

IN THE FAMILY COURT OF THE STATE OF DELAWARE

IN AND FOR NEW CASTLE COUNTY

[REDACTED]

Petitioner,

v.

[REDACTED]

Respondent.

File No.: CN18-05896

Petition No.: 15- 39427

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FAMILY COURT
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INTERIM STIPULATION REGARDING CUSTODY

After multiple days of a full hearing on the merits, the Court announced its interim custody decision from the bench on October 24, 2016. Consistent with the Court's Order and including provisions recommended by Linda Gottlieb, LMFT, LCSW-R, it is HEREBY ORDERED this 28th day of October, 2016 as follows:

1. The parties shall engage in intensive reunification therapy with Linda Gottlieb, LMFT, LCSW-R, in Dutchess County, New York. Each parent shall fully cooperate with the recommendations of Ms. Gottlieb.
2. The counseling in New York shall commence on November 4, 2016.
3. Before November 4, 2016, Mother shall provide a letter to each child stating that she supports the reunification process and expects them to fully cooperate with the therapy. She will also state in the letters that it is imperative for each child to have a meaningful relationship with their Father in their lives, and she will further specify what positive qualities their Father has to offer to each of the children separately. Mother shall provide copies of the letters to Ms. Gottlieb for her review and approval prior to giving the letters to the children. If Ms. Gottlieb has concerns over the content in one or both of the letters, Mother shall work with Ms. Gottlieb on revisions until Ms. Gottlieb approves the content of both letters. Upon Ms. Gottlieb

approving the consent, the letters shall be provided to the children at a time and in a manner established by Ms. Gottlieb.

4. Mother shall accompany [REDACTED] and provide him with transportation to Dutchess County, New York and transition him to the temporary legal custody and care of his Father in the office of Linda Gottlieb at 10:00 am on November 4, 2016. Mother shall promptly depart the office of Linda Gottlieb upon transitioning [REDACTED] to Father's care, shall promptly leave the area and shall remain at least 100 miles away from Ms. Gottlieb's office for the duration of the therapy.

5. Father shall have temporary sole legal custody and primary residential custody of [REDACTED] as of November 4, 2016 at 10:00 until further Order of the Court.

6. Father shall have temporary sole legal custody and primary residential custody of [REDACTED] as of October 24, 2016 until further Order of the Court. Father and any relatives of his choosing shall accompany [REDACTED] and provide [REDACTED] with transportation to Dutchess County, New York on November 4, 2016.

7. The children shall begin a Therapeutic Vacation, including intensive reunification therapy (known as Turning Points 4 Families) with Father and Father's extended family at 10:00 am on November 4, 2016 in the office of Ms. Gottlieb. Both parties shall fully cooperate with the intensive reunification therapy.

8. There shall be a sequestration period between the children and Mother beginning on October 25, 2016 for [REDACTED] and November 4, 2016 at 10:00 a.m. for [REDACTED]. During the sequestration period, Mother shall not have any direct or indirect physical contact, telephone contact, electronic contact or any other form of contact/communication with the children, including with the children's schools unless directed in writing by Ms. Gottlieb. Mother shall not leave messages for the children with third parties or attempt to relay any messages to the children through third parties during the sequestration period. The length of the sequestration

period will depend on the progress of the children and the progress of Mother in supporting Father's relationship with the children, cooperating with parent education services and making meaningful progress in appropriate individual therapy.

9. Mother shall accept parent education services, specifically addressing the family dynamic of parental alienation, with Ms. Gottlieb telephonically. The frequency and duration of the parent education services contact shall be determined by Ms. Gottlieb.

10. The parties shall share the cost of this Therapy on a 77% Father / 23% Mother basis. Mother shall pay Father \$2,783 on or before November 1, 2016. If Mother fails to pay her \$2,783 in a timely manner, the issue of whether or not Father shall be receive a credit against his child support arrears for advancing Mother's portion shall be decided by the Court as part of the final custody Order of this Court or by Motion if filed by Father in advance of the review hearing. If Mother fails to comply, Father may request the court to reconsider the percentage division, a division of the additional incidental expenses for the children associated with participating in the program and attorney's fees for having to raise the issue with the Court.

11. Mother shall engage a local therapist qualified and trained in high conflict cases, that is acceptable to Ms. Gottlieb, to address Mother's behaviors (intentional and unintentional) that have been unsupportive of the relationship between Father and the children, to understand and acknowledge the psychological ramifications to the children, and to recognize that it is in the children's best interest to have a relationship with Father. Mother shall sign any releases required to authorize her therapist to collaborate with and release information to Ms. Gottlieb.

12. As a condition to the sequestration period ending, Mother's therapist must have provided documentation satisfactory to Ms. Gottlieb in her discretion, that Mother is ready, willing and able to support the relationship between Father and the children and will abstain from any additional concerning behaviors.

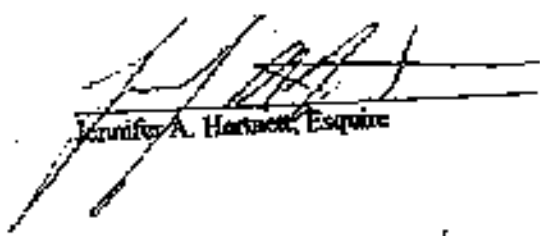
13. After the Therapeutic Vacation, Father may engage one or more a local therapist(s) to treat the children, with Ms. Gottlieb's assistance, to further the goal of reunification and recovery from alienation. The treatment modality shall be family therapy - the modality consistent with the principles of Turning Points 4 Families.

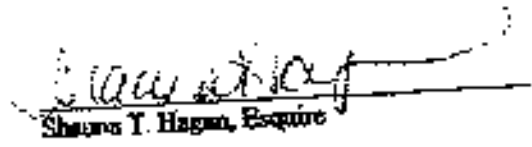
14. [REDACTED] Services shall cease and desist from any and all meetings, treatment, counseling or other contact with [REDACTED] and [REDACTED]. [REDACTED] shall cease and desist from any and all meetings, treatment, counseling or other contact with [REDACTED] and [REDACTED].

15. Mother, shall not engage or permit any mental health professional, counselor, psychologist, psychiatrist, life coach, guidance professional, or other similar or comparable individual or organization to treat, counsel, evaluate, observe or otherwise have any involvement with the children without Father's prior written consent or Court Order.

16. For purposes of school only, Mother's address shall remain the primary address for the children subject to further Order of the Court. Father shall reach out to both schools prior to November 4, 2016 regarding the Turning Points 4 Families program and about the willingness of each school to cooperate with the reunification process and the protocols of the program. If, in the written opinion of Ms. Gottlieb, [REDACTED] or [REDACTED] success in the Turning Points 4 Families program will be significantly and negatively affected by remaining in their current schools, Ms. Gottlieb shall convey the reasons for her opinion to Mother in writing. If Mother does not provide a written statement of agreement with the change in schools, Father shall file an Emergency Motion with the Court.

17. A review hearing shall be scheduled by the Court for a date/time convenient to the Court and counsel.


Jennifer A. Hartnett, Esquire


Shaun T. Hagan, Esquire

SO ORDERED this 28th day of Oct, 2016


JUDGE JANELL OSTROSKI