**PET**

JUDICIAL DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

In the Matter of the Parental Rights as to: ) CASE NO:

 ) DEPT. NO:

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,** )

DOB: )

AGE: \_\_YEARS OLD )

 )

 A Minor. )

 )

**PETITION FOR RESTORATION OF PARENTAL RIGHTS**

 COMES NOW, Petitioner, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, by and through her attorney of record, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, Esq. of FIRM, and hereby petitions this Court for the restoration of the parental rights of her natural mother \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

This Petition is based upon the following Memorandum of Points and Authorities, the papers and pleadings on file herein, the exhibits attached hereto, and such other documentary

and oral evidence as may be presented at the hearing on this motion.

DATED this \_\_\_\_\_\_\_ day of May, 2011.

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

**NOTICE OF HEARING ON PETITION FOR**

**RESTORATION OF PARENTAL RIGHTS**

TO: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, ESQ, Deputy District Attorney, Juvenile;

TO: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, Department of Family Services’ Caseworker;

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will bring the foregoing PETITION FOR RESTORATION OF PARENTAL RIGHTS on for hearing before the above-entitled Court on the \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_, 2011 at \_\_\_\_\_\_ am/pm.

DATED this \_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_, 2011.

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

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. BACKGROUND STATEMENT**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (“\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_”) was born in Chicago, Illinois, on November 21, 1996, and she is currently fourteen years old. Her birth certificate, issued by the state of Illinois, lists \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ as the mother and no father’s name is listed. It has been established that \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, now known as \_\_\_\_\_\_\_\_\_\_\_ (“\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_”), is the natural mother of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. The whereabouts of the natural father, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, are unknown and his parental rights have been terminated.[[1]](#footnote-1) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ petitions to restore her natural mother’s parental rights, and she wishes to return to the care, custody, and control of her natural mother in Illinois.

On December 21, 2006, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, along with her two younger brothers, \_\_\_\_\_\_\_\_\_ and \_\_\_\_\_\_\_\_\_\_\_\_\_, were removed from the care and custody of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ by the Department of Family Services (“DFS”) because \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ drug addiction prevented her from providing proper support and care for her minor children. [[2]](#footnote-2) They became Wards of the Court on February 14, 2007.[[3]](#footnote-3) As a result, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ was allowed to continue to live in the home of her maternal grandmother, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (“\_\_\_\_\_\_\_\_”). \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has been residing at Southern Peaks Regional Treatment Center in Canon City, Colorado since July 13, 2010.[[4]](#footnote-4) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has maintained telephonic contact with her natural mother while at Southern Peaks since December, 2010. Though adoption by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ was originally considered, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has communicated to her DFS caseworker and attorney that she no longer wishes to be adopted.

On September 8, 2009, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ parental rights were terminated by default when she did not appear for the termination of parental rights hearing.[[5]](#footnote-5) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ termination of parental rights case was never adjudicated on its merits, and the court never heard evidence or testimony in defense of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ retaining her parental rights. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ departed Las Vegas, Nevada on August 27, 2008 and was already residing in Chicago, Illinois at the time of the hearing.[[6]](#footnote-6)

At the time of the termination, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ was attending the Preparatory Institute, School for Academic Excellence at Charles I. West Hall.[[7]](#footnote-7) Her grades were above average, and the caseworker noted that she excelled academically. Following the termination, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s behaviors declined in foster care, and she was ultimately placed in a residential treatment facility by DFS. At the residential treatment facility, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has been receiving intensive therapy for nearly one year.

Prior to the termination, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ made significant progress in her case plan in order to reunify with her minor children. Additionally, since moving to Chicago, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has been gainfully employed with the Department of Rehabilitation.[[8]](#footnote-8) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has maintained a stable residence and continued to stay in contact with DFS.[[9]](#footnote-9) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ completed a two-hour assessment for substance abuse with Catholic Charities of the Archdiocese of Chicago on August 5, 2009.[[10]](#footnote-10) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ consistently attends Narcotics Anonymous, Cocaine Anonymous, and Alcoholics Anonymous meetings. She has a support system in place with her local church. On October 10, 2009, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ completed a parenting education course with Sinai Parenting Institute in Chicago.

The DFS Caseworker noted in the November 10, 2009, Report for Permanency and Placement Review that “[t]he natural mother successfully completed classes such as parenting styles, stress management, child abuse, child neglect, adolescent development and effective communication. According to the natural mother’s counselors, she was very active in the class and participated with a great attitude.”[[11]](#footnote-11)

**II. LEGAL ARGUMENT**

**A. Pursuant To NRS 128.170, The Parental Rights Of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s Natural Mother Should Be Restored.**

NRS 128.170 states that a child who has not been adopted, and whose natural parents have had their rights terminated, may petition the court for the restoration of the parental rights so long as the natural parent, for whom the restoration is sought, consents in writing. Additionally, NRS 128.190 provides as follows:

1. If a valid petition is filed pursuant to 128.170, the Court shall hold a hearing to determine whether to restore the parental rights of the natural parent or parents.
2. Before granting a petition for the restoration of parental rights , the Court must find that:
3. If any child who is the subject of the petition is 14 years of age or older, the child consents to the restoration of parental rights.
4. The natural parent or parents for whom restoration of parental rights is sought have been informed of the legal obligations, rights and consequences of the restoration and are willing and able to accept such obligations, rights and consequences.

