

STATE OF INDIANA)
)SS:
COUNTY OF [REDACTED])

IN THE [REDACTED]
CAUSE NO.: [REDACTED]

[REDACTED])
)
[REDACTED])
)

[REDACTED]

VERIFIED MOTION TO CONTEST ADOPTION PURSUANT TO I.C. § 31-19-10-1

Comes now [REDACTED] (herein, "Father" or "[REDACTED]"), in person and by Counsel, Jessica K. Keyes, and files this Verified Motion to Contest Adoption Pursuant to I.C. § 31-19-10-1, and in support thereof, shows this Court, as follows:

1. That I am the biological father of [REDACTED], born [REDACTED].
2. That I received notice of a Petition for Adoption and a copy of a Petition for Adoption at a hearing in [REDACTED] on [REDACTED], which was file stamped on [REDACTED].
3. **That I strenuously object and contest the Adoption Petition filed in this cause.**
4. That the Appearance of Attorneys for Petitioner, [REDACTED] notes that there are no currently pending or related matters. This is material omission, as [REDACTED] is represented in the Adoption matter by the same counsel that represents [REDACTED] in the pending post-decree parenting matter of the same Children, under cause number [REDACTED].
5. That in fact, myself (the biological Father) and [REDACTED], the spouse of [REDACTED] and the biological mother of the minor Child, [REDACTED], are engaged in pending litigation in [REDACTED] in large part regarding parenting time, and have been since [REDACTED] and before. See attached Exhibit 1.

6. That in the related post-dissolution matter, Mother has filed at least three (3) motions to continue, and filed this adoption matter the day before the final hearing set on parenting time in [REDACTED] on [REDACTED].
7. That the timing of [REDACTED] filing concerns me as to the reasoning for the Adoption Petition, as this is a pattern of ongoing activities by Mother to try to keep my children from me.
8. That I filed a Petition for Contempt on or about [REDACTED] regarding parenting time with the Children, [REDACTED] and [REDACTED].
9. That I have been litigating regarding parenting time since [REDACTED], and my parenting time is only suspended due to an alleged failure to appear for a hearing that I did not have proper notice about, as it was sent to an old address.
10. That I am current on my child support obligation for [REDACTED] at this time, and I continue to pay support pursuant to the Court Order.
11. That I have attempted to maintain my relationship with [REDACTED]; however, [REDACTED] has prevented same.
12. That to my best information and belief, [REDACTED] has changed her telephone number since [REDACTED] or has blocked me from telephone communication, and I had no other means of contacting [REDACTED].
13. That I reside with my mother, the Paternal Grandmother of the Children, and [REDACTED] has denied any meaningful access between [REDACTED] and her Paternal Grandmother for several years as well.
14. That it is in the best interests of [REDACTED] to continue her relationship with me, her biological Father, and it would be detrimental to her to terminate our relationship

and not in her best interests. Further, I am a loving Father who can and desires to be a part of my children's lives.

15. That further, termination of my parental rights, would be a violation of my constitutional rights as a parent to raise my children.

16. That [REDACTED] is presently [REDACTED] years old, and can have a meaningful and appropriate relationship with both myself and her stepfather, [REDACTED], without termination of our relationship or adoption.

17. That I want to maintain my relationship with and for [REDACTED] regardless of conduct by [REDACTED] to deny same.

WHEREFORE, I, [REDACTED], in person and by Counsel pray the Court set a hearing on the contested Adoption Petition, that the Court deny the adoption after hearing, and for all other relief just and proper in the premises.

[REDACTED] [REDACTED] [REDACTED] _____

[REDACTED]

Verification

The undersigned affirms under the penalties of perjury that the foregoing representations are true.

[REDACTED] [REDACTED] [REDACTED] [REDACTED] _____

[REDACTED]

Respectfully submitted,

CIYOU & DIXON, P.C.


Jessica K. Keyes, Attorney for Father

Jessica K. Keyes

CIYOU & DIXON, P.C.

320 North Meridian Street

Suite 600

Indianapolis, Indiana 46204

Telephone: 317-972-8000

Facsimile: 317-955-7100

