DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : DECEMBER \_\_, 20

**PLAINTIFF’S MOTION FOR THE COURT TO DECLINE CHILD CUSTODY JURISDICTION DUE TO INCONVENIENT FORUM, PENDENTE LITE/POST-JUDGMENT**

Pursuant to Connecticut General Statutes section 46b-115q, the Plaintiff in the above-captioned matter hereby moves the Court to decline to exercise jurisdiction over custody of the minor child(ren) (***insert names and DOB’s)***: In support thereof, the Plaintiff represents as follows

* 1. ***Insert jurisdictional background and explanation for why you are asking the court to decline jurisdiction.***

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

1. Decline to exercise jurisdiction over the minor child(ren), with a determination that ***insert state*** is a more appropriate forum to determine custody of the child(ren).
2. Stay the current child custody proceedings until one of the parties commences a proceeding in ***insert state***.
3. Any further Order that the Court deems fair and equitable.

THE PLAINTIFF

 JOHN DOE

 By: 433848

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510

DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : AUGUST \_\_, 20

**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 Plaintiff/Defendant and summon the Plaintiff/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 Plaintiff/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)**

 433848

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510