|  |  |  |
| --- | --- | --- |
|  |  |  |

**IN THE JUVENILE COURT OF \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ COUNTY, TENNESSEE**

**state of tennesse )**

**Department of children’s services, )**

 **Petitioner, )**

 **)**

**v. )**

 **)**

**Parent 1 and ) Case No. \_\_\_\_\_\_\_\_\_**

**Parent 2 ) Respondents, )**

 **)**

**in the Matter of: )**

**Child 1, dob: \_\_\_\_\_\_\_\_\_ )**

**Child 2, DOB: \_\_\_\_\_\_\_\_\_\_ )**

**Children under the age of 18 years )**

**Motion for contact**

 COMES now the Mother, by and through counsel, and hereby moves this Honorable Court to grant her contact with her children. In support of this Motion, the Petitioner would show the following:

1. Mother was incarcerated on \_\_\_\_\_\_\_\_\_\_, 20\_\_ and has had no contact with her children since that day. Prior to her incarceration, Mother was the children’s primary parent. The Father of the children did not have custody of the children prior to mother’s incarceration.
2. Pursuant to an Order filed with this court on \_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_, Mother has not been allowed to have any contact with her children.
3. Mother alleges that the children wish to continue contact with Mother.
4. Mother alleges that continued supervised telephone contact is in the best interest of the children so that the children can continue a relationship with their Mother.
5. The Department of Children Services has produced no evidence that telephone contact with Mother will be detrimental to the children. Mother alleges that the only reason contact is being denied is that the current guardians of the children are refusing to allow such contact.
6. This matter has not been adjudicated.

WHEREFORE, PREMISES CONSIDERED:

1. Petitioner requests that this motion come before this court for a hearing.
2. That upon a hearing on this matter that the court order the Mother be granted supervised telephone contact with the children.
3. For such other general relief for which movant may be entitled.

Respectfully submitted,

ATTORNEY NAME, BPR #\_\_\_\_\_\_\_\_\_\_\_\_\_\_

address

Phone Number

Attorney for Respondent

.

**NOTICE OF HEARING**

 **PLEASE TAKE NOTICE** that the Motion for Contact is scheduled to be heard on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_ at \_\_\_\_\_\_ a.m. in the County Juvenile Court. Be present if you wish to be heard.

**CERTIFICATE OF SERVICE**

 I hereby certify that as of this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, \_\_\_\_\_\_\_\_, I hand delivered, emailed, faxed and/or deposited in the United States Mail, with sufficient postage thereon, a copy of the foregoing Motion addressed to:

[*List the names and addresses of each attorney/person/party noticed*.]

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

 Attorney Name