

# Motion Practice

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Parent Defender



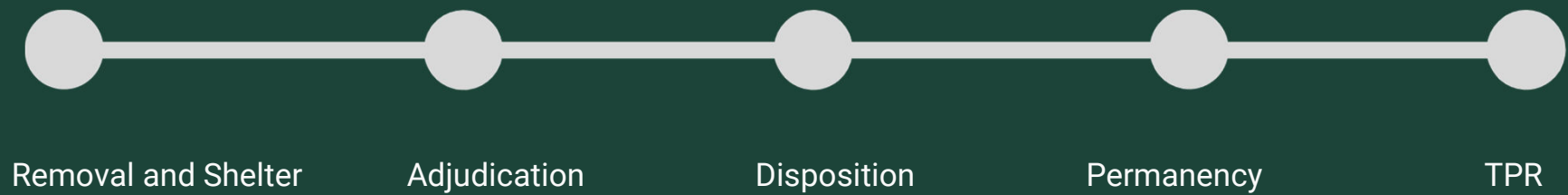
# Sample Motions

[https://drive.google.com/drive/folders/17hcv27QhSYsN6uA09p4h89\\_XCpLvtDYM?usp=drive\\_link](https://drive.google.com/drive/folders/17hcv27QhSYsN6uA09p4h89_XCpLvtDYM?usp=drive_link)

Forms Library  
Sample  
Pleadings



# Case Stages



## **Removal & Shelter**

Miss. Code Ann. § 43-21-303 -  
Taking into custody without custody order

Miss. Code Ann. § 43-21-307 -  
Authorizing temporary custody

Miss. Code Ann. § 43-21-309 -  
Shelter hearings

URYCP 16 - Shelter Hearings

# Shelter Hearing = Probable Cause Hearing

Jurisdiction

Custody Necessary

Continuation of residing in home contrary to welfare

Reasonable efforts to maintain child in home

OR

Emergency nature and no reasonable efforts

# Removal & Shelter

What information do  
you need immediately?

**Affidavit of Financial Eligibility**

**Motion for Parent Attorney**

Motion to Continue Shelter Hearing  
or Waiver of Shelter Hearing

**Motion for Disclosure**

IN THE YOUTH COURT OF JACKSON COUNTY, MISSISSIPPI  
STATEMENT OF INCOME

STATE OF MISSISSIPPI  
COUNTY OF JACKSON

Child's Name: \_\_\_\_\_ Cause No.: \_\_\_\_\_

Parent/Legal Guardian: \_\_\_\_\_

Address: \_\_\_\_\_

|                   | <u>FATHER</u> | <u>MOTHER</u> | <u>YOUTH</u> |
|-------------------|---------------|---------------|--------------|
| Salary (GROSS)    | _____         | _____         | _____        |
| Food Stamps       | _____         | _____         | _____        |
| A.D.C.            | _____         | _____         | _____        |
| Social Security   | _____         | _____         | _____        |
| S.S.I.            | _____         | _____         | _____        |
| Unemployment      | _____         | _____         | _____        |
| V.A. Benefits     | _____         | _____         | _____        |
| Retierment Income | _____         | _____         | _____        |
| Child Support     | _____         | _____         | _____        |
| Other Income      | _____         | _____         | _____        |
| <b>TOTALS</b>     | _____         | _____         | _____        |

Total Income and Benefits Monthly \_\_\_\_\_  
Total Income and Benefits Annually \_\_\_\_\_  
Number of Individuals living in the home for whom you are responsible \_\_\_\_\_  
Federal Register - Legal Services Income Guidelines for household \_\_\_\_\_

**ELIGIBLE:** \_\_\_\_ Yes \_\_\_\_ No

\_\_\_\_\_  
Signature of person completing form Date

PERSONALLY APPEARED before me the undersigned authority in and for the jurisdiction aforesaid, the within named \_\_\_\_\_, who stated to me under oath that the information herein is a true and accurate statement of my **GROSS** monthly income and benefits to the best of my knowledge, information, and belief.

\_\_\_\_\_  
Parent/Legal Guardian Signature Date

SWORN TO AND SUBSCRIBED before me this the \_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_.

