

Motions Practice for RCW13 Guardians ad Litem

Morgan Chaput, Attorney at Law
Child Advocate Program of Pierce County
WACAP Fall Conference 2022

Today's Training

- General information about motions
- Preparing to file a motion
- Drafting a motion and its accompanying documents
- Motion responses and replies
- Presenting a motion in Court
- Other miscellaneous issues related to motions practice

Important Note

- **Become (at least marginally) familiar with your local rules.**
 - All counties have local civil rules that address the logistics of filing a motion in your county.
 - Issues like timing, page limits, and hearing dates are all dictated by local rules.
- Your program staff will be able to walk you through the applicable local rules to get your motion in front of the Court.
- Everything that I will show you today is how Pierce County does motions.
 - Please keep in mind that your county does things differently!
 - Your program staff are the best resource for learning the nuances of your county.

What is a Motion?

A motion is “a written or oral application requesting the court to make a specified ruling or order.”

Black’s Law Dictionary (11th ed. 2019), available at Westlaw.

Common Motions In Dependency Cases

- Motion to Amend Placement
- Motion to Amend Visitation
- Motion to Dismiss Dependency
- Motion to Appoint Youth Attorney
- Motion for GAL/Advocate Withdrawal
- Motion for Medical Treatment
- Motion to Continue

Uncommon Motions In Dependency Cases

- Motion for Travel
- Motion for Name Change
- Motion to Allow Unsupervised Contact with Relative
- Motion to Amend Permanent Plan
- Motion for Relative Genetic Testing
- Motion for Homeschooling
- Motion to Compel FCAP Assessment
- Motion for Haircut
- Motion to Required DCYF to Pay for New Glasses for Child
- Motion for Driver's Education
- Motion for Reconsideration
- Motion for Revision
- Motion for Clarification
- Motion to Substitute Out of County Court Appointed Advocate
- Motion to Compel ICPC
- Motion to Cease Adoption Recruitment
- Motion for Return of Child's Personal Items

Motion: Preparation

- Before doing anything else, talk to your program coordinator.
 - They have probably managed this issue before and can help guide your request.
 - They also know the local rules and the best way to get the issue before the Court.
- Before beginning to work on your request to the Court, have you asked the parties if they agree with what you are asking for?
 - Judicial economy: Court time is precious and should be treated as a last resort.
 - We can often get things resolved collaboratively, behind the scenes, before needing to bring an issue to Court.
 - If the request is something that the Court has to Order, agreement from all parties beforehand can also dictate whether the Court can sign an Order *ex parte* (without a hearing).

Motion: Preparation

- Motion Questionnaires

- Motion questionnaires can be helpful in guiding and organizing your thoughts as you put together your request

- Presentation materials includes the six questionnaires that we regularly use in our program:

- Amending Placement

- Amending Visitation

- Dismissing Dependency

- GAL/Advocate Withdrawal

- Medications and Medical Treatment

- Request for an Attorney

- Exhibits:

- Exhibits can be helpful to document facts identified in your materials

- Exhibits can also relay information from other professionals that support your motion

Motion: Preparation

- Timing of Hearing: Look at a Calendar!
 - When do you want the hearing to occur?
 - Is there a deadline involved? (i.e., the child needs to be out of their current placement by a set date).
 - Is there another hearing upcoming in the case? Could you set your motion to be heard at the same time as the other hearing?

Motion: Drafting Notice of Hearing

- Notice of Hearing (Notice of Issue)
- Timing
 - **Check your local rules!**
 - Rules will tell you how many days' notice you have to provide before a hearing is held.
- Notice
 - This document tells all of the parties to the case when and where the hearing will take place.

**IN THE SUPERIOR COURT JUVENILE DIVISION
PIERCE COUNTY, WASHINGTON
NOTICE OF HEARING**

IN RE THE WELFARE OF

DOB: [REDACTED] **CAUSE NO:** [REDACTED]

NAME: [REDACTED]	WSB#: [REDACTED]
ADDRESS: [REDACTED]	TELEPHONE#: [REDACTED]
CITY, STATE, ZIP: [REDACTED]	
EMAIL: [REDACTED]	Assistant Attorney General

Please take notice that an issue of law in this case will be heard on the date below and the clerk is directed to note this issue on the appropriate calendar.