In the instant case, NRS 128.170, 128.190(1) and 128.190(2) are satisfied because (1) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ petitions this Court to restore her natural mother’s parental rights; and (2) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has been informed of the legal obligations, rights, and the consequences of her restoration and she accepts those obligations, rights and consequences.[[12]](#footnote-12)

As NRS 128.170, 128.190(1) and 128.190(2) are satisfied; the only remaining issue is NRS 128.190(3), which states:

1. If the Court finds the necessary facts pursuant to subsection 2, the court shall order the restoration of parental rights if the court further finds by preponderance of the evidence that
	1. The child is not likely to be adopted; and
	2. Restoration of parental rights of the natural parent or parents is in the best interests of the child

**B. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Is Unlikely To Be Adopted**

NRS 127.020 states, in pertinent part, that the consent of a minor child “over the age of 14 years, is necessary to [her] adoption.” Here, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ is fourteen years old and has expressed an intention to refuse adoption. Additionally, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has been eligible for adoption since September 9, 2009. No adoption has occurred since that time and adoption is unlikely even if \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ should consent. Furthermore, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has resided in the locked residential treatment facility for over 9 months and prior to that three foster placements failed because of her mental health issues. Accordingly, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ is unlikely to be adopted.

**C. Restoration Of Parental Rights Is In \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s Best Interest.**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ was not an exemplary parent in the past because of her former drug addiction. The Court found \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ to be an unsuitable parent based upon abandonment and failure of parental adjustment because \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ failed to appear either personally or through an attorney to provide contravening evidence or testimony at the TPR trial.[[13]](#footnote-13) However, prior to the TPR, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ did not demonstrate conduct evincing a settled purpose “to forego all parental custody and relinquish all claims” to \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ or her other children.[[14]](#footnote-14) Her rights were not terminated as to her oldest son \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Moreover, in the months preceding the TPR, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ made extraordinary efforts to reform her condition and prepare a safe, stable, and loving home for all of her children.

After \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ children were removed from her custody, DFS outlined specific safety and risk factors \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ needed to address. DFS indicated that \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ needed to address issues including substance abuse, mental health, and lack of resources. In \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ case plan, DFS determined measurements of success directly related to the identified deficiencies in her ability to parent her children.[[15]](#footnote-15) The case plan indicated that the natural mother should maintain a substance free lifestyle indicated in part by negative drug tests. The case plan also indicated that the natural mother should fully comply with recommendations of treatment services. Furthermore, the case plan required the natural mother to provide verification of stable housing and income sufficient to meet the needs of her children. Since the termination of parental rights, all of the aforementioned case plan requirements have been satisfied by the natural mother.

Throughout the past three years since \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ left the State of Nevada, she has made the necessary adjustments in her life to successfully recover from her addiction and become a proper parent. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has been afraid to return to Las Vegas and admitted this to the Caseworker, believing her return could trigger behaviors contrary to her recovery.[[16]](#footnote-16) The reforms in \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ life which occurred after the move to Illinois have evidenced \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ good judgment and decision-making.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has maintained a drug and alcohol-free lifestyle for over three years.[[17]](#footnote-17) Her recent tests have all been negative.[[18]](#footnote-18) She has maintained gainful employment with the State of Illinois, Department of Rehabilitation Services since the beginning of 2009. She has also maintained stable housing for over two years.[[19]](#footnote-19) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ started taking parenting classes in July 2009 and completed the intensive parenting program at the Sinai Parenting Institute in Chicago on October 10, 2009.[[20]](#footnote-20) According to the program assistant, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ participated actively in those classes.[[21]](#footnote-21) She can now demonstrate appropriately, and on an ongoing basis, the parenting skills she learned, if given the opportunity.

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ keeps a support system in place and fully complies with the recommendations she receives from her service providers.[[22]](#footnote-22) She has not exhibited any mental health issues that would impair her ability to properly interact, care or provide for her children.[[23]](#footnote-23) Additionally, even though the move made physical contact with her children nearly impossible, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ maintained telephonic contact with her minor children to the full extent permitted by DFS. [[24]](#footnote-24)

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ married \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ on October 24, 2009. They currently live in a one bedroom apartment at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. They are able and prepared to move into a larger apartment to comfortably house \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ with short notice. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and her husband have sufficient income and resources to provide for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s physical, mental and emotional needs.