\_\_\_\_\_  
Notary Public/Court Clerk

FINANCIAL DISCLOSURE

PARENT'S NAME \_\_\_\_\_  
 CHILDREN'S NAME \_\_\_\_\_  
 ADDRESS \_\_\_\_\_  
 PHONE \_\_\_\_\_  
 EMAIL \_\_\_\_\_

|                    |
|--------------------|
| ARE YOU :          |
| _____ Employed     |
| _____ Unemployed   |
| _____ Disabled     |
| _____ Retired      |
| _____ Incarcerated |

What is your current income from all sources each month (wages, bonuses, overtime, unemployment, disability, workman's compensation, alimony, child support, life insurance benefits, inheritances, trusts, union payments, retirement, pensions, spouse's monthly income, and contributions from other people to your household or veteran's benefits)?

How much do you currently pay in taxes and other mandatory deductions each month?

How much do you pay in rent/mortgage each month? Who lives in the home with you?

|   |       |                          |
|---|-------|--------------------------|
| How much do you pay for each month for: | _____ | Water/Sewage/Garbage     |
| _____ Electricity/Gas                   | _____ | Internet/Cable/Satellite |
| _____ Telephone/Cell phone              | _____ | Medical/Dental/Vision    |
| _____ Food/Household Supplies           | _____ | Credit Card Payments     |
| _____ Car Payment/Gas/Insurance         | _____ |                          |

Do you smoke? \_\_\_\_\_ If yes, how often: \_\_\_\_\_  
 Do you drink? \_\_\_\_\_ If yes, how often: \_\_\_\_\_  
 Do you take medication? \_\_\_\_\_ If yes, please list the medication, how often you take it and how much it costs per month \_\_\_\_\_

How many minor children do you have? \_\_\_\_\_ How many biological children live with you? \_\_\_\_\_  
 How much are you paying in child support pursuant to court order? \_\_\_\_\_  
 How much are you receiving in economic assistance? (SNAP, TANF, CHIPS, Social Security) \_\_\_\_\_

Have you ever qualified for free legal assistance? \_\_\_\_\_

Please list any property you own. Include vehicles, real estate, mobile homes, bank accounts, cash on hand, retirement accounts, stocks/bonds, etc.  
 \_\_\_\_\_  
 \_\_\_\_\_

Please list your prior employment, the dates you were employed, and your salary for the last year:  
 \_\_\_\_\_  
 \_\_\_\_\_

ACKNOWLEDGEMENT OF TRUTHFULNESS

I declare to the Court that the foregoing Questionnaire, including any attachments, is true and correct and that this Questionnaire was executed on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
 Parent/Guardian

IN THE YOUTH COURT OF \_\_\_\_\_ COUNTY, MISSISSIPPI

IN THE INTEREST OF: \_\_\_\_\_, A MINOR

**AFFIDAVIT OF FINANCIAL ELIGIBILITY**

I, \_\_\_\_\_, the parent of the above mentioned child, swear and affirm that:

- \_\_\_\_\_ I am financially unable to hire an attorney for this Youth Court Matter.
- \_\_\_\_\_ I am currently incarcerated.
- \_\_\_\_\_ I do not have a job.
- \_\_\_\_\_ I do not own any property that I could sell to obtain money to hire a private attorney.
- \_\_\_\_\_ I do not have cash or savings which would allow me to hire an attorney.
- \_\_\_\_\_ I have not disposed of any property for the purpose of taking advantage of this affidavit.
- \_\_\_\_\_ I do wish to have an attorney appointed to me to aid me in the above Youth Court Matter.



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IN THE YOUTH COURT OF DESOTO COUNTY, MISSISSIPPI

IN THE INTEREST OF:



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MOTION FOR RECORDS PURSUANT TO §43-21-261(3) and  
DISCOVERY PURSUANT TO U.R.Y.C.P. RULE 15(a)

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COMES NOW, \_\_\_\_\_, attorney for the parent or guardian of the minor child listed above, files this, their Motion of Records Pursuant to Miss. Code Ann. §43-21-261(3) and Discovery Pursuant to U.R.Y.C.P. Rule 15(a) in the above styled and numbered matter, and would show:

1. Miss. Code Ann. §43-21-261(3) states in part that “The attorney for the parent, guardian or custodian of the child, upon request, shall be provided a copy of any record, report or investigation relevant to a matter to be heard by a youth court...”
2. The Uniform Rules of Youth Court Practice Rule 15(a)(1) provides that “the child or other party to an adjudicatory hearing, or any proceeding thereafter, may make a written request for discovery to any other party...”

