

COPY

<p>DISTRICT COURT, EL PASO COUNTY, COLORADO Court Address: 20 East Vermijo Colorado Springs, CO 80903 719-448-7650 Mailing Address: P.O. Box 2980 Colorado Springs, CO 80901-2980</p> <hr/> <p>Petitioner: FRANCIS M. GALE</p> <p>Respondent: LEONARD GRIFFEN</p> <hr/> <p>Thomas A. Davis, III, Attorney for Respondent 405 S. Cascade Avenue, Suite 102 Colorado Springs, CO 80903 Phone Number: (719) 632-6644 Fax Number: (719) 632 - 6234 Atty. Reg. #: 23563</p>	<p>FILED IN THE DISTRICT AND COUNTY COURTS OF EL PASO COUNTY, COLORADO</p> <p>JUL 22 2004</p> <p>LEE V. COLE, JR. CLERK OF COURT</p> <p>▲ COURT USE ONLY ▲</p> <hr/> <p>CASE NO.: 98 DR 504</p> <p>DIVISION: R</p>
<p>MOTION FOR FORTHWITH HEARING ON PARENTING TIME AND RESPONDENT'S MOTION FOR APPOINTMENT OF SPECIAL ADVOCATE</p>	

COMES NOW the Respondent, Leonard Griffen, by and through her attorney, Thomas A. Davis, III, and respectfully requests a forthwith hearing on the issue of parenting time for the Respondent, and in support thereof states as follows:

1. That on or about June 14, 2004 the Respondent filed with the Clerk of Court a Motion to Modify Parenting Time.
2. That on June 28, 2004 this Court entered an Emergency Order in connection with the Verified Motion filed by the *pro se* Petitioner ordering that the Respondent have no contact with his seven (7) year old son.
3. That Respondent was not permitted to be heard on the allegations raised in the *pro se* Petitioner's Verified Motion.
4. That it is not in the best interests of the minor child to have no contact with the Respondent father.
5. That on or about July 2, 2004 the Petitioner, by and through her attorney, Robert S. Fisher, filed a Response to Respondent's Motion to Modify Parenting Time which, *inter alia*, alleges that,

In the interim, all parenting time between the Respondent and James [the minor child] should be supervised by an unrelated third party deemed suitable by the court or by a licensed mental health professional

6. That notwithstanding the unsubstantiated allegations set forth in the Petitioner's VERIFIED CONSOLIDATED RESPONSE TO MOTION TO MODIFY PARENTING TIME, AND MOTION TO RESTRICT FUTURE PARENTING TIME, there is no evidence before the Court that would necessitate supervised parenting time.
7. That Respondent father has filed with the Clerk of Court a MOTION FOR APPOINTMENT OF SPECIAL ADVOCATE and a proposed Order Appointing Special Advocate that the Respondent believes should be granted and ordered to address the outstanding issues concerning parenting

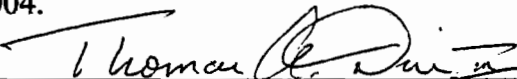
time.

WHEREFORE Respondent, by and through his attorney, respectfully requests this honorable Court to enter an Order with regard to parenting time, as the Court deems reasonable, proper, and in the best interests of the minor child; and,

FURTHER adopting and entering the Respondent's proposed Order Appointing Special Advocate; and,

FOR SUCH FURTHER and other relief as this Court deem reasonable and proper.

Respectfully submitted this 22nd day of July, 2004.



Thomas A. Davis, III, # 23563
Attorney for Respondent

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the foregoing MOTION FOR FORTHWITH HEARING ON PARENTING TIME AND RESPONDENT'S MOTION FOR APPOINTMENT OF SPECIAL ADVOCATE was placed in the United States Mail, postage prepaid, on the 22nd day of July, 2004, addressed to the following:

Robert S. Fisher, Esq.
924 North Wahsatch
Colorado Springs, CO 80903