



Parental Alienation and Child Custody

June 10, 2019

9:00 a.m. – 11:00 a.m.

**Connecticut Convention Center
Hartford, CT**

CT Bar Institute Inc.

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Lawyers' Principles of Professionalism

As a lawyer I must strive to make our system of justice work fairly and efficiently. In order to carry out that responsibility, not only will I comply with the letter and spirit of the disciplinary standards applicable to all lawyers, but I will also conduct myself in accordance with the following Principles of Professionalism when dealing with my client, opposing parties, their counsel, the courts and the general public.

Civility and courtesy are the hallmarks of professionalism and should not be equated with weakness;

I will endeavor to be courteous and civil, both in oral and in written communications;

I will not knowingly make statements of fact or of law that are untrue;

I will agree to reasonable requests for extensions of time or for waiver of procedural formalities when the legitimate interests of my client will not be adversely affected;

I will refrain from causing unreasonable delays;

I will endeavor to consult with opposing counsel before scheduling depositions and meetings and before rescheduling hearings, and I will cooperate with opposing counsel when scheduling changes are requested;

When scheduled hearings or depositions have to be canceled, I will notify opposing counsel, and if appropriate, the court (or other tribunal) as early as possible;

Before dates for hearings or trials are set, or if that is not feasible, immediately after such dates have been set, I will attempt to verify the availability of key participants and witnesses so that I can promptly notify the court (or other tribunal) and opposing counsel of any likely problem in that regard;

I will refrain from utilizing litigation or any other course of conduct to harass the opposing party;

I will refrain from engaging in excessive and abusive discovery, and I will comply with all reasonable discovery requests;

In depositions and other proceedings, and in negotiations, I will conduct myself with dignity, avoid making groundless objections and refrain from engaging in acts of rudeness or disrespect;

I will not serve motions and pleadings on the other party or counsel at such time or in such manner as will unfairly limit the other party's opportunity to respond;

In business transactions I will not quarrel over matters of form or style, but will concentrate on matters of substance and content;

I will be a vigorous and zealous advocate on behalf of my client, while recognizing, as an officer of the court, that excessive zeal may be detrimental to my client's interests as well as to the proper functioning of our system of justice;

While I must consider my client's decision concerning the objectives of the representation, I nevertheless will counsel my client that a willingness to initiate or engage in settlement discussions is consistent with zealous and effective representation;

Where consistent with my client's interests, I will communicate with opposing counsel in an effort to avoid litigation and to resolve litigation that has actually commenced;

I will withdraw voluntarily claims or defense when it becomes apparent that they do not have merit or are superfluous;

I will not file frivolous motions;

I will make every effort to agree with other counsel, as early as possible, on a voluntary exchange of information and on a plan for discovery;

I will attempt to resolve, by agreement, my objections to matters contained in my opponent's pleadings and discovery requests;

In civil matters, I will stipulate to facts as to which there is no genuine dispute;

I will endeavor to be punctual in attending court hearings, conferences, meetings and depositions;

I will at all times be candid with the court and its personnel;

I will remember that, in addition to commitment to my client's cause, my responsibilities as a lawyer include a devotion to the public good;

I will endeavor to keep myself current in the areas in which I practice and when necessary, will associate with, or refer my client to, counsel knowledgeable in another field of practice;

I will be mindful of the fact that, as a member of a self-regulating profession, it is incumbent on me to report violations by fellow lawyers as required by the Rules of Professional Conduct;

I will be mindful of the need to protect the image of the legal profession in the eyes of the public and will be so guided when considering methods and content of advertising;

I will be mindful that the law is a learned profession and that among its desirable goals are devotion to public service, improvement of administration of justice, and the contribution of uncompensated time and civic influence on behalf of those persons who cannot afford adequate legal assistance;

I will endeavor to ensure that all persons, regardless of race, age, gender, disability, national origin, religion, sexual orientation, color, or creed receive fair and equal treatment under the law, and will always conduct myself in such a way as to promote equality and justice for all.

It is understood that nothing in these Principles shall be deemed to supersede, supplement or in any way amend the Rules of Professional Conduct, alter existing standards of conduct against which lawyer conduct might be judged or become a basis for the imposition of civil liability of any kind.

