DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : AUGUST \_\_, 20

**PLAINTIFF’S MOTION TO FOR MODIFICATION, PENDENTE LITE/POST-JUDGMENT**

The Plaintiff in the above-captioned matter hereby moves to modify the Court’s orders set forth in the ***Agreement/Court Order***, dated ***insert date*** at entry number ***insert Entry Number***, and the ***Agreement/Court Order***, dated ***insert date*** at entry number ***insert Entry Number***. In support hereof, the Plaintiff sets forth as follows:

1. Paragraph 3.5 of the Agreement dated May 5, 20\_\_ (Pleading # \_\_\_\_) states…
2. Paragraph 4.5 of the Court Order dated July 15, 20\_\_ (Pleading # \_\_\_\_) states…
3. Since the entry of the aforementioned Court Orders, there have been material and substantial changes in circumstances as follows:
	1. The Plaintiff has lost his job and therefore his income has decreased.
	2. The Defendant’s income has increased.
	3. The minor child has not been doing well in school, and her mental health has been declining while in the custody of the Plaintiff.
	4. It is in the best interest of the child to remain primarily with the Defendant.

WHEREFORE, based on the foregoing the Plaintiff respectfully moves that the Court:

1. Modify the parenting plan so that the child resides primarily with the Defendant.
2. Modify the current legal custody orders so that the Defendant has sole legal custody, or at least final decision-making.
3. Decrease the present child support obligations of the Plaintiff.
4. Any further Order that the Court deems fair and equitable.

THE PLAINTIFF

 JOHN DOE

 By: 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510

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**ORDER FOR HEARING AND NOTICE**

 The foregoing motion having been presented to this Court, it is hereby ordered that the Plaintiff/Defendant, ***insert name***, appear before a session of this Court to be held within and for the Judicial District of \_\_\_\_\_\_\_\_\_, at \_\_\_\_\_\_\_\_\_\_\_ Superior Court, ***insert address of court***, on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, and then and there to show cause why the relief requested in the attached motion and the prayers contained therein should not be granted.

 Now therefore, by the authority of the State of Connecticut, you are hereby commanded to give notice of the pendency of the motion and this order to the Defendant and summon the Defendant to appear at the time and place of the hearing for the purposes above stated by leaving a true and attested copy of the motion, and this order with the Defendant, at least 12 days before the date of the hearing.

 Hereof fail not due service and return make.

 Dated at New Haven, CT, this \_\_\_ day of \_\_\_\_\_\_\_\_, \_\_\_\_\_\_.

 BY THE COURT,

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

CERTIFICATE OF SERVICE

 I hereby certify that a copy of the foregoing was electronically sent to the following counsel of record on this \_\_ day of \_\_\_\_\_\_, 20\_\_:

**Insert contact info for all parties of record here (except yourself)**

 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510