NATURE OF HEARING: GUARDIAN AD LITEM'S MOTION TO AMEND PLACEMENT TO RELATIVE CARE

All motions shall be made in compliance with all applicable Court Rules and in writing, copies of the Motion, Notice of Hearing (date and time), together with all supporting documents including affidavits, declarations, and certified statements must be served on all parties at least seven (7) Court days before the hearing.

DATE AND TIME OF HEARING: {Yellow} Wednesday, September 7, 2022, 10:30 AM, JCD3, via Zoom <https://zoom.us/j/98153040940?pwd=cDVxT2FMeUU0alpndkExbkRyMWNkQT09>

<input type="checkbox"/> Red Docket (Tacoma West 11/34) (10:30 AM Monday JCD3)	<input type="checkbox"/> Contested Docket (Monday, Thursday JCD4, Wednesday JCD3)
<input type="checkbox"/> Orange Docket (Tacoma West 3/40) (3:00 PM Monday JCD3)	<input type="checkbox"/> Legally Free (9:00 AM 2 nd /4 th Friday, JCD4)
<input checked="" type="checkbox"/> Yellow Docket (Parkland 84/87) (10:30 AM Tuesday JCD3)	<input type="checkbox"/> Family Recovery Court (9:00 AM Friday, CCB)
<input type="checkbox"/> Green Docket (Parkland 68/81) (3:00 PM Wednesday JCD3)	<input type="checkbox"/> Best 4 Babies (3:00 PM 2 nd Friday, JCD3)
<input type="checkbox"/> Light Blue Docket (Lakewood South 9/13/26) (10:30 AM Thursday JCD2)	<input type="checkbox"/> Special Set
<input type="checkbox"/> Blue Docket (Puyallup East 24/35) (3:00 PM Thursday JCD2)	
<input type="checkbox"/> Lavender Docket (Puyallup East 32/45) (10:30 AM Thursday JCD3)	

Signed:	Dated: 8/24/2022
Name: Morgan Chaput	WSB#: 42869
ADDRESS: 5501 Sixth Avenue	TELEPHONE#: (253) 798-7338
CITY, STATE, ZIP: Tacoma, WA 98406	
EMAIL: morgan.chaput@piercecountywa.gov	Attorney for: Child Advocate Program of PC

THE ABOVE INFORMATION MUST BE COMPLETED AND SIGNED
The Commissioner's Courtrooms are located at Remann Hall 5501 6th Avenue, Tacoma, WA 98406-2696

ADDITIONAL PARTIES

NAME: [REDACTED]	WSB#: [REDACTED]
ADDRESS: [REDACTED]	TELEPHONE#: [REDACTED]
CITY, STATE, ZIP: [REDACTED]	[REDACTED]
E-MAIL: [REDACTED]	

NAME: [REDACTED]	WSB#: [REDACTED]
ADDRESS: [REDACTED]	TELEPHONE#: [REDACTED]
CITY, STATE, ZIP: [REDACTED]	Attorney for Mother
E-MAIL: [REDACTED]	

NAME: [REDACTED]	WSB#: [REDACTED]
ADDRESS: [REDACTED]	TELEPHONE#: [REDACTED]
CITY, STATE, ZIP: [REDACTED]	Attorney for Mother
E-MAIL: [REDACTED]	

NAME: [REDACTED]	WSB#: [REDACTED]
ADDRESS: [REDACTED]	TELEPHONE#: [REDACTED]
CITY, STATE, ZIP: [REDACTED]	Attorney for Father
E-MAIL: [REDACTED]	

Motion: Drafting Motion

- Motion
 - Generally, this document will be a concise statement of what you are asking the Court to do.
- Briefing
 - Depending on the issue and your Court, you may also submit briefing on an issue.
 - This is a more robust discussion of case law, statutes, rules, and your arguments.