--Adopted by the Connecticut Bar Association House of Delegates on June 6, 1994



Lynda B. Munro

Member

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Lynda B. Munro, Connecticut Superior Court Judge (Ret.) is a member of the firm's Alternative Dispute Resolution (ADR) and Family Law practices. Her ADR practice focuses on resolution of family and civil disputes. She serves as a mediator, arbitrator, discovery master and private judge in civil matters and financial, custody and parenting disputes involving families and children, pre-nuptial agreements and post-nuptial agreements.

Former Judge Munro retired in 2014 after 20 years of distinguished service on the Connecticut bench. Most recently, Judge Munro served as a Presiding Judge for the Family Division of the New Haven Superior Court. She served as Chief Administrative Judge for Family Matters from 2008-2013 and Presiding Judge of the Regional Family Docket for seven years. She has assisted parties and counsel in resolving hundreds of couples and high-conflict family disputes.

Judge Munro has extensive experience in the area of civil matters. She has sat on the Complex Litigation Docket, special proceedings, jury and court trials. She both tried and mediated a wide array of tort and contract cases including commercial disputes, medical malpractice, legal malpractice and trade secrets matters. Additionally, Judge Munro was an affordable housing judge for many years. Judge Munro also is an American Arbitration Association (AAA)-qualified arbitrator.

Judge Munro is the only active mediator/arbitrator who sat on both the Complex Litigation Docket and the Regional Family Trial Docket in Connecticut. Because of her years of writing and trying cases to the bench, she is particularly well-suited to our Appellate practice.

During her judicial career, Judge Munro heard cases in the Meriden, New London, New Haven, Hartford, Waterbury, Middlesex and Stamford-Norwalk judicial districts. Before being sworn in as a Superior Court Judge in 1994, Judge Munro spent 15 years as a private practice attorney

Continued

representing municipalities, individuals and business entities in municipal, land use, civil and family matters.

The former chair of the Judicial Education Committee, Judge Munro taught classes in civil, general and family law to the Superior Court Bench for more than 10 years. She also taught numerous courses through the Connecticut Bar Association, the New England Bar Association, the Connecticut Chapter of Matrimonial Lawyers, the Connecticut Trial Lawyers Association and many other organizations, consortiums and associations. For the past six years, she has been an adjunct law professor at Quinnipiac Law School. In addition, she provides training in best practices in ADR to law firms.

Judge Munro serves on the editorial board of *Family Law Quarterly*, a publication of the American Bar Association. She is a Trustee Emeritus of Connecticut College and was recently awarded the Connecticut College Medal, the highest honor the College can confer, for her accomplishments and service.

Bar and Court Admissions

Connecticut

U.S. District Court, District of Connecticut

Education

J.D., Case Western Reserve University Law School, 1979

B.A., Connecticut College, 1976

Publications

"A Trial is All About the Appeal," *Best Lawyers*, June 1, 2017

"Administrative Divorce Trends and Implications," *American Bar Association Family Law Quarterly*,

"When a Complex Case Lands at Your Doorstep," *Previously published in the Connecticut Law Tribune*, May 15, 2016

"Early Mediation Can Facilitate Divorce Cases," *Connecticut Law Tribune*, November 24, 2015

"A Better Way: Family ADR-Mediation and Arbitration," *Connecticut Law Tribune*, December 16, 2014

Continued

Alerts and Newsletters

ALERT: Pullman Matrimonial Lawyers Convince the CT Supreme Court to Make Major Change Affecting the Finality of Judgments, March 20, 2018

Professional Affiliations

Connecticut Bar Association - Family Law and ADR sections; Coopers Fellow

American Bar Association - Family Law and ADR sections

Fairfield County Bar Association - board of directors; co-chair, ADR Committee

Collaborative Business Dispute Resolution Group of Connecticut

Connecticut Mediation Association - advisory board

Connecticut Counsel for Non-Adversarial Divorce

Association of Family Conciliation Courts

The Benchers

Child Support Guidelines Commission - 2010-2014

Family Commission - 2008-2015

Community Involvement

Connecticut College - trustee emeritus and member of the Executive Committee of the Council of Former and Emeritus Trustees

Family Law Quarterly - editorial board member

Quinnipiac University School of Law - adjunct law professor; Senior Distinguished Fellow of the Center on Dispute Resolution

Honors and Awards

Ranked first in the 2016 "Best Individual Arbitrator" and the "Best Individual Mediator," categories *Connecticut Law Tribune's* annual reader's choice "Best of" award