Therefore, the undersigned attorney for the parent or guardian hereby requests a copy of any record, report or investigation relevant to this matter, with the identity of the reporter redacted and the name of any other person if the disclosure of the information would be likely to endanger

43-21-261(3) – Disclosure of Records

U.R.Y.C.P. Rule 15 – Prehearing Procedures

Timing for filing discovery  
Reciprocal discovery

Petition shall be filed five days from the date of the shelter hearing

Petition Must Contain:

- Identification of the child – full name, birth date, age, sex and residence
- Identification of the parent/guardian/custodian including the name and residence
- Statement of the facts, including the facts which bring the child within the jurisdiction of the youth court and show the child is a neglected child or an abused child
- Type of adjudicatory relief sought

E.K. v. Mississippi Department of Child Protection Services, 249 So. 3d 377 (Miss. 2018)

# Adjudication

- Acknowledgement of No Contest
- Request for Subpoenas
- Motion to Dismiss
  - Untimely or Insufficient Petition (Miss. Code 43-21-251)
  - Untimely Adjudicatory Hearing ( Miss. Code Ann. 43-21-551) - 90 days
- Motion to Restore Custody or Immediate Reunification
- Motion for No Reasonable Efforts Finding
- Motion to Continue
- Motion for Prehearing Conference
- Motion for Findings of Fact and Conclusions of Law ( §43-21-561(4))

# Adjudication

Miss. Code Ann. § 43-21-551 -  
Time of Hearing

Miss. Code Ann. § 43-21-553 -  
Acceptance of Admissions

Miss. Code Ann. § 43-21-557 -  
Conduct of Hearing

Miss. Code Ann. § 43-21-559 -  
Evidence; admissions

Miss. Code Ann. § 43-21-561 -  
Standard of proof; order; confidentiality

URYCP 24 & 25 - Adjudication Hearings and Order

IN THE COUNTY COURT OF DESOTO COUNTY, MISSISSIPPI  
YOUTH COURT DIVISION

**IN THE INTEREST OF:**

\_\_\_\_\_

**CAUSE NO.**

\_\_\_\_\_

**REQUEST FOR SUBPOENA(S)**

\_\_\_\_\_

**PLEASE ISSUE SUBPOENAS** for the below listed witnesses to appear in Youth Court

at \_\_\_\_\_ o'clock A.M./P.M. on \_\_\_\_\_, the \_\_\_\_\_ day of \_\_\_\_\_,

20\_\_\_\_ to testify on behalf of the parent.

**NAME**

**ADDRESS**

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\_\_\_\_\_

IN THE YOUTH COURT OF DESOTO COUNTY, MISSISSIPPI

IN THE INTEREST OF:

**CHILD'S NAME**, A MINOR

24-YC-2015-P-###

**ACKNOWLEDGMENT OF NO CONTEST PURSUANT TO RULE 24(b)(2)**

- 1) My name is **PARENT'S NAME** and I am the parent/guardian of the child named above, who is alleged to have been abused and/or neglected.
- 2) I have authorized Attorney \_\_\_\_\_ to give me advice in this matter. I understand that I have requested an attorney to be appointed to represent me and **he/she** has been appointed. I understand that I have a right to hire private counsel, if I so desire, at my own expense.
- 3) I understand that I have the right to have the State of Mississippi prove the allegation(s) at a trial before Judge \_\_\_\_\_ without a jury, or, if necessary, before another judge if Judge \_\_\_\_\_ is unable to hear the case. I understand that I have the right to have the court issue subpoenas to compel persons to come to court and testify; the right to cross-examine witnesses; and the right to appeal an adverse ruling by the Youth Court to the Mississippi Supreme Court.
- 4) I understand that by entering a plea of no contest that I give up those rights, except the right to counsel. I understand there will be no trial and the Judge will adjudicate the child to be abused and/or neglected.
- 5) I plead no contest, do not wish to take issue with the allegation(s), and allow the Judge to believe the allegation(s) as stated in the Petition without any further proof by the State.
- 6) I understand that there will be a Disposition Hearing at which time the Court shall consider the child's physical and mental conditions; the child's need for assistance; the manner in which the parent/guardian participated in, tolerated, or condoned the abuse, neglect or abandonment of the child; and the ability of the child's parent/guardian to provide the proper supervision, protection, and care for the child.
- 7) I understand that in order for the child to be either maintained in my home or returned to my home, I will need to follow the orders of the Court and, if necessary, enter into a Service Agreement with the Mississippi Department of Child Protection Services.