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE
JUVENILE COURT

IN RE THE WELFARE OF:) CAUSE NO. [REDACTED]
[REDACTED],)
DOB: [REDACTED]) GUARDIAN AD LITEM'S MOTION TO
) AMEND PLACEMENT TO RELATIVE
) CARE
)

The Guardian ad Litem, [REDACTED], by and through her attorney, moves this court for an Order amending placement to relative care with, paternal Grandmother, [REDACTED]. This motion is based on the declaration of [REDACTED], as well as the court's files and the records therein.

DATED this 24th day of August, 2022.

Morgan Chaput, WSBA No. 42869
Attorney for Child Advocate Program of Pierce County

Certificate of Service

I hereby certify that I served a true and correct copy of this pleading by fax, email, e-service, or mail to all parties of record on the ____ day of ____ 2022.

_____ Name/Date

Motion: Drafting Declaration

- Declaration
 - Statement made under penalty of perjury that lists the facts and information that support your motion.
 - May identify some of the case history pertinent to your motion.
 - Must be signed by the Advocate or Guardian ad Litem who is making the declaration.
- Exhibits
 - Any documentary evidence of what you have attested to in your declaration may be helpful to support your argument and your motion.
 - Examples:
 - Medical Motion: Physician correspondence and medical records
 - Visitation Motion: Family Time reports
 - Placement Motion: Therapist correspondence and recommendations
 - Be mindful that some exhibits may need to be sealed and viewable only to the Court.

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE
JUVENILE COURT

IN RE THE WELFARE OF:) CAUSE NO. [REDACTED]
[REDACTED])
DOB: [REDACTED]) GUARDIAN AD LITEM'S
) DECLARATION IN SUPPORT OF
) GAL'S MOTION TO AMEND
) PLACEMENT TO RELATIVE CARE
)

I, [REDACTED], am the assigned Guardian ad Litem for the above-named child. I am over 18 years of age and competent to testify to the statements made herein. I hereby declare under penalty of perjury under the laws of the State of Washington that the following is true and correct:

1. This Guardian ad Litem is respectfully requesting that [REDACTED]'s placement be amended to paternal Grandmother, [REDACTED].
2. In making this request, the Guardian ad Litem has completed a walkthrough of the proposed placement's home and has been advised by DCYF of the results of Grandmother's homestudy. Grandmother's homestudy was approved for placement of [REDACTED] in August 2022.

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- a. This Guardian ad Litem has been unable to review the homestudy, despite requests from DCYF.
 - b. This GAL respectfully requests that DCYF file the homestudy for review by the Court as part of its response to this Motion to Amend Placement.
 3. [REDACTED] is currently in foster care. He has been in this home for approximately one year, the duration of his dependency, aside from a short receiving care placement at the very beginning of the case.
 4. [REDACTED] has a half-Brother, [REDACTED].
 - a. The children resided together briefly but had aggressive behaviors toward each other.
 - b. Even now, when the children visit, the visitation monitors have to physically separate the children to keep them from hurting each other.
 - c. Placement of the brothers together has been considered by this GAL but is not recommended at this time.
 - i. The children have different parentage and different permanency plans.
 5. This GAL understands that Washington State law requires preference for relative placement over foster care.
 6. Paternal Grandmother, [REDACTED], has come forward as a placement option for [REDACTED], as she had previously raised him.
 - a. Due to some allegations of physical discipline ([REDACTED] stated that "She hit me with a belt"), as well as concerns surrounding paternal Grandmother's

1 prior foster care license, a homestudy needed to be completed prior to the
2 placement being approved.

3 7. Paternal Grandmother was referred for a psychological evaluation with a
4 parenting component. DCYF's referral for this service stated as follows:

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

1 a. Social Worker [REDACTED] has indicated to this GAL that an
2 assessment was completed and provided to the homestudy writer
3 for [REDACTED].

4 b. This GAL has yet to receive a copy of that assessment from DCYF,
5 despite a request for the same.

6 8. Paternal Grandmother's homestudy was approved in August 2022 and paternal
7 Grandmother was approved for placement of [REDACTED].

8 9. This GAL visited paternal Grandmother's home on 8/24/2022 and observed it to
9 be safe and appropriate for him to stay. She had a room all set up for him and
10 is prepared for him to come and stay.

