

IN THE UTAH COURT OF APPEALS

STATE OF UTAH)
IN THE INTEREST OF)
)
)
)
_____,)
Children under 18 years of age.)
)
)
____)
)
Respondent Appellant)
)
)

**PETITION ON APPEAL [CROSS-
APPEAL]**

Court of Appeals No. _____
Juvenile Court No. _____

Appellant _____, through counsel, _____,
submits this Petition on Appeal from a final order of the ____ District Juvenile Court in a
child welfare proceeding pursuant to Utah Rule of Appellate Procedure 55.

1. PARTIES and COUNSEL: The names of the parties involved in this appeal, and the
names, addresses and telephone numbers of their respective attorneys, are as follows:

Appellant:

Appellant's Counsel:

Appellee:

Appellee's Counsel:

Children and Dates of Birth:

Guardian ad Litem:

2. ORDER SOUGHT TO BE REVIEWED: This appeal is from an order entered on _____, 200____, a copy of which is attached. This order:

- ___ Adjudicated the children as abused, neglected, and/or dependent ;
- ___ Terminated Appellant's parental rights to the children _____;
- OR
- ___ Dismissed a petition to terminate Appellant's parental rights to the children _____; OR
- ___ Other _____

3. RELIEF APPELLANT SEEKS ON APPEAL (Reversal, remand, other):

4. POST-JUDGMENT MOTIONS: The following post-judgment motions have been filed in the trial court in this matter: _____

5. RELATED APPEALS: Describe any related appeals involving the children (provide name of case, appellate case number, order being appealed from (i.e. appeal from adjudication, disposition), or orders previously appealed): _____

6. RELEVANT DATES: The following dates are relevant to this appeal:

- a) Date of removal(s):
- b) Date of adjudication(s):
- c) Date of disposition(s):
- d) Date of permanency hearing(s):
- e) Date of order(s) terminating Appellant's parental rights or dismissing petitions to terminate Appellant's parental rights:
- f) Date notice of appeal filed:
- g) Any other dates relevant to this appeal:

7. STATE THE MATERIAL FACTS AS THEY RELATE TO THE ISSUES PRESENTED FOR APPEAL (attach separate sheet if necessary):

Note: The fact statement should be concise and should focus on those facts necessary to a proper understanding of the procedural history of the case and those facts relevant to the issues Appellant wishes to raise on appeal.

8. STATE THE LEGAL ISSUES PRESENTED FOR APPEAL, INCLUDING A STATEMENT AS TO HOW THE ISSUES AROSE AND HOW THEY WERE PRESERVED FOR APPEAL:

Note: The issue statement should be concise in nature setting forth specific legal questions. General conclusions, such as “the trial court erred” or “The trial court’s decision is not supported by the law or the facts” is insufficient. Include legal authority that both support’s Appellant’s case and authority contrary to Appellant’s case, if known:

a) Issue 1

Involves(circle all that apply) personal jurisdiction; subject matter jurisdiction; sufficiency of evidence; weight of evidence; credibility of witness; interpretation of evidence; admissibility of evidence; adequacy of findings; application of law; interpretation of law; other_____.

State Issue:_____.

Describe at what point error occurred:_____.

This issue ____ was ____ was not preserved. If issue was preserved state how:_____.

State legal authority for issue: _____.

b) Issue 2

Involves(circle all that apply) personal jurisdiction; subject matter jurisdiction; sufficiency of evidence; weight of

evidence; credibility of witness; interpretation of evidence; admissibility of evidence; adequacy of findings; application of law; interpretation of law; other_____.

State Issue:_____.

Describe at what point error occurred:_____.

This issue ____ was ____ was not preserved. If issue was preserved state how:_____.

State legal authority for issue: _____.

c) Additional Issues (attach separate sheet)

9. ATTACHMENTS: The following necessary attachments are included with this petition (all of the following must be submitted) :

a) a copy of the order, judgement or decree on appeal

b) a copy of any rulings on post-judgement motions

Appellant requests that the appellate court grant Appellant the relief requested, or, in the alternative, set this matter for full briefing.

DATED this the ____ day of _____, 20__.

Counsel for Appellant
Name Address, Phone #

CERTIFICATE OF SERVICE

I certify that I caused to be mailed by first-class postage prepaid, a true and correct copy of the foregoing Petition On Appeal From Juvenile Court Child Welfare Proceeding on _____, 200_____ to the following:

[Opposing Counsel]
[address]

[Any Other Parties]
[address]

May 3, 2004