Listed in *The Best Lawyers in America* in the area of family law since 2017

Connecticut College Medal - 2014



Campbell D. Barrett

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Campbell D. Barrett chairs the Family Law practice which in 2017 was named the *Connecticut Law Tribune's* "Family Law Department of the Year." Campbell focuses primarily on matrimonial and appellate matters. He has been named a Top 50 Connecticut *Super Lawyer* and a Top 100 New England *Super Lawyer* multiple times. He has also been recognized multiple times by *Best Lawyers in America* in the area of family law. In 2017, he was named *Best Lawyers' "Family Law Lawyer of the Year for Hartford County."* Campbell has participated in hundreds of contested proceedings across the state in complex, high income/high net worth cases. In addition, he has been lead counsel on more than 50 appeals to the Connecticut Supreme and Appellate Courts.

Campbell is a fellow of the American Academy of Matrimonial Lawyers. He has served as an adjunct instructor at the University of Connecticut School of Law, has lectured and written frequently on appellate practice and family law, and has been a guest family law expert on National Public Radio. He is the co-author of the book, *Same Sex Marriage: the Legal and Psychological Evolution in America*, which in 2006 was awarded the American Psychological Association's "Most Distinguished Book in Lesbian, Gay, and Bisexual Psychology." He has also authored chapters in family law treatises on the definition of property and prenuptial agreements. Campbell was also the 2005 winner of the Hartford County Bar Association's Judge Maxwell Heiman Memorial Award.

Practice Areas

Family Law; Appellate Law

Representative Experience

Campbell has successfully argued numerous matrimonial law cases of first impression in the Connecticut Supreme and Appellate Courts, including those establishing:

- The operative definition of property for the equitable distribution of assets. *Mickey v. Mickey*, 292 Conn. 597 (2009).
- The recognition of postnuptial agreements in the state. *Bedrick v. Bedrick*, 300 Conn. 691 (2011).
- The parameters for child support in high income cases. *Dowling v. Szymczak*, 309 Conn. 390 (2013).
- The permissible use of capital gains in alimony modification cases. *Gay v. Gay*, 266 Conn. 641 (2003).
- The legal test for the modification of alimony based on a claim of cohabitation. *Gervais v. Gervais*, 91 Conn. App. 840 (2005).
- The award of significant lump sum alimony (\$7.5 million) in cases where a prenuptial agreement limits or precludes the distribution of assets. *Hornung v. Hornung*, 323 Conn. 144 (2016).
- The distinction between the modification standard for child support and alimony in cases where the payor has experienced an increase in income. *McKeon v. Lennon*, 321 Conn. 323 (2016).
- The recognition that complex executive compensation awards, such as stock options and restricted stock, constitute income for purpose of calculating child support. *McKeon v. Lennon*, 321 Conn. 323 (2016).

Bar and Court Admissions

Connecticut

New York

Education

Trinity College, B.A.

American University, Washington College of Law, J.D.

Publications

"A Trial is All About the Appeal," *Best Lawyers*, June 1, 2017

"The Connecticut Supreme Court's Decision in *Brody v. Brody*: Much Ado About Nothing?,"
Previously published in the Connecticut Law Tribune, May 15, 2016

Continued

"When a Complex Case Lands at Your Doorstep," *Previously published in the Connecticut Law Tribune*, May 15, 2016

"Are Expectancies Still Expectancies? How *Ferri v. Powell-Ferri* and *Reville v. Reville* Might Alter the Landscape in Property Distribution Cases," *Previously published in the Connecticut Law Tribune*, January 14, 2016

Professional Affiliations

American Academy of Matrimonial Lawyers - fellow

Connecticut Bar Association - former statewide chair of the Young Lawyer's Section Family Law Committee (2000-2004)

Hartford Bar Association - co-chair, Family Law Section

Oliver Ellsworth Inn of Court - Barrister - 2000 - 2003

Special Master in State Court

Hartford's Early Intervention Program - special master - 2007 - present

Community Involvement

Children's Law Center - board of directors (2009-2011)

Honors and Awards

Listed in *The Best Lawyers in America* in the area of Family Law since 2017

Selected to the *Connecticut Super Lawyers* list in Family Law and Appellate since 2010; named a Top New England *Super Lawyer* in 2016

Named one of the Top Ten Family Law Lawyers in Connecticut by the National Academy of Family Law Attorneys - 2014

Recipient of the *Connecticut Law Tribune's* "New Leader of Law" award - 2002

Selected as a James W. Cooper Fellow by the Connecticut Bar Foundation - 2004

Judge Maxwell Heiman Award by the Hartford County Bar Association - 2005

Sue A. Cousineau

Sue A. Cousineau is a graduate of Northwestern Connecticut Community College, the University of Connecticut and the University of Connecticut School of Law. Attorney Cousineau has been in private practice for over thirty years having dedicated the majority of her career to representing children in Connecticut's Probate, Juvenile and Family Courts. Currently, her practice focuses primarily on Guardian ad litem work in Connecticut's Family Court System. Additionally, Attorney Cousineau is a trained family mediator who volunteers at Community Mediation in Hamden and a trained parent coordinator.