11 a. This Guardian ad Litem has met with paternal Grandmother, who shared
12 her strong attachment with [REDACTED] and her parenting strategies and
13 philosophies.

14 10. This GAL has met with [REDACTED] many times over the course of this dependency. He
15 has consistently reported to this GAL that his desired foal is to live with his
16 Grandmother and to be out of foster care.

17 a. In June 2022, [REDACTED] stated to this GAL that "Granny used to hit me, but she
18 doesn't do that anymore."

19 b. He has been having regular weekend visits with her for a few hours on
20 Sundays.

21 i. He states that he enjoys seeing her during these visits and that she
22 is very important to him.

23 11. [REDACTED] would like to change placements ahead of the new school year.
24
25

1 a. Even if this is not possible, paternal Grandmother has agreed to keep him
2 in his prior school for the supports and relationships that he has built
3 there.

4 12. An FTDM occurred on 8/16/2022. All parties were present and all parties were
5 in agreement to work toward a transition of [REDACTED] to his Grandmother's home.

6 13. This Guardian ad Litem's understanding is that Mother is opposed to this
7 placement.

8 a. This GAL last spoke with Mother on 4/18/2022 at a Permanency Planning
9 staffing.

10 b. At that time, Mother alleged that she had been sexually abused while in
11 paternal Grandmother's care. Mother reported that she had proof, but has
12 not yet provided that information to this GAL.

13 14. This Guardian ad Litem's understanding is that Father supports the placement
14 change.

15 15. This Guardian ad Litem recommends the following for [REDACTED]'s transition:

16 a. Continuation of the WISE team that has been working with [REDACTED] for almost
17 a year and is deeply invested in his wellbeing.

18 i. This team has already indicated a desire to be involved with the
19 transition, as well as support for paternal Grandmother in her care
20 of [REDACTED]

21 b. Continuation of his enrollment at his current school, [REDACTED]
22 [REDACTED].
23 [REDACTED].
24 [REDACTED].
25 [REDACTED].

1 i. This school has worked well with [REDACTED] to create a 504 plan that is
2 very constructive in partnership with his needs and there is a Right
3 at School program that is also familiar with [REDACTED].

4 c. These constants will help [REDACTED] feel confident and safe during his transition
5 to Grandmother.

6 d. These two transitional elements were both agreed upon by paternal
7 Grandmother during the FTDM.

8 16. This Guardian ad Litem believes it is in the best interest of a child to be placed
9 with appropriate relative caregivers, if possible.

10 17. [REDACTED] is a smart and aware young child who has continually desired to be with
11 family.

12 18. The proposed relative caregiver was his primary caregiver for several years of
13 his life and he desires to be back with her and clearly has an attachment to her.

14 19. The relative has overcome the barriers to placement and has worked toward
15 having him with her. It is appropriate for them to be reunited at this time.

16 20. This Guardian ad Litem believes that is in [REDACTED]'s best interest that his
17 placement be amended to relative care at this time.

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19
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21 _____, Guardian ad Litem
Pierce County Juvenile Court
22
23
24
25 _____, Tacoma, WA
Date/Place

Certificate of Service

I hereby certify that I served a true and correct copy of this pleading
by fax, email, e-service, or mail to all parties of record on the _____ day of _____, 2022.

Name/Date

Motion: Drafting Proposed Order

- Proposed Order
 - The moving party should draft a proposed Order, which reflects exactly what you want the Court to order.
 - Depending on the motion and your Court, you may also need to include findings of fact relevant to the issue.
 - This typically arises in highly contested motions with the potential for appeal.
 - Pierce County requires this for any Motion to Amend Placement.
 - The proposed Order should have a signature block for each of the parties or their attorneys to sign.
- Best Practice: Always leave some blank lines to add things that the Court may order during the hearing.
- Best Practice: Send your proposed Order to the other parties a day or two before the hearing, so they can see what Order you will be working off of as the Court makes its ruling.

