

**COPY**

El Paso County, Colorado District Court Court Address: 20 East Vermijo Avenue Colorado Springs, CO 80903 Phone Number: (719)448-7650	<b>FILED</b> DISTRICT/COUNTY COURT EL PASO COUNTY COLORADO 04 JUN 14 PM 2:32
In Re the Parenting Time of James Glen Griffin, Minor Child  Petitioner: <b>Frances M. Gale</b>  v. Respondent/Co-Petitioner: <b>Leonard J. Griffin</b>	LEE V. COLE, JR. CLERK OF COURT  <b>COURT USE ONLY</b>
Attorney or Party Without Attorney (Name and Address):  Phone Number: _____ E-mail: _____ FAX Number: _____ Atty. Reg. #: _____	Case Number: 98 DR 504  Division 6 Courtroom
<b>MOTION TO: MODIFY PARENTING TIME</b>	

Petitioner  Respondent/Co-Petitioner (check one) requests that this Court enter its order modifying the parenting time schedule as requested below.

1. The last order regarding parenting time was entered by the Court on (date): July 2002
2. No motion to modify parenting time has been filed in the last two years.
3. The parties have 1 minor child(ren):

<u>Name</u>	<u>Sex</u>	<u>Date of Birth</u>
James Glen Griffin	Male	1-14-1997

4.  Petitioner  Respondent/Co-Petitioner (check one) now has parenting time with the minor child(ren) under the following schedule and under the following conditions (if any):  
Every other weekend Friday at 6:00pm to Sunday at 4:00pm with curbside drop off by mother to 1302 Monteagle St. C/S, CO 80909 on Friday and Father to return curbside to 4725 Artistic Cir. C/S, CO 80917. Half of every holiday. This is current for the last three years.
5. I am asking the Court to change the current parenting time order to provide for the following new parenting time schedule:  
For the First, Second and Fourth weekends of every month, Friday at 6:00pm to Sunday at 4:00pm with curbside drop off by Mother to 1302 Monteagle St. C/S, CO 80909 and Father to return curbside to 4725 Artistic Cir. C/S, CO 80917. For the summer schedule the child shall stay in Father's (respondent) care for the entire month of June with no interruptions other than telephone conversation. Half of all school vacations that occur during the school year will be spent with the Father (respondent). The holiday schedule shall remain the same as half of all holidays be spent with both parties. Parties will make prior arrangements no later than one week before each holiday.

6. I believe that the modification of the current parenting time order I am requesting is in the best interests of the minor child(ren) for reason(s) which were unknown to the Court, or that have arisen since the last order. They are:

The child is currently Seven years of age and it is in the best interest for the minor child to spend more time with his Father as his age increases. There is some concern for the minor child to seek therapy by the Mother (petitioner) for allegedly trying to hurt himself, but after months of careful watching, the Father (respondent) can see none of these allegations. Again it is in the best interest of the minor child that the Father (respondent) be able to have more than just four days a month to observe the minor child's actions. It has been asked many times to the Father (respondent) by the minor child if he could come to visit more and even if he could move in to the Fathers (respondent) home. I, the Respondent in this case have tried many many times to present orders or just, plain, more visitation time to the Mother (petitioner) but it seems that we can come to no agreement in writing. At this time it again is in the best interest for the minor child for the court to intervene and make a ruling so that the minor child be allowed to spend more time with the Father (respondent).

7.  (Check only if applicable.) **THE CHILD(REN) IS IN IMMEDIATE EMOTIONAL OR PHYSICAL DANGER DUE TO THE CURRENT PARENTING TIME AND:**

Parenting time should only be conducted under supervision until the hearing.

This hearing should be held on an emergency basis.

8. REQUIRED NOTICE OF PRIOR RESTRAINING ORDERS.

Have any Temporary or Permanent Restraining Orders to prevent domestic abuse or any Criminal Restraining Orders or Emergency Protection Orders been issued against either party by any Court within two years prior to the filing of this motion?

No  Yes If your answer was yes, complete the following:

The Restraining Order was  Temporary  Permanent and issued against \_\_\_\_\_ in the County of \_\_\_\_\_, State of \_\_\_\_\_, in case number \_\_\_\_\_.

What was the subject matter of the Restraining Order or Emergency Protection Order?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I request that this Court enter an order modifying the parenting time schedule for the  Petitioner  Respondent/Co-Petitioner as described above.

Dated: June 14, 2002

Leonard J. Griffin

Petitioner OR  Respondent/Co-Petitioner

1302 Monteagle St.  
Address

Colorado Springs, Colorado 80909  
City, State, Zip Code

719.499.5882  
(Area Code) Telephone Number (home and work)