DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : AUGUST \_\_, 20

**PLAINTIFF’S MOTION FOR ORDER, PENDENTE LITE**

**RE: DRUG AND ALCOHOL TETING**

 Pursuant to Practice Book Section 25-24, the Plaintiff hereby moves the court for orders mandating that the Defendant undergo drug and alcohol testing, pendente lite. In support thereof, the Plaintiff represents as follows:

1. There is one minor child issue of the parties’ marriage.

2. The Defendant has a history of illicit drug usage.

3. The Defendant has a history of alcohol abuse.

4. Upon information and belief, the Defendant drinks to the point of intoxication several times per week. During said times, the Defendant also uses illicit drugs.

5. The Plaintiff has witnessed the Defendant on several occasions drinking throughout the evening and continuing into the following days and/or weeks.

6. The Plaintiff has also found evidence of illicit drugs in the marital home.

7. It is in the best interests of the minor child that the Defendant be ordered to undergo random drug and alcohol testing, pendente lite, as a condition of the Court granting the Defendant visitation with the parties’ minor child.

**WHEREFORE,** the Plaintiff respectfully requests that the Court:

1. Order the Defendant to undergo drug testing, pendente lite;
2. Order the Defendant to undergo alcohol testing, pendente lite;

3. Order the Defendant to undergo a substance abuse and alcohol evaluation;

4. Grant the Plaintiff any further relief that the Court deems just and equitable.

THE PLAINTIFF

 JOHN DOE

 By: 433848

 Matthew F. Dolan

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 129 Whitney Avenue

 New Haven, CT 06510

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)**

 433848

 Matthew F. Dolan

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