

Good Client
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Petitioner Pro Se

IN THE FOURTH JUDICIAL DISTRICT COURT
IN AND FOR THE COUNTY OF UTAH, STATE OF UTAH

GOOD CLIENT,

Petitioner,

vs.

OPPOSING PARTY,

Respondent.

**OBJECTION TO RESPONDENT'S
PROPOSED PARENTAGE DECREE AND
JUDGMENT**

Case No. 123456789

Judge: Lund

Commissioner: Petersen

Petitioner, Good Client (hereinafter referred to as “Petitioner” or “Mr. Client”), proceeding in this matter *pro se*, hereby files this “Objection to Respondent's Proposed Parentage Decree and Judgment” (hereinafter referred to as this “Objection”), pursuant to Rule 7(j)(4) of the Utah Rules of Civil Procedure, and against the above-captioned Respondent, Opposing Party (hereinafter referred to as “Respondent” or “Ms. Party), and in contemplation of the best interest of the parties’ minor child in this matter, whose initials are J.I.S. (who will be referred to as “J.I.S.” throughout this Objection). In support of this Objection, Petitioner objects, states, and alleges as follows:

OBJECTION NO. 1

1. Rule 7(j)(2) of the Utah Rules of Civil Procedure states, in part, that “a party must serve the proposed order on the other parties for review and approval as to form.” However, Respondent never served her “Proposed Parentage Decree and Judgment” (hereinafter referred to

as the “Proposed Order”), neither before nor after filing, upon Petitioner for review and approval as to form and substance. Petitioner was never served notice of the Proposed Order or sent a copy of it by Respondent. Respondent never even mentioned to Petitioner at all that she had filed the Proposed Order. Petitioner obtained a copy of the Proposed Order only after emailing selfhelp@utcourts.gov requesting the documents filed by Respondent. Having received the Proposed Order—again, not through Respondent but by using the Self Help website (selfhelp@utcourts.gov)—and having read and contemplated the Proposed Order, Petitioner hereby disapproves Respondent’s Proposed Order as to form and substance. Petitioner adamantly and specifically **objects** to the form and substance of Respondent’s Proposed Order, as further detailed and expounded upon, and addressing each paragraph of Respondent’s Proposed Order, in Objection No. 3 hereinbelow.

OBJECTION NO. 2

2. Rule 7(j)(5)(A) of the Utah Rules of Civil Procedure states that “[t]he party preparing a proposed order must file it . . . *after* all other parties have approved the form on the order . . .” (emphasis added). However, Respondent never served the Proposed Order upon Petitioner for review and approval as to form before filing, but Respondent filed the Proposed Order regardless, in violation of the rules of civil procedure. Petitioner eventually obtained a copy of the Proposed Order by requesting it from the Self Help website (selfhelp@utcourts.gov); Petitioner never received the Proposed Order from Respondent. Having received the Proposed Order—again, not through Respondent but by using the Self Help website (selfhelp@utcourts.gov)—and having read and contemplated the Proposed Order, Petitioner hereby disapproves Respondent’s Proposed Order as to form and substance. Petitioner adamantly

and specifically **objects** to the form and substance of Respondent’s Proposed Order, as further detailed and expounded upon, and addressing each paragraph of Respondent’s Proposed Order, in Objection No. 3 hereinbelow.

OBJECTION NO. 3

3. Petitioner hereby **objects** to the form and substance of the following paragraphs of Respondent’s Proposed Order:

Note: For the sake of clarity and ease of reference, a table is provided below with two columns: on the left column is a *verbatim* (with mistakes and all) restatement of the individual paragraphs of Respondent’s Proposed Order—in Arial font, font size 11, and single-spaced—and on the right column are Petitioner’s responses and objections to the specific individual paragraphs of Respondent’s Proposed Order—in Times New Roman font, font size 12, and double-spaced.