Attorney Cousineau has served on the Advisory Board of the Office of the Child Advocate, the Board of Directors for AFCC's Connecticut Chapter, the Statewide Grievance Committee, the Governor's Task Force on Justice for Abused Children, the Child Protection Commission's Working Group on Standards for Attorneys Representing Parents in Child Protection Matters, the Advisory Committee for the Connecticut Public Interest Law Journal and the Center for Children's Advocacy's Symposium - Public Access to Juvenile Court Child Protection Proceedings, and as co-chair of the Judiciary Committee of the Connecticut General Assembly's Task Force to Study Legal Disputes Involving the Care and Custody of Minor Children.

Bruce Freedman, Ph.D.

Bruce Freedman is a licensed psychologist who has been in clinical practice in CT for over 30 years. He holds a Bachelor of Science, a Master's of Science, and a Ph.D. in Clinical Psychology with a specialty in Family Psychology from Georgia State University. Since arriving in Connecticut Dr. Freedman has worked at the Village for Children and Families, the Wheeler Clinic, Grove Hill Clinic and Gaylord Hospital Alcohol Treatment Unit before devoting himself to full-time private practice. Bruce has seen adults, couples, children, adolescents and families throughout his clinical practice. Dr. Freedman has provided services within the Connecticut court system for over 25 years. He has performed over two thousand family evaluations, almost exclusively ordered by the court or agreed to by all parties. He has consulted to courts around the state, and has provided mediation and parenting coordination services during and after divorce. He is a trained mediator and collaborative divorce coach, and has worked with many local family law attorneys. Dr. Freedman is past President and member of the Family Study Center of Hartford, a long-standing member of the National Register of Practicing Psychologists, and member of the American Psychological Association and Connecticut Psychological Association. He also belongs to the Connecticut Collaborative Divorce Group. Dr. Freedman has presented to professional groups on a variety of topics including: domestic violence, child sexual abuse, parental alienation, and parent-child reunification services.

Parental Alienation and Child Custody (CLC2019-A05)

Agenda

1. Parental alienation – what it is, and what it isn't – Panel discussion – 15 min.
2. How to recognize parental behaviors which contribute – Panel discussion – 15 min.
3. What to do about it:
 - a. Parent's counsel – Campbell Barrett – 20 min.
 - b. Child's representative – Sue Cousineau – 20 min.
 - c. Mental health professionals – Dr. Bruce Freedman – 20 min.
 - d. Courts – Judge Lynda Munro (ret.) – 20 min.
4. Question and Answer session – 10 min.

EXAMPLES OF BEHAVIORS THAT CONTRIBUTE TO ALIENATION

- Making the child your confidante by sharing information about the separation and/or custody issues
- Blaming the other parent for any negative effects of the separation, such as financial or schedule related issues. (Sorry you can't have those sneakers, because your other parent has all the money and I have nothing) (Sorry you can't go to the XXX with me, because you will be with your other parent)
- Scheduling fun and attractive events on the other parent's time
- Allowing the child to choose whether to follow the schedule or not.
- Restricting the other parent's information stream regarding activities or events for the child.
- Not including the other parent on the school emergency contact sheet or the little league or ballet contact list (including email lists)
- Failing to support the other relationship and not requiring good manners from their child regarding the other parent. (They would never let their child act that way towards a favored relative, like an aunt)

The justifications are numerous: it's their life, they need to know the "truth" or why wouldn't the other parent want the child to take advantage of a good opportunity, even if on their time, don't they want what's best for the child?

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PARENTAL ALIENATION:

Brief history: from Richard Gardner's coining of the term to refinements over the past 34 years.