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**MOTION TO DISMISS AND FOR IMMEDIATE REUNIFICATION**

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COMES NOW, \_\_\_\_, maternal grandmother and legal guardian of the minor child herein, and files this her *Motion to Dismiss and for Immediate Reunification* and would show unto the Court the following:

1. On August 30, 2018, a Shelter Hearing was held in this cause for the minor child, \_\_\_\_\_. The allegation is that the minor child is an abused child pursuant to Miss. Code Ann. §43-21-105(m). The exact allegation is as follows:

**“The agency received a report stating that \_\_\_\_\_ was beaten with an extension cord.”**

2. The youth court removed custody from \_\_\_\_\_ and awarded custody of the minor child to the Mississippi Department of Child Protection Services who placed the minor child in a licensed foster home. The youth court also placed a no contact order on \_\_\_\_\_ that the biological mother of the minor child.

3. On September 25, 2018, the Court purportedly entered an Order Continuing Adjudication Hearing, because of lack of service in this matter continuing the matter to April 2, 2019. On April 9, 2019, the Court entered another Order Continuing Adjudication Hearing continuing the matter to May 29, 2019.

4. Despite being served with a Summons, the Petitioner has not received a filed

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**MOTION TO DISMISS**

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COME NOW, \_\_\_\_\_, biological mother of the minor child herein, and files this her Motion to Dismiss and would show unto the Court the following:

1. On July 11, 2018, a Shelter Hearing was held in this cause for the minor child, \_\_\_\_\_. A shelter hearing was also held for the mother’s other biological children, \_\_\_\_\_, but all allegations of neglect against these minor children were dismissed.

2. On February 4, 2019, the biological mother and the undersigned counsel learned that an adjudication hearing was set in this matter for February 5, 2019. Further, upon information and belief, a Petition has never been filed regarding the minor child.

**NOTICE**

3. Mississippi Code Ann. §43-21-501 provides:

- (1) When a petition has been filed and the date of hearing has been set by the youth court, the judge or his designee shall order the clerk of the youth court to issue a summons to the following to appear personally at such hearing:
- (a) the child named in the petition;
  - (b) the person or persons who have custody or control of the child;
  - (c) the parent or guardian of the child if such parent or guardian does not have custody of the child; and
  - (d) any other person whom the court deems necessary.

4. The Supreme Court has held “The youth court is without jurisdiction unless the parents or guardian if available, be summoned as required by statute.” *Monk v. State*, 116 So.24

## **Disposition**

Service Plan  
or  
Bypass of Reasonable Efforts

Miss. Code Ann. § 43-21-601 -  
Time of hearing

Miss. Code Ann. § 43-21-603 -  
Conduct of hearing; disposition order

Miss. Code Ann. § 43-21-609 -  
Authorized dispositions for neglect or abuse

URYCP – 26, 27, & 28 – Disposition Hearings, Disposition Orders,  
Modification of Disposition Orders/Annual Reviews



# Permanency

Miss. Code Ann. § 43-15-12

URYCP 29

**Court determines whether the child should be:**

- (i) returned to the parent(s),
- (ii) placed with suitable relatives,
- (iii) referred for termination of parental rights and placed for adoption,
- (iv) placed for the purpose of establishing durable legal custody, or
- (v) continued in foster care on a permanent or long-term basis because of the child's special needs or circumstances.

# Disposition & Permanency

Motion for Services

Motion for Visitation/Unsupervised Visits

Motion for Trial Home Placement  
Motion for Direct Custody Order

Motion to Remove Caseworker or CASA

Motion to Override MDCPS Foster  
Placement Disqualification

Motion for Findings of Fact and  
Conclusions of Law (§ 43-21-603(8))

IN THE YOUTH COURT DIVISION OF DESOTO COUNTY, MISSISSIPPI

IN THE INTEREST OF:

\_\_\_\_\_, A  
MINOR

CAUSE NO.: \_\_\_\_\_

\_\_\_\_\_, AND

PETITIONERS

PETITION TO RESTORE CUSTODY TO PARENTS OF  
MINOR CHILD OR ALTERNATIVELY TO  
\_\_\_\_\_, FATHER OF PETITIONER OR \_\_\_\_\_, PATERNAL  
GRANDPARENTS OF PETITIONER \_\_\_\_\_