Respondent’s Proposed Order	Petitioner’s Responses and Objections
<p>1. Good Client and Opposing Party are the legal parents of the following children. This court has jurisdiction to make orders about these children.</p> <p>a. J.I.S., Born 08/31/2005</p>	<p>1. No objection. The parties’ child is hereinafter referred to as J.I.S.</p>
<p>2. Good Client is awarded sole legal and sole physical custody of the children. Opposing Party will have parent-time at reasonable times and places.</p>	<p>2. Objection. Due to Respondent’s abuse of J.I.S., Respondent should have supervised visitations.</p>
<p>3. The parents will follow a custom parent-time schedule.</p> <p>The children will live with Good Client and will have parent-time with Opposing Party according to a custom parent-time schedule. Good Client will be the “custodial” parent:</p> <p>Parties have agreed that JIS will visit Opposing at Good’s expense for 14 days every year June 1-15, 2022, and June 1-15,</p>	<p>3. Objection. Due to Respondent’s abuse of J.I.S., Respondent should have supervised visitations with an approved supervisor, and the visitations should not exceed 48 hours at a time. It is simply too dangerous to J.I.S.’s</p>

Respondent's Proposed Order	Petitioner's Responses and Objections																												
2023	health to leave J.I.S. alone with Respondent.																												
<p>4. The parents will follow the schedule for special occasions below. If there is more than one child and the children's school schedules vary for purpose of a holiday, at the option of the parent exercising the holiday or the parent's half of the holiday, the children may remain together for the holiday period beginning the first evening that all children's schools are let out for the holiday and ending the evening before any child returns to school. (Utah Code 30-3-35, 35.1).</p>	<p>4. Objection. Due to Respondent's abuse of J.I.S., it is not safe for J.I.S. to spend more than two days with Respondent.</p>																												
<table border="1" data-bbox="191 802 792 1276"> <thead> <tr> <th data-bbox="198 810 490 865">Special Occasion</th> <th data-bbox="496 810 786 865">Parent-Time Schedule</th> </tr> </thead> <tbody> <tr> <td data-bbox="198 873 490 907">Labor Day Weekend</td> <td data-bbox="496 873 786 907">No parent time</td> </tr> <tr> <td data-bbox="198 915 490 970">Columbus Day Weekend</td> <td data-bbox="496 915 786 970">No parent time</td> </tr> <tr> <td data-bbox="198 978 490 1138">Fall School Break (If applicable, commonly known as U.E.A. weekend)</td> <td data-bbox="496 978 786 1138">No parent time</td> </tr> <tr> <td data-bbox="198 1146 490 1180">Halloween</td> <td data-bbox="496 1146 786 1180">No parent time</td> </tr> <tr> <td data-bbox="198 1188 490 1222">Veterans' Day</td> <td data-bbox="496 1188 786 1222">No parent time</td> </tr> <tr> <td data-bbox="198 1230 490 1264">Thanksgiving Break</td> <td data-bbox="496 1230 786 1264">Call of at least one hour</td> </tr> </tbody> </table> <p data-bbox="240 1276 539 1310">(table continued below)</p>	Special Occasion	Parent-Time Schedule	Labor Day Weekend	No parent time	Columbus Day Weekend	No parent time	Fall School Break (If applicable, commonly known as U.E.A. weekend)	No parent time	Halloween	No parent time	Veterans' Day	No parent time	Thanksgiving Break	Call of at least one hour	<p>In Respondent's table provided in this paragraph 4, under "Summer School Break / Vacation," Respondent states that she should have parent-time with J.I.S. for 14 days every year. However, due to Respondent's abuse of J.I.S., Petitioner adamantly and specifically objects to Respondent's desired parent-time of 14 days with J.I.S., because it is not safe for J.I.S. to spend more than two days with Respondent.</p>														
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Respondent's Proposed Order		Petitioner's Responses and Objections
Children's Birthdays	A call of at least one hour	
Good Client's Birthday	Good Client will have parent-time each year on Good Client's birthday from 3:00 p.m. until the following morning when Good Client delivers the child to school, or 8:00 a.m. if there is no school. Birthdays take precedence over holidays and extended parent-time, except Mother's Day and Father's Day. Birthdays do not take precedence over uninterrupted parent-time if the parent exercising uninterrupted time takes the child away from that parent's residence for the uninterrupted extended parent-time.	
Opposing Party's Birthday	call of at least one hour	
5. Pick-up and drop-off ("transfers") of the children for parent-time will be as described below: No arrangements can be made at this time for who will pick up, deliver and return the children for parent-time.		5. No objection.
6. The school the children will attend is based on Good Client's home residence. Good Client has authority to check the children out of school. Good Client has access to the children during school.		6. No objection.
7. Parents will communicate with each other by: By telephone: Good Client's phone: (801) 123-4567 Opposing Party's phone: (801) 123-4567 By letter By email: Good Client's email: goodclient@email.com Opposing Party's email: opposingparty@email.com Other method of communication: Good Client to limit his calls to matters that pertain to child.		7. Objection. Both parties should be mutually restrained to only discuss matters related to J.I.S.
8. The parents will: <ul style="list-style-type: none"> • provide age-appropriate help to the children to communicate with the other parent. • give the children privacy during their 		8. Objection. It is not safe for J.I.S. to have private communications with Respondent, because Respondent would abuse the privacy,

