

[REDACTED]
[REDACTED]
Attorneys for Respondent
[REDACTED]

IN THE [REDACTED] COURT OF THE [REDACTED] CIRCUIT
STATE OF [REDACTED]

[REDACTED]
Petitioner,

vs.

[REDACTED],
Respondent.

[REDACTED]
Respondent's Reply and Opposition to
"MOTION FOR APPOINTMENT OF A
GUARDIAN AD LITEM" [REDACTED] and
"MOTION FOR (1) MENTAL EXAMINATION
OF RESPONDENT, (2) APPOINTMENT OF
CUSTODY EVALUATOR, AND (3)
CONTINUANCE OF EVIDENTIARY
HEARING" ([REDACTED]); Declaration of Counsel;
Exhibits A-G; Certificate of Service

Date: [REDACTED]
Judge: [REDACTED]

RESPONDENT'S REPLY AND OPPOSITION TO "MOTION FOR APPOINTMENT OF A
GUARDIAN AD LITEM" ([REDACTED]) AND "MOTION FOR (1) MENTAL EXAMINATION OF
RESPONDENT, (2) APPOINTMENT OF CUSTODY EVALUATOR, AND (3)
CONTINUANCE OF EVIDENTIARY HEARING" ([REDACTED])

Respondent [REDACTED] ("Respondent" or "Mother"), by and through
counsel undersigned, hereby replies in opposition to the "MOTION FOR
APPOINTMENT OF A GUARDIAN AD LITEM" ([REDACTED]) and "MOTION FOR (1)
MENTAL EXAMINATION OF RESPONDENT, (2) APPOINTMENT OF CUSTODY

EVALUATOR, AND (3) CONTINUANCE OF EVIDENTIARY HEARING" (), as follows:

1. Exhibit A shows that all of the show that Mother is an attentive and loving parent and there are NO parenting concerns for Mother or Mother's home.
2. Exhibit B shows that all of the show that Mother is an attentive and loving parent and that there are NO parenting concerns for Mother.
3. Exhibit C shows that Mother because she was determined to not be a danger to herself or others.
4. Exhibit D shows that Mother promptly followed up with her primary care provider the day after .
5. Exhibit E shows that Mother continued to follow up with her primary care provider after .
6. Exhibit F shows that Mother has regularly followed up with her personal therapist, , and that has concluded that Mother is not a danger to herself or others, and that she has the necessary skills to lovingly and competently parent her daughters.
7. In addition, I have communicated with the coparenting therapist selected by Petitioner ("Petitioner" or "Father"). has verified that Mother has cooperated with requests and recommendations and that does not have an objection to Mother having unsupervised time to care for her daughters.

As shown in the material supporting this reply and opposition, there is no factual basis for any of the foregoing requests. Mother has followed the recommendations of the treating professionals, including the co-parenting counselor selected by Father, and her own treating professionals and all have concluded that she is not a danger to herself or others. Mother has had numerous supervised visits and there are absolutely no concerns regarding her parenting abilities, her home, or her ability to provide a safe home. To the contrary, there is ample evidence that Mother is a capable and loving parent who is in good mental health and whose home is a healthy and safe place for her daughters to reside.

Second, Father waived these requests when he agreed to set the matter for evidentiary hearing. This matter came for initial hearing on [REDACTED]. At that time Father did not make any of the foregoing requests. Since that time, Mother has cooperated with the co-parenting counselor selected by Father and there have been ample supervised visits. The counseling and visits have not provided any basis for new concerns. Therefore, there is no legitimate basis to make these requests at this time. To the contrary, the only basis for these requests is a bad faith attempt to delay the proceedings.

Third, there are no funds to pay for any of these services. On [REDACTED] Father claimed that he could not afford to pay for half of the costs of the supervised visits. The experts that Father is now requesting are far more expensive than the cost of the supervised visits. If Father has the funds for these experts, he should be paying for at least half of the costs of the supervised visits.

For the foregoing reasons, Father's untimely requests should be denied. In the alternative, Mother renews her request to reinstate the previously ordered visitation schedule or, at a minimum, award Mother ample unsupervised visitation.

DATED: [REDACTED].

[REDACTED]

[REDACTED]

Attorneys for Respondent

[REDACTED]

IN THE [REDACTED] COURT OF THE [REDACTED] CIRCUIT
STATE OF [REDACTED]

[REDACTED],
Petitioner,

vs.

[REDACTED],
Respondent.

[REDACTED]

Declaration of Counsel; Exhibits A-F

DECLARATION OF COUNSEL

1. I, [REDACTED], am a lawyer licensed and in good standing in the State of [REDACTED].
2. Through [REDACTED], I am counsel for Respondent [REDACTED].
3. I have reviewed the records and files in this matter, interviewed witnesses, and reviewed Petitioner's and Respondent's exhibits as part of trial preparation in this matter. Based on the foregoing, I am informed and of the belief as follows:
4. Attached as Exhibit A is a true and correct copy of the records we've received from [REDACTED].
5. Attached as Exhibit B is a true and correct copy of the records we've received from [REDACTED].
6. Attached as Exhibit C is a true and correct copy of the discharge notes from [REDACTED] [REDACTED] after Respondent's stay.
7. Attached as Exhibit D is a true and correct copy of the records from Mother's phone visit with her doctor the day after her stay at [REDACTED].
8. Attached as Exhibit E is a true and correct copy of the records from Mother's two follow-up visits with her doctor following her stay at [REDACTED].

9. Attached as Exhibit F is a true and correct copy of a letter from Mother's therapist, [REDACTED].

10. In addition, I have communicated with [REDACTED], the coparenting therapist selected by Petitioner [REDACTED] ("Petitioner" or "Father") via phone and email. [REDACTED] has verified that Mother has cooperated with [REDACTED] requests and recommendations and that [REDACTED] does not have an objection to Mother having unsupervised time to care for her daughters

11. I declare under penalty of law that the foregoing is true to the best of my knowledge and belief.

DATED: [REDACTED] [REDACTED].

[REDACTED]

IN THE [REDACTED] COURT OF THE [REDACTED] CIRCUIT
STATE OF [REDACTED]

[REDACTED],
Petitioner,

vs.

[REDACTED],
Respondent.

[REDACTED]

Certificate of Service

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, a true and correct copy of the foregoing was
duly served upon the following party via [REDACTED] on the
date indicated:

[REDACTED]
Attorney for Petitioner

DATED: [REDACTED]

[REDACTED]

[REDACTED]

Attorneys for Respondent

[REDACTED]