Furthermore, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ wants to be reunited with her mother. This is \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s best hope for sustained mental and emotional health. It is clear that \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s mental and emotional health and stability rapidly deteriorated after \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ was removed from her life permanently. Even the case manager and therapist at Southern Peaks Regional Treatment Center permitted \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ to communicate with her mother since December, 2010.

**III. CONCLUSION**

At the time of termination, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ was already living in Chicago and making significant changes to her lifestyle. She is eager to fulfill her role as a mother. On the other hand, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s quality of life has tragically diminished after \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ permanent removal from her life. Refusing to restore \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ parental rights would, in effect, punish \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ inability to travel to Nevada for the TPR hearing. Furthermore, denying this petition would abandon \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ to the mercy of the foster care system. Such a ruling would be contrary to \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s best interest because it denies \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (1) a stable home; and (2) the opportunity to reunify with her now capable and fit mother.

Accordingly, it would be appropriate and in \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’s best interest for this Court to set aside the previous order to terminate \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_’ parental rights. By granting this Petition to Restore Parental Rights, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ could finally have the opportunity to live with her new and improved mother and experience a sense of family, safety and permanency that she so rightfully deserves and has been deprived of for so long.

Respectfully submitted this \_\_\_\_ day of April, 2011.

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

***CERTIFICATE OF SERVICE***

 I HEREBY CERTIFY that on the \_\_\_\_\_\_\_ day of April, 2011, I placed a true and correct copy of the foregoing ***PETITION FOR RESTORATION OF PARENTAL RIGHTS***, First-Class postage prepaid, in the United States Postal Service at Las Vegas, Nevada, and addressed as follows:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, ESQ.

 District Attorney Juvenile

Family Court

601 N. Pecos Road, Room 470

Las Vegas, Nevada 89101

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, Case Manager

Department of Family Services

701 N. Pecos Road, Bldg. K

Las Vegas, Nevada 89101

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

 An employee of the

 FIRM

**AFFIDAVIT OF \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

STATE OF ILLINOIS )

 )

COUNTY OF COOK )

 I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, do hereby swear and affirm that I consent to have the Order terminating my parental rights for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ set aside by the Nevada Court. I have also been informed of the legal obligations, rights, and consequences of restoring my parental rights for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, as required under Nevada Revised Statutes (NRS) 128.190(2)(b), and I accept the obligations, rights, and consequences. I declare under penalties of perjury under the laws of the State of Illinois that the foregoing is true and correct.

 **DATED** this \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_, 2011.

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

SIGNED and SWORN to before me

this \_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_, 2011.

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

NOTARY PUBLIC in and for

Said County and State

1. Termination of Parental Rights Order, September 9, 2009 [↑](#footnote-ref-1)
2. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, May 12, 2009 [↑](#footnote-ref-2)
3. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 09, 2010 [↑](#footnote-ref-3)
4. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 09, 2010 [↑](#footnote-ref-4)
5. Findings of Fact, Conclusions of Law and Order Terminating Parental Rights, September 8, 2009, filed October 2, 2009 [↑](#footnote-ref-5)
6. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 12, 2008; DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, May 12, 2009 [↑](#footnote-ref-6)
7. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 10, 2009 [↑](#footnote-ref-7)
8. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 10, 2009 and November 09, 2010 [↑](#footnote-ref-8)
9. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 10, 2009 and November 09, 2010 [↑](#footnote-ref-9)
10. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 10, 2009 and November 09, 2010 [↑](#footnote-ref-10)
11. *Id.*  [↑](#footnote-ref-11)
12. See attached, Affidavit of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. [↑](#footnote-ref-12)
13. Findings of Fact, Conclusions of Law and Order Terminating Parental Rights, September 8, 2009, filed October 2, 2009 [↑](#footnote-ref-13)
14. *NRS 128.012.* [↑](#footnote-ref-14)
15. DFS – Case Plan Document, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ S, February 14, 2007 [↑](#footnote-ref-15)
16. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, May 12, 2009 [↑](#footnote-ref-16)
17. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ s’ Petition for Order Restoring the Parental Rights of the Natural Mother filed March 2, 2011 [↑](#footnote-ref-17)
18. *See* Drug Tests, attached as Exhibit \_\_\_\_\_. [↑](#footnote-ref-18)
19. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 10, 2009 [↑](#footnote-ref-19)
20. Sinai Community Institute – Parenting Program, Attendance Report, October 9, 2010 [↑](#footnote-ref-20)
21. from \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, Program Assistant at Sinai Parenting Institute, Chicago, Illinois, October 10, 2009; DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 10, 2009 [↑](#footnote-ref-21)
22. Letter from \_\_\_\_\_\_\_\_\_\_\_, MHS, MAC, LCPC, CSADC, Department Director of The Catholic Charities of the Archdiocese of Chicago, August 6, 2009 [↑](#footnote-ref-22)
23. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 10, 2009 [↑](#footnote-ref-23)
24. DFS Caseworker \_\_\_\_\_\_\_\_’s Report for Permanency and Placement Review, November 10, 2009 [↑](#footnote-ref-24)