**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**

**FAMILY COURT**

**JUVENILE AND NEGLECT BRANCH**

  **)**

**In the Matter of: ) GDN NO: [YEAR] GDN [XXX]**

 **) NEG CASE NO. [CASE NUMBER]**

 **) SF NO. [SOCIAL FILE NUMBER]**

 **[CHILD], ) X-REF NO. [X-REF NUMBER]**

 **)**

 **) Magistrate Judge [JUDGE]**

 **)**

**Respondent. ) Next Date: [DATE] at [TIME]**

 **)**

# **Foster parents’ MOTION for party status**

 Foster parents and maternal uncle and aunt, [UNCLE] and [AUNT] (“Mr. and Mrs. [UNCLE] and [AUNT]”), through their counsel, [ATTORNEY] of [FIRM], hereby request that they be made a party to the above-captioned proceedings. [AAG], on behalf of the office of the Attorney General, and [GAL], the Guardian *ad litem,* have consented to the motion for party status. Birth mother and father, through their counsel [ATTORNEY] and [ATTORNEY] respectively, have taken no position. In support of the motion, [UNCLE] and [AUNT] respectfully refer the court to the accompanying memorandum of points and authorities.

 Respectfully submitted,

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

 [PETITIONER ATTORNEY]

 D.C. Bar No. [\_\_\_\_\_\_\_\_\_\_\_]

 [ADDRESS]

 [PHONE]

 [EMAIL]

 *Counsel for [UNCLE] and [AUNT]*

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**

**FAMILY COURT**

**JUVENILE AND NEGLECT BRANCH**

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 )

**In the Matter of** ) Case No. [YEAR] NEG [XXXXXX]

 )

 [CHILD], ) Social File No. [YEAR] JSF [XXXXXX]

 )

 **Respondent.** ) Next Date: [DATE]

 ) ) Magistrate Judge [NAME]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

## MEMORANDUM OF POINTS AND AUTHORITIES IN

## SUPPORT OF FOSTER PARENTS’ MOTION FOR PARTY STATUS

##

## The respondent, [CHILD] (“[CHILD]”), is [AGE] and has resided with [HIS/HER] maternal uncle and aunt, [UNCLE] and [AUNT], since [MONTH YEAR].

## Pursuant to D.C. Code § 16-2304 (b)(4)(B), a foster parent or other person with whom the child has been living for at least 12 months shall, upon request, be granted party status. A foster parent or other person with whom the child has been living for less than 12 months may be granted party status if the judicial officer finds that the interests of the child would be furthered by the participation of such person in the proceeding.

1. [CHILD]has lived with [UNCLE] and [AUNT]for [over 12 months *OR* amount of time]. They are [HIS/HER] caregivers and are seeking permanency with [HIM/HER]. It would further [CHILD]’s interests for [UNCLE] and [AUNT]to participate in permanency planning for [HIM/HER] and to have access to [HIS/HER] full medical and social history. Additionally, undersigned counsel requires access to the above-captioned proceedings in order to prepare for counseling clients about permanency options and to prepare for trial. All other parties have access to the file and it would be prejudicial to [UNCLE] and [AUNT]to not have access while going forward with permanency planning. Therefore, [UNCLE] and [AUNT]ask the court designate them as a party to the above-captioned proceedings.

WHEREFORE, [UNCLE] and [AUNT]respectfully request that the court approve the relief sought herein by granting the motion for party status, and award such other and further relief as the court finds just and proper.

 Respectfully submitted,

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

 [PETITIONER ATTORNEY]

 D.C. Bar No. [\_\_\_\_\_\_\_\_\_\_\_]

 [ADDRESS]

 [PHONE]

 [EMAIL]

 *Counsel for [UNCLE] and [AUNT]*

**Certificate of Service**

 I hereby certify that true and correct copies of the foregoing motion were served via first-class mail, postage pre-paid, upon the following individuals on this \_\_\_\_ day of [MONTH] [YEAR]:

[AAG NAME], Esq.

Assistant Attorney General

200 I Street S.E.

Washington, D.C. 20003

[SOCIAL WORKER NAME], Ongoing Social Worker

Child and Family Services Agency

200 I Street S.E.

Washington, D.C. 20003

[GAL NAME], Esq.

[ADDRESS]

[PHONE/FAX]

[EMAIL]

Guardian *ad Litem*

[ATTY NAME], Esq.

[ADDRESS]

*Counsel for Mother*

[ATTY NAME], Esq.

[ADDRESS]

*Counsel for Father*

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**

**FAMILY COURT**

**JUVENILE AND NEGLECT BRANCH**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

 )

**In the Matter of** ) Case No. [YEAR] NEG [XXXXXX]

 )

 [CHILD], ) Social File No. [YEAR] JSF [XXXXXX]

 )

 **Respondent.** ) Next Date: [DATE]

 ) ) Magistrate Judge [NAME]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

# **Order**

**UPON CONSIDERATION** of foster parents and maternal aunt and uncle, [UNCLE] and [AUNT]’s motion for party status; and the entire record herein;

**IT IS HEREBY ORDERED** THIS \_\_\_ DAY OF [MONTH] [YEAR] that [UNCLE] and [AUNT] are designated parties to the above-captioned neglect proceedings involving respondent [CHILD].

SO ORDERED.

Magistrate Judge [JUDGE]

Signed in Chambers

**Copies to**

[ATTY NAME], Esq.

[ADDRESS]

*Counsel for [UNCLE] and [AUNT]*

[AAG NAME], Esq.

Assistant Attorney General

200 I Street S.E.

Washington, D.C. 20003

[SOCIAL WORKER NAME], Ongoing Social Worker

Child and Family Services Agency

200 I Street S.E.

Washington, D.C. 20003

[GAL NAME], Esq.

[ADDRESS]

[PHONE/FAX]

[EMAIL]

Guardian *ad Litem*

[ATTY NAME], Esq.

[ADDRESS]

*Counsel for Mother*

[ATTY NAME], Esq.

[ADDRESS]

*Counsel for Father*