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE
JUVENILE COURT

IN RE THE WELFARE OF:

██████████,
DOB: ██████████

) CAUSE NO. ██████████
)
) ORDER AND FINDINGS OF FACT
) ON GUARDIAN AD LITEM'S MOTION
) TO AMEND PLACEMENT TO
) RELATIVE CARE

THIS MATTER having come on this day before the Honorable Judge/Court Commissioner of the above-entitled Court, upon Motion of the Guardian ad Litem, by and through its counsel of record, Morgan O. Chaput; the Court having heard argument of counsel, having considered the declaration filed herein, and being fully advised in the premises, NOW, THEREFORE,

THE COURT FINDS that

- 1.1 The statute and caselaw are clear that preference must be given to placement in relative care for all children in the dependency system who are removed from the care of their parents.
- 1.2 The Court has the authority to oversee and decide placement decisions of children in dependency proceedings based upon the health, welfare, safety and best interest of the child. See RCW 13.34.060 (2); RCW 13.34.065(4); RCW 13.34.138. When determining placement of children, the overriding consideration is the best interest of the child. See *In re the Dependency of J.B.S.*, 123 Wn.2d 1, 863 P.2d 1344 (1993). A placement decision is a highly fact specific inquiry and cannot be reduced to a mathematical equation. *J.B.S.*, at 11.

- 1.3 Placement in relative care is preferred under RCW 13.34.130(6), "Placement of the child with a relative or other suitable person as described in subsection (1)(b) of this section shall be given preference by the court."
- 1.4 ██████████ is currently in foster care.
- 1.5 Paternal Grandmother, ██████████, has been identified as a placement resource for ██████████. Paternal Grandmother cared for ██████████ prior to this dependency.
- 1.6 Due to allegations of physical abuse and concerns regarding Grandmother's prior foster care license, DCYF requested Grandmother complete a homestudy prior to being considered for placement of ██████████.
- 1.7 Paternal Grandmother's DCY homestudy was approved in August 2022 for Grandmother to be placement for ██████████.
- 1.8 ██████████ has an existing bond with Grandmother and has requested to be placed in her home.
- 1.9 Mother has indicated that she was not in support of placement of ██████████ with paternal Grandmother, due to allegations of sexual abuse that occurred while in paternal Grandmother's care. There has not been any evidence produced to support those allegations.
- 1.10 Father is in support of placement with paternal Grandmother.
- 1.11 It is not in ██████████'s best interest to remain in foster care when there are viable relatives who are available for placement.
- 1.12 It is in ██████████'s best interest to be placed with paternal Grandmother, ██████████, at this time.

IT IS THEREFORE ORDERED:

- 2.1 The Guardian ad Litem's Motion to Amend Placement to Relative Care is GRANTED.
- 2.2 ██████████'s placement shall be amended to relative care with paternal Grandmother, ██████████.
- 2.3 To the extent possible, ██████████'s WISE team should continue to work with ██████████ as he transitions to his Grandmother's home.
- 2.4 To the extent possible, ██████████ should continue to attend his current school, ██████████.

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Done this 7th day of September 2022.

Judge/Court Commissioner

Presented by:

Morgan Chaput, WSBA No. 42869
Attorney for Child Advocate Program

Approved via Zoom 9/7/2022
_____, WSBA No. _____
Assistant Attorney General

Approved via Zoom 9/7/2022
_____, WSBA No. _____
_____, WSBA No. _____
Attorney for Mother

Approved via Zoom 9/7/2022
_____, WSBA No. _____
Attorney for Father

Motion: Filing and Serving

- Finalize all of the documents with your coordinator.
- They will work with your program to ensure that the documents are both:
 - Filed – Sent to the Court and made part of the official Court file; and
 - Served – Sent to the other parties

Motion: Responses

- Timing
 - **Check your local rules for timing!**
- Each party (DCYF, parent, child) can file and serve a *response* to your motion.
 - This response may be in support of your request.
 - This response may be opposed to your request.
- Make sure that you review any responses before you go to Court, so you can be prepared to address the other parties' arguments.

Motion: Reply

- Timing
 - **Check your local rules for timing!**
- As the moving party, you get the last filing before the hearing, which is called a *reply*.
 - This document is filed and served on all parties before the hearing and most likely addresses two things:
 - Any opposing arguments identified by another party; and
 - A reiteration of why the Court should granted your request.