COME NOW, \_\_\_\_\_ and \_\_\_\_\_, husband  
and wife, and the natural parents of \_\_\_\_\_, a minor female child, who  
through their undersigned attorney and file this Petition seeking that custody of said minor  
child be restored to the natural parents or alternatively be temporarily placed with  
\_\_\_\_\_, natural father of Petitioner \_\_\_\_\_, or \_\_\_\_\_ and  
\_\_\_\_\_, the paternal grandparents of Petitioner, \_\_\_\_\_.

In support of said petition, your petitioners would show as follows:

1.

Your petitioners herein are husband and wife and are the natural parents of  
\_\_\_\_\_, a minor female child born on May 14, 2015, who is presently two (2)  
years of age.

2.

That on or about November 13, 2017, the prosecuting attorney for this Court filed a

IN THE CHANCERY COURT OF  
TISHOMINGO COUNTY, MISSISSIPPI  
YOUTH COURT DIVISION

IN THE INTEREST OF:

\_\_\_\_\_, A MINOR

MOTION FOR IMMEDIATE REUNIFICATION

COMES NOW, \_\_\_\_\_, natural parent of \_\_\_\_\_, the above  
referenced minor child, by and through the undersigned attorney, and files this her Motion for  
Immediate Reunification in the above styled and numbered matter and in support, would show  
unto the Court the following:

1. On or about May 14, 2023, CPS received a report regarding \_\_\_\_\_,  
specifically that "The mother tested positive for Buprenorphine. She has been exhibiting strange  
behaviors. She has three children in CPS custody. Two are twins and one other. When asked  
about support systems she stated, "her mother was cut up into pieces, all of her family got killed,  
and she has no one. She stated, "she is going to kill her ex (of the baby's fathers). She spoke  
about how she was a victim of abuse and got beat with a gun. Dr. \_\_\_\_\_ in Tupelo, MS is the  
doctor who prescribed her Subutex. She stated she is not allowed to see her other two children,  
because she was beaten by her husband and there was a bomb in her truck (what she told nursing  
staff). She has a history of drug use (marijuana and cocaine) and a psych abuse history. Want to  
speak with CPS before discharge. The mother was asking the nurse how to feed a baby. She

# Termination of Parental Rights

Miss. Code Ann. § 93-15-101 et seq.

Voluntary Termination  
&  
Involuntary Termination

# Guardian Ad Litem

43-21-201(1)(c): Child alleged to be abused/neglected shall be appointed an attorney. GAL may serve a dual role as long as no conflict of interest is present.

If conflict arises, GAL shall inform the Youth Court and the youth court shall retain the guardian ad litem to represent the best interest of the child and appoint an attorney to represent the child's preferences.

# Pro Se Forms

**Motion for Parent Attorney**

**Notice of Appeal**

**Designation of Record**

**Motion to Appeal in Forma Paupris**

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IN THE CHANCERY COURT OF  
\_\_\_\_\_ COUNTY, MISSISSIPPI  
YOUTH COURT DIVISION

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IN THE INTEREST OF:  
\_\_\_\_\_, A MINOR \_\_\_\_\_

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REQUEST FOR PARENT ATTORNEY

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COMES NOW, \_\_\_\_\_, natural parent of the minor children,  
\_\_\_\_\_, files this, her Motion For Parent Attorney in the above styled and  
numbered matter, and further respectfully requests that the \_\_\_\_\_ Chancery Court appoint  
a Parent Attorney in these case to represent the parent's stated interests.

WHEREFORE, PREMISES CONSIDERED, \_\_\_\_\_, respectfully prays that the  
above requested relief be granted and that appointed attorney be granted access to all information  
relevant to the above listed cases.