Respondent's Proposed Order	Petitioner's Responses and Objections
<p>communication with the other parent. The parents will not interfere with or monitor communication between the children and the other parent.</p> <p>Parents and children may communicate with each other whenever the children choose.</p>	<p>and would be emotionally and psychologically abusive to J.I.S. Respondent's abuse of J.I.S. caused J.I.S. to attempt suicide three times.</p> <p>Therefore, it is not safe for J.I.S. to have</p>
<p>private communications with Respondent, unless J.I.S. desires to have private communications with Respondent.</p>	
<p>9. Other terms regarding records and information sharing:</p> <p>Mr. Client will provide copy of grades within 48 hours of receiving them. Mr. Client will keep JIS at Primary Children's Hospital where specialist is for JIS bleeding disorder. Mrs. Opposing Party and Mr. Client must approve of the therapist the JIS will see a minimum of twice a month.</p>	<p>9. Objection. Respondent should have no say as to any doctors, medical providers, or treatments with regard to J.I.S. Respondent has used this power in the past to control and manipulate J.I.S. and the doctors. Respondent</p>
<p>has changed J.I.S.'s therapists over twelve times in four years because she did not like the therapists telling Respondent to make changes to help J.I.S. Respondent has a well-established history of not acting in the best interest of J.I.S.</p>	
<p>10. During their parent-time, the parent may consent for the children to travel with a sports team, religious group, school group, relatives, friends, by themselves, or with others.</p> <p>Other agreements about travel by the children: At Mr. Client's expense he will provide a roundtrip flight JIS out for a yearly visit on June 1-15, 2022 and June 1-15, 2023</p>	<p>10. Objection. Petitioner no longer agrees to a long, two-week yearly visit between J.I.S. and Respondent because it would be detrimental to J.I.S.'s mental health and general wellbeing. It is in the very best interest of J.I.S. to <i>not</i> see Respondent.</p>
<p>11. Other terms about relocating: Opposing Party lives 2,000 miles away.</p>	<p>11. No objection.</p>

