

**NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA**

**CAUSE NO. 123456-78**

<b>IN THE INTEREST OF</b>	§	<b>IN THE DISTRICT COURT OF</b>
	§	
<b>JANE SMITH</b>	§	<b>TRAVIS COUNTY, TEXAS</b>
<b>AND</b>	§	
<b>JANE SMITH</b>	§	<b>324<sup>ND</sup> JUDICIAL DISTRICT</b>
	§	
<b>AND CHILDREN</b>	§	
<b>BOBBY SMITH</b>	§	
<b>JESSICA SMITH</b>	§	

**JOHN SMITH'S MOTION**  
**FOR PARENTAL ALIENATION ASSESSMENT**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW JOHN SMITH, Petitioner in the above styled and numbered cause, and files this, his *Motion for Parental Alienation Assessment* and shows in support:

On or about January 14<sup>th</sup>, 2016 the parties entered into an *Agreed Order in Suit To Modify Parent Child Relationship and Appointing Parenting Facilitator*.

There are two children the subject of this matter, BOBBY SMITH age 17 and JESSICA SMITH at 14.

In the Agreed Order, the parents agreed to alternating weekly possession for which JOHN SMITH has been exercising with both of his Children since.

However, recently the JESSICA SMITH expressed a desire to no longer exercise not only alternating weekly possession but no possession with her father, JOHN SMITH, for which JOHN SMITH believes is without significant justification.

At the time of the filing of this motion, BOBBY SMITH continues with alternating weekly possession with his father, JOHN SMITH.

Approximately 8 weeks prior, JOHN SMITH and his daughter, JESSICA SMITH, with the consent of her mother JANE SMITH began participating in family counseling with THERAPIST.

JESSICA SMITH (the "Child") met with THERAPIST and JOHN SMITH and THERAPIST participated in five (5) joint sessions together until the last week of February it is believed recommended a suspension of further family counseling and recommended the Child to

individual counseling.

Based upon the interactions during these joint sessions, there is a clear concern of Parental Alienation on the part of JANE SMITH against the Child's father, JOHN SMITH.

At this juncture, JOHN SMITH believes there is cause to justify a request for the court to Order the following:

- (1) An assessment for the existence of parental alienation, when factoring the best interests of the Child and the relationship with her father JOHN SMITH;
- (2) Individual counseling for the Child;
- (3) Order that THERAPIST continue to be appointed as the family counselor and Order that family counseling continue between JOHN SMITH and JANE SMITH and/or the Child(ren) of this suit as recommended by THERAPIST;
- (4) Order that JOHN SMITH and JANE SMITH be ordered to participate in family counseling as recommended and follow the recommendations of THERAPIST including a referral, if any, to (a) individual counseling, (b) mental health examination, or other recommendation related to same for JOHN SMITH, JANE SMITH and/or a Child the subject of this suit;

By way of example, JOHN SMITH would show that JANE SMITH and the Child, exhibit attributes identified as characteristics of a parent engaging in parental alienation such as the following:

- (1) Lacks appropriate boundaries with the Child(ren), in particular the Child, when discussing legal issues and her father JOHN SMITH;
- (2) The Child and JANE SMITH model the same language and purported concerns of JOHN SMITH, even using the same words to articulate such concerns;
- (3) JANE SMITH encourages the Child to not have a relationship with her father and to believe/feel/express there is no need for a relationship with JOHN SMITH.

JOHN SMITH requests the Court to order the appointment of a qualified professional to be ordered to, as applicable, contact requisite professionals, parties, and the minor children and report to the Court the presence of alienation, if any, as the basis of the facts presented in this cause.

Further, JOHN SMITH requests the Court to order all parties to permit and sign all necessary releases to effectively complete said psychological investigation.

JOHN SMITH requests the Court to order JOHN SMITH and JANE SMITH to each

pay half of any and all related expenses to the requested psychological investigation.

*Prayer*

Movant prays the Court order the appointment of a qualified professional to conduct an alienation assessment as requested herein and that the parties and children be required to following the recommendations as a result of same coming from such assessment.

Movant prays that the Court grant the requested relief contained herein.

Movant prays for general relief.

Respectfully submitted,

**ATTORNEY**

By: \_\_\_\_\_  
ATTORNEY

**CERTIFICATE OF SERVICE**

This is to certify that on February \_\_\_\_, 2017 a true and correct copy of the above and foregoing document was served on the following:

**Via Facsimile: (512) XXXXXXXX**

**And E-Service**

Attorney

Austin, Texas

By: \_\_\_\_\_  
attorney