Respectfully submitted,

BY: \_\_\_\_\_

IN THE COUNTY COURT OF JONES COUNTY, MISSISSIPPI  
YOUTH COURT DIVISION

\_\_\_\_\_ COUNTY DEPARTMENT OF  
CHILD PROTECTION SERVICES,  
BY MARCUS D. DAVENPORT, AND

\_\_\_\_\_, \_\_\_\_\_,  
\_\_\_\_\_, A MINORS, BY AND  
THROUGH THEIR NEXT FRIEND,  
MARCUS D. DAVENPORT

PETITIONERS

VS CIVIL ACTION, FILE NO. \_\_\_\_\_

\_\_\_\_\_ AND  
\_\_\_\_\_

RESPONDENTS

NOTICE OF APPEAL

TO: Jones County Circuit Clerk  
Jones County, Mississippi  
101 Court St. Suite B  
Ellisville, MS 39437

You are hereby notified that the parents,  
\_\_\_\_\_, appeal to the Supreme Court of Mississippi  
the Permanency Order regarding the hearing held on \_\_\_\_\_, 2024,  
filed and docketed by the Jones County Circuit Clerk.

This the \_\_\_\_ day of \_\_\_\_\_, 2024.

Respectfully Submitted,



IN THE COUNTY COURT OF \_\_\_\_\_ COUNTY, MISSISSIPPI  
YOUTH COURT DIVISION

\_\_\_\_\_ COUNTY  
DEPARTMENT OF CHILD PROTECTION SERVICES  
BY MARCUS D. DAVENPORT, AND  
\_\_\_\_\_, A MINOR,  
BY AND THROUGH THEIR NEXT FRIEND,  
MARCUS D. DAVENPORT

PETITIONERS

VS. \_\_\_\_\_ CIVIL ACTION NO. \_\_\_\_\_

AND \_\_\_\_\_  
\_\_\_\_\_ RESPONDENTS

**DESIGNATION OF THE RECORD**

COMES NOW \_\_\_\_\_, Appellants, pursuant to  
Miss. Sup. Ct. R. 10(b)(1), designates the following parts of the record as being  
necessary to be included on appeal:

1. All clerk's papers, pleadings, trial transcripts, opinions, judgments and  
exhibits filed, taken or offered contained in the Court file, Cause No. \_\_\_\_\_

IN THE COUNTY COURT OF \_\_\_\_\_ COUNTY, MISSISSIPPI  
YOUTH COURT DIVISION

\_\_\_\_\_ COUNTY DEPARTMENT OF  
CHILD PROTECTION SERVICES,  
BY MARCUS D. DAVENPORT, AND  
\_\_\_\_\_, A MINOR, BY AND  
THROUGH HER NEXT FRIEND,  
MARCUS D. DAVENPORT

PETITIONERS

VS. \_\_\_\_\_ CIVIL ACTION, FILE NO. \_\_\_\_\_

\_\_\_\_\_ AND \_\_\_\_\_  
RESPONDENTS

**MOTION TO APPEAL IN FORMA PAUPERIS**

Comes NOW, \_\_\_\_\_, Respondent, and files this their  
Motion to Appeal *In Forma Pauperis*, and in support thereof,  
\_\_\_\_\_ would should the following to-wit:

1. That I am indigent and that because of my poverty, I are unable to pay the  
fees and costs of this proceeding and that I believe I am entitled to proceed without  
paying the fees or costs.
2. That I am currently unemployed or receive \$\_\_\_\_\_ per month in  
income.
3. That I have no savings or assets that could be used to retain an attorney.
4. That pursuant to Section 43-21-651, they are entitled to an appeal without  
prepayment of court costs and filing fee.

WHEREFORE, PREMISES CONSIDERED, Respondent prays that this  
court rule that their appeal shall be had without cost, and then same paid by  
\_\_\_\_\_ County.

This the \_\_\_\_ day of \_\_\_\_\_, 2024.

# Other Best Practices

- Engagement Letter or Contract
- Entry of Appearance or Order Appointing Family Attorney and Authorizing Disclosure
- ADA Notifications
- Parent Court Report
- Logs and Handbooks
- Motion to Withdraw

Office of Parent Representation  
DeSoto County, Mississippi

311 W. South Street, Suite B, Hernando, MS 38632  
TEL: (662) 469-8698 • FAX: (662) 469-8711

Jennifer L. Morgan, Esq.  
jmorgan@desotocountymississippi.gov

Licensed in MS & TN

## ENGAGEMENT LETTER

Date: \_\_\_\_\_

**Client Name:** \_\_\_\_\_  
**Address:** \_\_\_\_\_  
**Phone Number:** \_\_\_\_\_  
**Case Information:** \_\_\_\_\_

I, \_\_\_\_\_, the undersigned, hereinafter Client, understand that the DeSoto County Office of Parent Representation and/or Jennifer L. Morgan is an appointed public defender that provides free legal representation to parents involved in child welfare cases in the DeSoto County Youth Court. This Office can only aid you with your case in DeSoto County Youth Court and not in other courts and representation is limited to only the Youth Court matter(s) unless authorized by the DeSoto County Youth Court.

