

## **DIVORCE & CHILD CUSTODY CASES - ADVICE & TO DO LIST**

1. Be very careful what you say to or around the other party. They may be audio or videotaping you without your knowledge. They may also be saving your texts & e-mails as well. In some cases, they may have even hired a private investigator to follow you.
2. Provide us with a list of witnesses we can call to help you at court. Please include their address, phone numbers, whether they will need to be subpoenaed to testify or show up voluntarily, and a short statement about what each witness can testify to. Call them and let them know about the court date to see if they will show up, and let them know we may contact them. Also, give us the same info on any witnesses you think the other party might call too.
3. Start gathering up and making copies of all relevant legal and financial documents, such as: driver's licenses, social security cards, tax returns, pay stubs, birth and marriage certificates, passports, tax returns, pay stubs, retirements information, property deed records, bills (mortgage, car and credit card statements), school records, medical records, texts, e-mails, etc. Also make a list of, and take pictures and/or videotape or all your significant assets, in case they go missing later.
4. In custody dispute cases, give us approximately 25 pictures with you and the kids around the house and city participating in various fun, educational, or extra-curricular activities. Show them growing up with you at different ages, holidays, activities, etc. Also, take a few pictures of the neighborhood, apartment or house (nice clean living room, fully stocked fridge and pantry, and child's room).
5. Also, in custody cases, get us copies of school records (report cards, attendance reports, behavioral reports) daycare records, medical records (including immunization records), extra-curricular activity records, awards, certifications, baptismal certificates, etc. related to the children. .
6. Also, in custody cases, make sure you know all relevant basic info about your children, including: date of birth; social security #, shoe size, shirt size, favorite food, special medical needs, allergies, doctors, teachers, classes, friends, etc. Be able to explain exactly how you are a good parent, and/or why the kids are better off with you. Be as involved as you can in your children's life. Have plans in case of emergencies, and be able to show that you know where your children are at all times, and that your children, and/or their supervisors, know how to contact you at all times. Know the names, addresses and phone numbers of the family doctor, dentist, and all person's responsible for your children, including baby sitters. This would also include a list of friends and family who could help you with the children in an emergency.
7. Keep a journal/diary on a daily basis or as events relevant to your spouse or children occur, especially of their behavior before and after visitation periods. In your diary or calender begin keeping a record of key events in your children's daily life. Compare your role in your children's life to the other party's role.

8. Also, try not discuss details of the case with the children. Try to leave them out of any dispute as much as possible. Do not force them to be in the middle, or choose sides. Judges do not like to see that.
9. Never violate a court order regarding the children, or give the other party any other excuse to make you look bad in court. Show the Court you are trying to be reasonable.
10. Be patient. Remember the Court system is not perfect, and often a slow and unpleasant process.

**PLEASE PROVIDE ELECTRONIC VERSIONS OF ALL DOCUMENTS & PICTURES REQUESTED WHENEVER POSSIBLE. YOU CAN E-MAIL THEM TO US, OR PUT THEM ON A DISK OR THUMB DRIVE AND DROP THEM OFF AT OUR OFFICE. (IF SENT BY E-MAIL, PLEASE TRY TO GROUP ITEMS INTO JUST A FEW E-MAILS INSTEAD OF SENDING 10 OR MORE E-MAILS). YOU CAN ALSO USE DROP-BOX OR ONE DRIVE AS WELL.**

**ALSO PLEASE TRY TO GET THEM TO US AT LEAST 2 WEEKS PRIOR TO ANY COURT HEARING SO THAT WE HAVE TIME TO REVIEW, ORGANIZE, AND MAKE COPIES OF THEM. IF YOU WAIT UNTIL THE LAST MINUTE, THEN WE WILL REQUIRE THAT YOU PRODUCE 3 PHYSICAL COPIES OF EACH, BECAUSE THAT IS HOW MANY WE NEED TO TAKE TO COURT IF WE WANT TO INTRODUCE THEM INTO EVIDENCE.**

**PICTURES SHOULD BE RENAMED TO IDENTIFY THE PARTIES AND LOCATION IN THEIR NAME.**