Respondent's Proposed Order	Petitioner's Responses and Objections
<p>12. If either parent lives more than 149 miles away from the other or the parents live in separate countries, costs for the children's travel expenses for parent-time will be paid by Good Client.</p> <p>If a parent has been found in contempt for not being current on all support obligations, and they do not have primary physical care of the child, they will be responsible for the child's related travel expenses.</p> <p>Reimbursement for the child's travel expenses must be made within 30 days of receipt of documents detailing those expenses.</p>	<p>12. Objection. Respondent moved out of Utah without giving Petitioner notice, so, since Respondent is the one who moved out of Utah, Respondent should pay any travel expenses.</p>
<p>13. Good Client's gross monthly for child support purposes is \$100,000.00. His base child support amount using the sole custody calculation is \$5,908.00 per month. He receives the following gross monthly income:</p> <p>a. Good Client is employed at Self-employed . He earns \$100,000.00 gross (pre-tax) monthly income working a 40-hour a week job or less.</p>	<p>13. Objection. Petitioner's gross monthly income is \$5,000.00, most definitely <i>not</i> \$100,000.00. Petitioner is unsure as to how or where Respondent got the ridiculous figure of \$100,000.00 per month from.</p>
<p>14. Opposing Party's gross monthly income for child support purposes is \$0.00. Her base child support amount using the sole custody calculation is \$30.00 per month. She receives the following gross monthly income:</p> <p>a. Opposing Party does not have any countable income from any source.</p>	<p>14. No objection.</p>
<p>15. Opposing Party is ordered to pay child support to Good Client as follows:</p> <p>a. \$30.00 per month base support. This amount complies with the Utah Child Support Act. Unless the court orders otherwise, support for each child ends when:</p> <ul style="list-style-type: none"> • a child turns 18 or has graduated from high school during the child's normal and expected year of graduation, whichever occurs later, or • a child dies, marries, becomes a member of the United States armed forces, or is emancipated (Utah Code 78A-6-801). 	<p>15. No objection.</p>
<p>16. Once a child is no longer eligible to receive child support, the support amount for the eligible children will be recalculated using the child support worksheet (Utah Code 78B-12-202 et seq.). The parties may not divide the base child support award by the number of children and subtract that amount from the prior child support amount.</p>	<p>16. No objection.</p>

Respondent's Proposed Order	Petitioner's Responses and Objections
17. Child support will be paid as follows: Parties will decide on a date	17. No objection.
<p>18. The sole custody worksheet was used to calculate child support.</p> <ul style="list-style-type: none"> ● Good Client's base child support amount is \$5,908.00 per month. ● Opposing Party's base child support amount is \$30.00 per month. <p>If physical custody of a child changes from what the court orders:</p> <ul style="list-style-type: none"> ● The parent owing support must pay the support amount to whomever has physical custody of the child. ● The parent must pay the support amount without asking the court to modify the child support order. ● This does not apply to temporary parent-time changes. (Utah Code 78B-12-108). 	<p>18. Objection. Petitioner's gross monthly income is \$5,000.00, so it is impossible that his base child support amount be \$5,908.00. Respondent used the ridiculous figure of \$100,000.00 per month as Petitioner's gross monthly income, which is how Respondent arrived at the absurd figure of \$5,908.00 per month in base child support for Petitioner.</p>
<p>19. If a child lives with the non-custodial parent by court order or written agreement of the parties for:</p> <ul style="list-style-type: none"> ● 25 of any 30 consecutive days, base child support will be reduced by 50% for each child who lives with the non-custodial parent during that time. (Utah Code 78B-12-216(1)(a)). ● 12 of any 30 consecutive days, base child support will be reduced by 25% for each child who lives with the non-custodial parent during that time. (Utah Code 78B-12-216(1)(b)). <p>The custodial parent's normal parent-time and holiday parent-time do not count as an interruption of the consecutive day requirement.</p>	19. No objection.
20. If a child receives cash assistance through the T.A.N.F. or F.E.P. programs, any agreement by the parties to reduce child support during extended parent-time must be approved by the Office of Recovery Services.	20. No objection.
21. The person ordered to receive child support can request mandatory income withholding (Utah Code 62A-11 parts 4 and 5). If support is past due, the State of Utah may take federal or state tax refunds or rebates and apply the amounts to the child support owed. Withheld income will be sent to the Office of Recovery Services (ORS) until all past-due support is paid. Child support payments will be sent to:	21. No objection.