Motion: Confirmation

- **Check your local rules!**
 - Some counties require you to confirm a motion hearing a set number of days before the hearing is set.
 - If you don't confirm the hearing, the Court administratively strikes your hearing.

Motion: Argument Preparation

- Review your motion, declaration (with exhibits), responses, replies, and proposed Order before the hearing.
- Assume that the Court has reviewed all of your filings and the filings from the other parties relevant to the issue.
- Prepare bullet points of your key arguments

Motion: Arguing

- Open the hearing by identifying yourself and your role and identifying exactly what you are asking the Court to do:
 - “Your Honor, we are requesting that Amanda’s placement be amended from foster care to relative care with paternal Grandmother, Barbara Miller.”
- Working from your bullet points, make a record of the important information that has informed your recommendation.
 - *Do not* read your declaration into the record. The Court has read it. The parties have read it. No one needs to hear it word for word again.
- Close this part of the hearing by reiterating your request and looping in best interests:
 - “Your Honor, we believe that this proposed change in placement to paternal Grandmother, Barbara Miller, is in Amanda’s best interest at this time. Thank you.”

Motion: Arguing

- Court will then ask to hear from the other parties: DCYF, Parents, Child.
- Court will then ask to hear from others present regarding the child:
 - Caregivers, relatives, therapists, visitation supervisors, etc.
- Listen to the other parties' arguments!
 - If they make arguments (for or against the motion) that you would like to address, make a note of it.
 - You do not need to address all of the arguments they make.
- Keep a neutral face and demeanor throughout the hearing, even if you disagree with the facts being presented or the arguments being made.
- Do not interrupt. The Court *should* offer an opportunity for you to speak again.

Motion: Arguing

- As the moving party, the Court should let you have the last argument, called a rebuttal.
- At this time, concisely address any of the arguments made by other parties.
- Close the hearing by again identifying what you are asking the Court to do:
 - “Your Honor, we respectfully request that this Court find that the proposed change in placement is in Amanda’s best interest and that this Court grant the Court Appointed Advocate’s Motion. Thank you.”

Motion: Arguing

- The Court will usually issue its ruling from the bench.
 - Occasionally, a Court will say that it needs to take more time to consider the pleadings and argument and will issue a written decision at a later date.
- The Court will generally give an explanation for why it is ruling the way it is and then will issue its decision.
- As the Court makes its ruling, take notes so that you can modify your proposed Order or add things that the Court has ordered.
- Do not interrupt the Court as it makes its ruling.
- When the Court has completed its ruling, you may ask for clarification on anything it ordered.
- Circulate your proposed Order to the other parties' attorneys for review and signature.

Miscellaneous: Shortened Time

- If you have an emergent issue that needs to be in front of a Court as soon as possible and can't wait for a regular hearing date, you may need to do the motion on shortened time.
- **Check your local rules!**
 - Most counties have specific guidance around the procedures for shortening time
- Typically, this will require filing a Motion to Shorten Time, which identifies why the hearing can't wait.
- The Court will either *grant* or *deny* the Motion to Shorten Time
 - If the Court *grants* the Motion to Shorten Time, the Court will then hear the underlying motion.
 - If the Court *denies* the Motion to Shorten Time, the motion will have to be set on regular time, with appropriate notice to the parties

Miscellaneous: Ex Parte

- Ex parte means “on or from one party only, usually without notice to or argument from the adverse party.” *Black’s Law Dictionary* (11th ed. 2019), *available at* Westlaw.
 - In practice, this generally just means “without a hearing.”
- If all parties are in agreement with a motion, the Court may be willing to enter an Order “ex parte”.
- In working with your coordinator, you may reach out to the other parties *before* filing your materials to determine if everyone is in agreement.
 - If yes, your coordinator may be able to facilitate ex parte entry of an Order
- Common ex parte motions:
 - Appointment of an Attorney
 - Guardian ad Litem/Advocate Withdrawal

Questions?

Morgan Chaput, Attorney at Law
Child Advocate Program of Pierce County
253.370.4891
morgan.chaput@piercecountywa.gov