

DISTRICT COURT, EL PASO COUNTY, COLORADO Court Address: 20 E. Vermijo Ave. Colorado Springs, Colorado 80903	
In Re the Marriage of: Petitioner: HARMON LYNN WILFRED and Respondent: DEARNA GARCIA WILFRED	COURT USE ONLY ▲
Attorney: INMAN FLYNN & BIESTERFELD, P.C. By: Jeffrey N. Herren Attorney for Respondent Address: 1660 Lincoln Street, Suite 1700 Denver, CO 80264 Phone Number: (303) 861-5300 Fax Number: (303) 861-2746 Atty. Reg.#: 11374	Case Number: 97 DR 3393 Div/Ctrm: 2
MOTION TO APPOINTMENT OF SPECIAL ADVOCATE	

COMES NOW Respondent, by and through her attorney of record Inman Flynn & Biesterfeld, P.C. through Jeffrey N. Herren and respectfully requests the Court Appoint a Special Advocate as follows:

1. This Court Ordered a Special Advocate appointed for the minor children on December 10, 1999.
2. On March 20, 2000 the undersigned counsel entered his appearance in the case.
3. In an Order dated March 22, 2000 the Court Ordered the counsel for the Petitioner to send the names of three Special Advocates to the Respondent to effectuate the Court's prior Order concerning contact with the children in the Respondent's area of residence. In addition, the Court reaffirmed the December 10, 1999 ruling of the District by Judge Hall for telephone contact to be reestablished to the Special Advocate.
4. Counsel for the Petitioner did forward the name of three Special Advocates to the Respondent's counsel. Petitioner's counsel has since withdrawn but Petitioner and Respondent have both agreed to the appointment of Dr. Ira Gorman as a Special Advocate. Dr. Gorman's address is not listed below due to the confidentiality requirements of this case.
5. The parties respectfully requests that the Court appoint Dr. Ira Gorman, Ph.D. as a Special Advocate in this action. The parties further request that Dr. Gorman be ordered to visit with the

children and do an assessment of their mental condition. Dr. Gorman is also to assess the children's willingness or reluctance to see their father. Finally, as previously ordered, Dr. Gorman is to provide an opinion in the form of a written document to the Court and both parties as to whether the children are in need of ongoing therapy and/or if a therapeutic visitation session with Father would be helpful or necessary in order to have in person contact with the Father.

6. Furthermore, the Court approves the requests of the Petitioner that the telephone contact between the Petitioner and the children as previously Ordered by this Court be reestablished under the direction and control of the Special Advocate. The initial telephone conversations with the children and the Petitioner shall be supervised by the Special Advocate.

7. The parties further request that any correspondence or contact initiated by the Petitioner with Dr. Gorman be routed through the Respondent's counsel's office of Inman Flynn & Biesterfeld, P.C., c/o Jeffrey N. Herren, 1660 Lincoln Street, Suite 1700, Denver, CO 80264. When Petitioner hires Colorado counsel, any communication with Dr. Gorman can be through Petitioner's counsel.

8. The Court reaffirms all of its previous findings of fact and conclusions of law concerning this case and specifically reaffirms the request for the Respondent's need to not disclose her or the children's whereabouts to the Petitioner.

WHEREFORE the parties respectfully request the Court Order that Dr. Ira Gorman, Ph.D. be appointed as Special Advocate in this case and proceed immediately with the fulfilling the Court's Orders.

Respectfully submitted this 19th day of January, 2001.

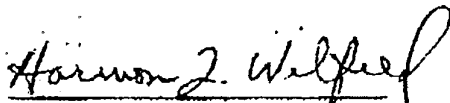
INMAN FLYNN & BIESTERFELD, P.C.

By: 

Jeffrey N. Herren

Attorney for Respondent

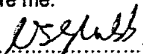
APPROVED AS TO FORM AND CONTENT:



Harmon Lynn Wilfred, pro se
Petitioner

EXHIBIT NOTE

This is the annexure marked "X" referred to in the within affidavit of HARMON LYNN WILFRED and sworn at Christchurch this 24th day of February 2006 before me:


A Solicitor of the High Court of New Zealand
(Solicitor to sign in part on Exhibit)

Christina Jane Glubb
Solicitor
Christchurch