Respondent's Proposed Order	Petitioner's Responses and Objections
<p>Office of Recovery Services PO Box 45011 Salt Lake City, Utah 84145-0011</p> <p>unless ORS gives notice that payments must be sent elsewhere. If ORS begins mandatory income withholding, child support is due on the first day of each month and will be past due on the first day of the next month.</p>	
<p>22. Good Client and Opposing Party will each pay half of any ORS fee. If a fee is withheld from payments to Opposing Party, Good Client will reimburse Opposing Party for half the fee. If a fee is withheld from payments to Good Client, Opposing Party will reimburse Good Client for half the fee.</p>	<p>22. Objection. Since Respondent is to pay child support to Petitioner, Respondent should solely be the one to pay any ORS fees. The parties should not share any ORS fees.</p>
<p>23. The issue of past-due child support may be decided by future court or administrative action.</p>	<p>23. No objection.</p>
<p>24. The parties must notify each other of any change in their income as follows: It has been agreed that parties will work out child support matters on their own since Opposing is disabled and recovering from cancer</p>	<p>24. No objection.</p>
<p>25. The parties can ask to change this child support order by motion after three years from the date of its entry if:</p> <ul style="list-style-type: none"> ● there is a difference of 10% or more between the amount previously ordered and the new amount of child support under the Utah child support guidelines, ● the difference is not temporary, and ● the amount previously ordered was not a deviation from the child support guidelines. (Utah Code 78B-12- 210(8)). <p>If the children receive TANF funds at the time an adjustment is sought, ORS will review the order and ask the court to adjust the amount if appropriate. (Utah Code 62A-11-306.2).</p>	<p>25. No objection.</p>
<p>26. The parties can ask to change this child support order at any time by petition if there has been a substantial change in circumstances because of material changes in:</p> <ul style="list-style-type: none"> ● custody ● the relative wealth or assets of the parties ● income of a parent of 30% or more ● the employment potential and ability of a parent to earn ● the medical needs of the child or ● the legal responsibilities of either parent for the support of others. (Utah Code 78B-12- 	<p>26. No objection.</p>

Respondent's Proposed Order	Petitioner's Responses and Objections
<p>210(7) and (9)).</p> <p>The change must result in a difference of 15% or more between the amount previously ordered and the new amount of child support under the Utah child support guidelines. The difference may not be temporary.</p> <p>The court can consider natural or adoptive children born after the entry of the decree other than those in common to both parties as part of a request to modify an existing award subject to limitations in the law. (Utah Code 78B-12-210(7)).</p>	
<p>27. The parents may claim the parties' children as dependents/exemptions for tax purposes as follows: Good Client will solely claim JIS in exchange he will pay Opposing Party a one-time fee of \$3,500 made due upon the settling of case</p>	<p>27. Objection. Petitioner is not willing to pay \$3,500.00 to Respondent. Respondent has little to no financial responsibility over J.I.S.,</p>
<p>so Respondent should receive no tax benefit as it pertains to J.I.S. It would be neither fair nor equitable to have Petitioner pay Respondent any money for this matter; Respondent does not deserve it, and it is not warranted.</p>	
<p>28. Good Client must maintain medical, hospital, and dental care insurance for the dependent children if it is available at reasonable cost.</p>	<p>28. No objection.</p>
<p>a. If, at any time, a dependent child is covered by the medical, hospital, or dental insurance plans of both parents, the coverage will be as follows:</p> <ul style="list-style-type: none"> • Good Client's insurance will be primary coverage. • Opposing Party's insurance will be secondary coverage. <p>b. If a parent remarries and that parent's dependent child is not covered by that parent's health, hospital, or dental insurance plan but is covered by a stepparent's plan, the coverage will be as follows:</p> <ul style="list-style-type: none"> • Good Client spouse's insurance will be primary coverage. • Opposing Party spouse's insurance will be secondary coverage. <p>c. Both parties will equally share the out-of-pocket costs of the insurance premiums.</p> <p>d. Both parties will equally share all uninsured and unreimbursed medical and dental expenses that are reasonable and necessary. This includes deductibles, co-insurance, and co-payments paid by a party for the dependent children.</p> <p>e. The party who pays health care expenses must provide the other party written</p>	

