution of Marriage.
2. Among the issues to be resolved is that of custody of the parties’ minor children: Susie A. Doe, age 8; and Adam A. Doe, age 3.
3. That there are complex issues related to the custody and visitation schedule, as well as allegations having been made by each party regarding the other that may affect the custody schedule to be observed by the parties. Such allegations include but are not limited to the diagnosis of one child, Susie Doe, as having Attention Deficit Hyperactivity Disorder.

4. A custody evaluation would provide significant guidance to the Court and the parties as to what is in the best interests of the minor children with respect to their custody.

Wherefore, Respondent prays that this Court enter an order, ordering Petitioner, Respondent and the minor children to submit to and participate in a custody evaluation to be conducted by an evaluator selected by the Court in consultation with the attorneys for the parties; and for such other and further orders as to this court seem just and proper in the premises.

Respectfully submitted,

BAUER SOULE GARNHOLZ ALBIN
ATTORNEYS & COUNSELORS AT LAW

BY: _____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been mailed first class, postage prepaid, via United States Postal Service this ____ day of _____, 2013, to:

Suzy Q. Lawyer
Attorney for Petitioner
5698 Maple, 12th Floor
St. Louis, Missouri 63105

_____ If checked here, also via facsimile number (314) 666-6666
Date: _____ Time: _____
