

IN THE SEPARATE JUVENILE COURT OF DOUGLAS COUNTY, NEBRASKA

IN THE INTEREST OF	)	JV15-78
	)	
KIYAH MILLER	)	MOTION TO ALLOW OUT OF
	)	STATE TRAVEL
	)	
Child(ren) Under 18 Years of Age	)	Judge Vernon Daniels

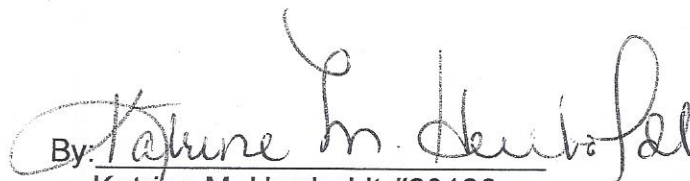
COMES NOW Katrine M. Herrboldt, guardian ad litem for the above-referenced child in interest, and moves this court for an Order allowing the minor child to travel out of state with the kinship care provider. In support of this Motion, the guardian ad litem states as follows:

1. The minor child has previously taken summer vacation trips with her current kinship care providers, Mike and Carol Simonsen, and her older brother, Devonyle Holloway.
2. The kinship care providers are requesting that the minor child, Kiyah Miller, be allowed to travel with them and her brother, Devonyle, on a trip to Universal Studios in Florida departing on 31 May, 2016 and returning to Omaha on 4 June, 2016.
3. Mike and Carol Simonson have agreed to provide flight information, travel itineraries, telephone contact information, and any other requested information with regard to the proposed trips.
4. The kinship care providers are requesting that the minor child, Kiyah Miller, be allowed to travel with them and her brother, Devonyle, on a trip to Des Moines, Iowa departing on 1 July 2016 and returning to Omaha on 3 July, 2016.
5. The Family Permanency Specialist should be able to arrange for "make up visits" for any regularly scheduled visits with the parents that may be missed due to the minor child's vacation travel.

6. The guardian ad litem has consulted with Paulette Merrell- Deputy County Attorney, John Baker- NDHHS Legal Counsel, Susanne Dempsey-Cook- attorney for the Intervenors, and Brian Muench- attorney for the Father, all who stated that they have no objection to the proposed travel agenda for the minor child.
7. The Guardian ad litem has unsuccessfully attempted to obtain a response from the mother, Cindi Miller, regarding the request, via e-mail in the absence of updated contact information.
8. The guardian ad litem believes that the proposed travel plans would be a positive and beneficial experience for the minor child as well as consistent with her normal summer routine.

WHEREFORE the guardian ad litem requests this Court issue an Order allowing the kinship care providers to travel with the minor child, Kiyah Miller, to the Universal Studios in Florida, departing on 31 May, 2016 and returning to Omaha on 4 June 2016, travel to Des Moines, Iowa departing on 1 July 2016 and returning to Omaha on 3 July, 2016, and for any further relief the Court deems necessary or appropriate.

Dated this 28th day of March, 2016.

By: 

Katrine M. Herrboldt #23180

PO Box 460852

Papillion, NE 68046-0852

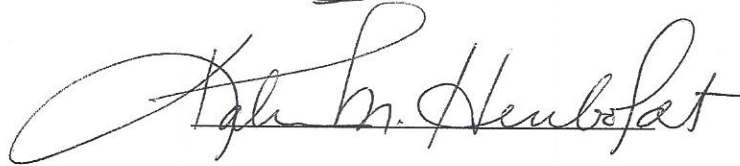
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legist_kmherrboldt@cox.net

Guardian ad Litem for the Minor Child

NOTICE OF HEARING

TAKE NOTICE, the above and foregoing will be called for hearing before the Honorable Vernon Daniels, Juvenile Court Judge, Room 600 of the Douglas County Hall of Justice, 17th and Farnam Streets, on the 16th day of May, 2016, at 1:45 a.m./p.m. or as soon thereafter as counsel may be heard.



CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion and Notice of Hearing was hand delivered and/or sent via inter-office distribution or U.S Postal Service, postage prepaid to the following on the 28th day of March 2016:

Paulette Merrell
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