Respondent's Proposed Order	Petitioner's Responses and Objections
<p>verification of the cost and payment within 30 days.</p> <p>f. If a party does not follow this order and provide written verification, they may not be able to receive credit for health care expenses or recover the other party's share of the expenses.</p> <p>g. On or before January 2 of each year, the party ordered to maintain coverage must provide verification of coverage to the other party, and ORS, if they are involved.</p> <p>h. If there is any change in coverage, within 30 days of the change the party ordered to maintain coverage must notify the other party and ORS, if they are involved.</p>	
<p>29. Neither party has received or is receiving public assistance from the State of Utah.</p>	<p>29. No objection.</p>
<p>30. The parties will sign all documents necessary to comply with the parentage decree within 60 days from entry of the decree. If a party fails to sign a document within 60 days, the other party may ask the court to appoint someone to sign the document. (Utah Rule of Civil Procedure 70)</p>	<p>30. No objection.</p>

OBJECTION NO. 4

4. Respondent should *absolutely not* be granted any parent-time or visitation rights over J.I.S., because Respondent is a significant danger to J.I.S.'s wellbeing, as evidenced by the following listed occurrences of abuse on the part of Respondent (and Respondent's wife) against J.I.S., as well as other important factors to consider listed below:

- a. J.I.S. has suffered severe mental, physical, emotional, and psychological abuse while under Respondent's care during the past seven years.
- b. There was an instance involving Respondent threatening physical harm against J.I.S. with a hammer.
- c. Respondent's wife has hit and harmed J.I.S. in the past.

- d. On or about July 9, 2021, J.I.S. attempted to commit suicide by swallowing all of her remaining Zoloft at once. This was J.I.S.'s third suicide attempt in the past twelve months while in the care of Respondent.
- e. J.I.S. spent nine days in a residential psychiatric facility following the above incident.
- f. After the J.I.S. was released from the residential psychiatric facility, Petitioner brought J.I.S. back to Utah to reside with Petitioner during the 2021 – 2022 school year.
- g. J.I.S.'s physical, mental, emotional, and psychological health, and overall constitution of her person and wellbeing in general, have dramatically improved since she began living with Petitioner. J.I.S. is no longer subjected to the cruel, unusual, and recurrent abuse of Respondent.
- h. J.I.S. refuses to go back to Respondent and be in Respondent's care on a permanent basis at the conclusion of the school year, or at any time in the future. J.I.S. does not wish to go back to live with Respondent ever, under any circumstances.
- i. It is Petitioner's belief that it is practically inexorable that J.I.S. may attempt any number of dangerous behaviors, including another suicide attempt, if forced to return to live with Respondent.
- j. J.I.S. has experienced, and continues to experience, panic attacks and severe anxiety at the very thought of returning to live with Respondent.
- k. Respondent regularly, four or more times per week, threatened to hit J.I.S.

- l. Respondent has inflicted severe psychological harm upon J.I.S., and has inflicted J.I.S. with cruel and unusual punishment, as illustrated by the following experience: One day, Respondent was punishing Child, who is a child who was put in Respondent's custody from March of 2020 until July of 2021, whom J.I.S. views as a sibling—although they are not related, nor is Child a child of Respondent, but instead Child's mother signed over the guardianship of Child to Respondent—who is *four* years old, who was punished by Respondent by having her squat for thirty or more minutes, and by spanking her. J.I.S. stepped in to protect Child, and told Respondent that the punishment she was inflicting upon Child was excessive and that she should stop. Respondent responded by telling Child that every time J.I.S. said anything, Child's punishment would be increased. These cruel games and manipulations on the part of Respondent have severely psychologically harmed J.I.S. and Child. Furthermore, J.I.S. and Child were punished by not being allowed to talk to each other, touch each other, or hug each other for up to *two weeks* at a time. These cruel and unusual psychological punishments on the part of Respondent strongly warrant that Petitioner be granted the *sole* physical custody and the *sole* legal custody over J.I.S., in order to protect J.I.S. from Respondent and to promote J.I.S.'s best interests.
- m. Preceding J.I.S.'s suicide attempt of July 8, Respondent took "blessed" oil into J.I.S.'s room and began "blessing" all of J.I.S.'s possessions in order to make Satan "leave this house." Furthermore, Respondent repeatedly told J.I.S.

