

NO. 2005CM\_\_\_\_\_

IN THE INTEREST OF

§  
§  
§  
§  
§

IN THE DISTRICT COURT

EL PASO COUNTY, TEXAS

A CHILD

\_\_\_\_\_ JUDICIAL DISTRICT

**ORIGINAL PETITION  
TO TERMINATE PARENT-CHILD RELATIONSHIP**

1. Discovery Level

Discovery in this case is intended to be conducted under level 2 of the rule 190 of the Texas Rules of Civil Procedure.

2. Petitioner

This suit is brought by \_\_\_\_\_, an authorized agency, located at \_\_\_\_\_, El Paso, Texas.

3. Jurisdiction

No court has continuing jurisdiction of this suit or of the child the subject of this suit.

4. Interstate Placement Information

A sworn allegation or statement complying with section 162.002(b) of the Texas Family Code is attached to this petition and incorporated for all purposes.

5. UCCJEA Information

Required by section 152.209 of the Texas Family Code is provided in the attached affidavit.

6. Child

The child the subject of this suit is:

██████████, a male child, born on ██████████ in El Paso,  
El Paso County, Texas.

7. Persons Entitled to Citation

The mother of the child is ██████████, who is █ years of age, and who resides in El Paso County, Texas. No service is necessary at this time.

The child has no presumed father. An affidavit of status, executed by the mother, is or will be filed herein. The affidavit of status states that the alleged or probable father of the child is ██████████ and whose last name is unknown and whose place of residence and whereabouts are unknown. Said affidavit of status also states that there is a possible father whose name and whereabouts are unknown, however it is believed that he may live in the Los Angeles, California area. Petitioner has insufficient information and is unable to identify said alleged unknown father. Citation by Publication is necessary for the reasons set forth in the attached affidavits. Petitioner will conduct a search of the Paternity Registry of the State of Texas. On final hearing of this suit, Petitioner will submit to the Court an affidavit containing sufficient facts to prove that Petitioner has exercised due diligence in attempting to locate the identity and whereabouts of "Esteban" aka Steven, the alleged or probable father, and of the the alleged unknown possible father.

There are no court-ordered conservatorships, court-ordered guardianships, or other court-ordered relationships affecting the child the subject of this suit.

8. Property

No property is owned or possessed by the child the subject of this suit.  
of the Texas Family Code.

9. Termination Sought - Alleged Father

The parent-child relationship between the alleged or probable father of the child the subject of this suit, [REDACTED], does not exist in law or in fact.

If any parent-child relationship does exist, has ever existed, or could ever exist between either of these alleged or probable fathers, which is not admitted but is denied, it is in the best interest of the child that such relationship be terminated, and such termination is requested.

As grounds, Petitioner further alleges that before this case is heard the above named alleged or probable father [REDACTED], voluntarily, and with knowledge of the pregnancy, abandoned the child's mother beginning at a time during her pregnancy with the child and continuing through the birth, failed to provide adequate support or medical care for the mother during the period of abandonment before the birth of the child, and remained apart from the child or failed to support the child since the birth.

Petitioner requests that any parental rights of the alleged or probable father, [REDACTED], in the child be terminated pursuant to section (b) of the Texas Family Code if, after being served with citation in this suit, [REDACTED] does not respond by timely filing an admission of paternity or by filing a counterclaim for paternity or for voluntary paternity to be adjudicated under chapter 160 of the Texas Family Code before the final hearing in this suit.

As grounds for termination Petitioner alleges that before this case is heard, the alleged or probable father [REDACTED], will not have registered with the paternity registry under subchapter D, chapter 160 of the Texas Family code and, after the exercise

of due diligence of Petitioner, the alleged or probable father's location is unknown. A certificate from the bureau of vital statistics reflecting no registration relating to the alleged or probable father has been found will be filed with the Court before the final hearing.

If any parent-child relationship does exist, has ever existed, or could ever exist between [REDACTED], the alleged or probable father, and the child, which is not admitted but is denied, it is in the best interest of the child that such relationship be terminated, and such termination is requested.

The parent-child relationship between the child and the alleged unknown father does not exist in law or in fact.

If any parent-child relationship does exist, has ever existed, or could ever exist between the alleged unknown father, which is not admitted but is denied, it is in the best interest of the child that such relationship be terminated, and such termination is requested.

As grounds, Petitioner further alleges that before this case is heard said alleged unknown father voluntarily, and with knowledge of the pregnancy, abandoned the child's mother beginning at a time during her pregnancy with the child and continuing through the birth, failed to provide adequate support or medical care for the mother during the period of abandonment before the birth of the child, and remained apart from the child or failed to support the child since the birth.

Petitioner requests that any parental rights of the alleged unknown father in the child be terminated pursuant to section (b) of the Texas Family Code if, after being served with citation in this suit, said alleged unknown father does not respond by timely filing an admission of paternity or by filing a counterclaim for paternity or for voluntary paternity to be adjudicated under chapter 160 of the Texas Family Code before the final hearing in this

suit.

As grounds for termination Petitioner alleges that before this case is heard, the alleged unknown father will not have registered with the paternity registry under subchapter D, chapter 160 of the Texas Family code and, after the exercise of due diligence of Petitioner, the alleged unknown father's identity and location are unknown. A certificate from the bureau of vital statistics reflecting no registration relating to the alleged unknown father has been found will be filed with the Court before the final hearing.

If any parent-child relationship does exist, has ever existed, or could ever exist between the alleged unknown father and the child, which is not admitted but is denied, it is in the best interest of the child that such relationship be terminated, and such termination is requested.

The parent-child relationship between the child and an unnamed or unknown father does not exist in law or in fact.

If any parent-child relationship exists, has ever existed or could ever exist between the child and an unknown or unnamed father, which is not admitted but is denied, it is in the best interest of the child that such relationship be terminated, and such termination is requested.

11. Managing Conservator

Petitioner is requesting the appointment of [REDACTED] as managing conservator and such appointment is in the best interest of the child.

12. Ad Litem

Petitioner requests the Court to appoint a guardian ad litem to represent the interest of the child.

13. Attorney Ad Litem

Petitioner requests the Court to appoint an attorney ad litem to represent the interest of [REDACTED].

Petitioner requests the Court to appoint an attorney ad litem to represent the interest of the alleged unknown father.

14. Attorney's Fees

It was necessary to secure the services of \_\_\_\_\_ a licensed attorney, to preserve and protect the child's rights. Petitioner requests that in the event that this suit is contested or a counter-claim filed by a Respondent herein that said Respondent should be ordered to pay a reasonable attorney's fee and ordered to reimburse petitioner all medical and maternity care expenses incurred herein, and a judgment should be rendered in favor of this attorney and Petitioner and against said Respondent.

15. Sealing of Records

Petitioner requests the Court to order the sealing of the file and the minutes of the Court.

16. Prayer

Petitioner prays that citation and notice issue as required by law. Petitioner prays

that the Court enter its decree in accordance with the allegations of this petition.

Petitioner prays for attorney's fees and other costs.

Petitioner prays for general relief.

Respectfully submitted,

---

State Bar No [REDACTED]  
Attorney for Petitioner

[REDACTED]  
El Paso, Texas 79925  
[REDACTED]