Date

### VIA EMAIL:

Harrison County Department of Human Services  
Division of Family and Children's Services  
caseworker  
Address

My Client/Child: Parent Name/Child Name  
Cause No.: 24-YC-2015-P-####

Dear Caseworker,

I have been appointed by Judge \_\_\_\_\_ to represent Parent Name, the biological mother/father of Child Name in the above-referenced Youth Court matter. Accordingly, I would like to confirm that:

1. My contact information will be noted in all relevant MDCPS records.
2. My client and I will be informed each time a new social worker is assigned.
3. My client and I will be notified of all Family Team Meetings, Placement Disruption Meetings, and Foster Care Reviews/County Conferences. (MDCPS Policy §§ D(VII)(B)(4)(b), D(VII)(B), D(VII)(D)(3))<sup>1</sup>; and
4. My client will be notified regarding any recommended psychotropic medication prior to administration. (MDCPS Policy § D(VII)(A)(3)).

Please consider this an ongoing request for any and all documents to which my client is entitled. Such documents include, but are not limited to, medical, mental health, education, and law enforcement records, drug tests, and other documents which form the basis of MDCPS investigative and/or hearing reports. Additionally, my client and I are entitled to access to MDCPS hearing reports prior to court hearings. (MDCPS Policy § A(XIX)(D)) and Miss. Code Ann. § 43-21-261(3). I

IN THE YOUTH COURT OF \_\_\_\_\_ COUNTY, MISSISSIPPI

IN THE INTEREST OF:

**CHILD NAME**, A MINOR

**24-YC-2015-P-####**

RESPONDENT-??? COURT REPORT

**I. IDENTIFYING INFORMATION**

|                  |  |  |
|------------------|--|--|
| Child's Name:    |  |  |
| Date of Birth:   |  |  |
| Date of Custody: |  |  |
| Father:          |  |  |
| Mother:          |  |  |

**II. ALLEGATIONS**

Summary of allegations from MDCPS.

**III. PETITION**

Language from petition.

**IV. SHELTER HEARING – date**

**Attendees:**

**Placement:**

**Ordered:**

**V. PLEA/ADJUDICATION HEARING – date**

Navigating the Youth Court Legal System



**A Parent's Handbook**

A guide provided you by  
Mississippi Programs of HOPE

# MISSISSIPPI PARENT HANDBOOK

**A GUIDE TO YOUTH COURT FOR  
ABUSE AND NEGLECT CASES**

A COLLABORATIVE EFFORT OF

**MISSISSIPPI PROGRAMS OF HOPE**

OF HOPE RISING MISSISSIPPI



Case Plan Log

Name \_\_\_\_\_

Period \_\_\_/\_\_\_/\_\_\_ to \_\_\_/\_\_\_/\_\_\_

| My appointment is with | Date | Time | Reason for Meeting | What was discussed | Notes |
|------------------------|------|------|--------------------|--------------------|-------|
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IN THE COUNTY COURT OF  
DESOTO COUNTY, MISSISSIPPI  
YOUTH COURT DIVISION

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IN THE INTEREST OF:  
\_\_\_\_\_, A MINOR \_\_\_\_\_

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MOTION TO WITHDRAW

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COMES NOW, the attorney of record for the Mother, \_\_\_\_\_, who respectfully requests this Court to allow Jennifer L. Morgan to withdraw as counsel for the Mother, \_\_\_\_\_, and in support thereof would show that Jennifer L. Morgan is no longer able to represent the Mother, \_\_\_\_\_, in this proceeding and that a change in counsel at this point will not prejudice any party nor unduly delay the proceedings.

FURTHER, the movant prays that the Court allow the Mother, \_\_\_\_\_, thirty (30) days to retain new counsel in this cause.

SO MOVED, this the 12<sup>th</sup> day of October, 2020.

Respectfully submitted:

By: \_\_\_\_\_  
Jennifer L. Morgan (MSB 101964)  
311 W. South St. Suite B



# Discussion

# Townhall Meetings

April 5, 2024

Noon!!



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