that she would never be allowed to live with her father, Petitioner. These crazy, bizarre, incoherent, and unreasonable actions on the part of Respondent have psychologically harmed J.I.S.

- n. Respondent has subjected J.I.S. to years of cruel and consistent manipulation and psychological abuse. J.I.S. has made it very clear that she will not go back to Respondent's household. Again, Petitioner strongly fears that if J.I.S. is forced back into Respondent's custody, J.I.S. will make another suicide attempt.
- o. Upon the foregoing, it is absolutely and indisputably clear that it is in the best interest of J.I.S. to *not* award Respondent any visitation rights or parent-time with respect to J.I.S., except as specifically provided in the responses in Objection No. 3 hereinabove, so that J.I.S. can live free from Respondent's habitual abuse and maleficence against J.I.S.

OBJECTION NO. 5

5. Petitioner absolutely **objects** to the Court entering Respondent's Proposed Order, for all the foregoing reasons established herein. Respondent's Proposed Order should be **denied** and **stricken** from these proceedings, and the Court should require that a new proposed Parentage Decree and Judgment be drafted by Petitioner.

CONCLUSION

Considering the foregoing facts and arguments presented in this Objection, reason compels the strong and indubitable conclusion that it is in the best interest of J.I.S. that Respondent's Proposed Order be denied and stricken from these proceedings, because

Respondent's Proposed Order seeks orders that would severely harm J.I.S. and significantly undermine her general wellbeing. Indeed, J.I.S. lives in fear of the possibility of returning to live with Respondent. As covered above, Respondent should have absolutely no parent-time or visitation rights with respect to J.I.S., except as specifically provided in Petitioner's responses and objections in Objection No. 3 hereinabove, because awarding Respondent with parent-time or visitation rights over J.I.S. would subject J.I.S. to further abuse by Respondent.

Moreover, having strongly established that it is in J.I.S.'s best interest to avoid contact with Respondent, the Court should further deny Respondent's Proposed Order on the grounds that Respondent never served the Proposed Order upon Petitioner as required by Rule 7 of the Utah Rules of Civil Procedure, so the Proposed Order was never approved as to form before filing. Indeed, Respondent produced several documents, but none were served upon Petitioner. Respondent even certified in the Certificate of Service of her documents that she served Petitioner with said documents, but that is simply not true; therefore, Respondent committed clear perjury before the Court, and she should be sanctioned accordingly.

WHEREFORE, having objected to Respondent's Proposed Order for all the foregoing reasons, having shown good and appropriate causes to object, and having established a strong and compelling "best interest of the child" argument, Petitioner respectfully prays for judgment against Respondent as follows, as well as prays for the following relief:

- A. That Respondent's Proposed Order be denied and stricken from these proceedings by the Court;
- B. that the Court order Petitioner to produce a new proposed Parentage Decree and Judgment;

- C. that Respondent be sanctioned by the Court for committing clear perjury before the Court in her Certificate of Service, as Respondent certified that she served Petitioner with her Proposed Order, but she did not (Furthermore, Respondent committed perjury multiple times because she filed several documents, certified that she served them upon Petitioner, but none were served upon Petitioner); and
- D. that the Court award any such further relief to Petitioner that it deems fair, appropriate, and equitable under the circumstances.

DATED December 22, 2021

/s/ Good Client
Good Client,
Petitioner Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2021, I served, via email, a true and correct copy of the foregoing upon:

Opposing Party
opposingparty@email.com

/s/ Good Client