Current conception: A continuum from normal divorce conflict to active attempts to denigrate or marginalize the other parent

Alienation has become a toxic, charged term of limited utility. The general term refers to cases in which a child strongly prefers one parent, and sometimes avoids and refuses to see the other. The original concept of alienation is now considered part of a phenomenon with one or more of the following factors present:

1. Parental alienation- by definition an active campaign, whether deliberate or unconscious, to damage a child's relationship with the other parent. By Gardner's original definition, alienation can be mild, moderate or severe. Severe cases are the ones we hear horror stories about.
2. Estrangement- a strained or non-existent parent-child relationship is the result of actual problems, such as an extended lack of contact with the child, a loss of interest or effort made for the relationship, abuse or neglect, domestic violence, mental health or substance abuse problems, etc.
3. Enmeshment- an overly close, perhaps symbiotic parent-child relationship, sometimes caused by clinical anxiety in the child and/or parent, causing difficulty for the child in separating from that parent
4. Alignment- a substantial preference by the child for one parent, with corresponding less interest in the other parent. For example, a forced 50-50 relationship may exacerbate a child's preference to spend more time with one parent or the other

When one or more of these factors is present, the child's time with one parent may diminish or stop altogether. This can heighten conflict between the parents, create repeated court proceedings, child protection involvement, involvement of

other family and friends in the war, and the initiation of interventions which worsen the problem (e.g. inappropriate child therapy, police calls or exchanges) If a child's time with one parent stops completely, the problem will steadily worsen and become entrenched for all involved. This emphasizes the importance of early intervention. As soon as contact with one parent ceases, this becomes an urgent matter in which serious harm may come to a child.

Involved professionals may help or hurt children's interests depending on their full knowledge, training and experience. Aggressive attorneys, therapists treating dubious trauma, extended mediation and parenting coordination efforts may all add to the parents' and child's difficulties. All of these factors may add to the period of time without contact, either deliberately or unwittingly. The potential harm and damage to the parent-child relationship continues to increase over time.

Severe alienators may be unaware of their behavior and its effects on a child. Their behavior may also represent a combination of deliberate efforts to undermine the other parent and manifestations of being a "high-conflict parent," a term suggested by Bill Eddy as less inflammatory than "personality disorder." Language is important because certain terms end up part of name-calling in contested court proceedings.

Family interaction research has shown a lack of support for the theory that children may often be traumatized by a change in custody. Any intervention must be tailored to the child and family circumstances. The sooner the intervention, the easier it is to remedy whatever problems may be present.

DOCKET #: XXXXXXXXXXXXXXXX : SUPERIOR COURT

: J.D. OF XXXX
VS. : AT XXX

: _____, 2019

GUARDIAN AD LITEM’S PROPOSED ORDERS

RE: FAMILY INTERVENTION THERAPY

1. The parents and the minor child shall participate in family intervention counseling with the goal of attempting to restore the relationship between the minor child and the father.
2. **Neither parent shall discuss or allow anyone else to discuss the intervention therapy at all with the minor child until such time as the family intervention counselor has indicated how the information should be provided to the minor child.** This includes, but is not limited to, telling the minor child that they are meeting with a therapist to discuss this possibility, that the court ordered this type of therapy or that the child and/or the parents will have to cooperate with this therapy.
3. The primary goal of the family intervention therapy is to focus on the child’s needs and the child’s best interests. The specific goals include, but are not limited to, to facilitating and strengthening the minor child’s ability to maintain healthy relationships with both parents; helping him avoid being caught in the middle of his parents’ conflict; strengthening his critical thinking skills and helping him maintain balanced views of each parent; easing the minor child’s anxiety about his relationship with his father, readying the minor child for the resumption of a relationship with his father, assisting each parent to identify and address their behaviors that contribute to the estrangement of the minor child and his father with the family intervention counselor and/or with their individual

therapists, assessing each parents progress in accepting and engaging in behaviors that will support and encourage re-establishment of the father-son relationship and developing and implementing that re-establishment, if appropriate.

4. The family intervention counselor will be _____. Each party shall contact *Dr. XX* in the next three (3) days by emailing him/her at XXXXXX.com. *Dr. XX* will be solely in charge of how many, how often and how long the sessions will be, where they will be held, who will participate and who will not participate, and may include recommended times when father and the minor child may be together without her present, with or without a third party of her choosing present to monitor the contact. The parties shall cooperate with all aspects of scheduling and participation in sessions with *Dr. XX* and make themselves and the minor child available, except for good cause shown, for all appointments scheduled by *Dr. XX*. As indicted in *Dr. Y's* evaluation, the therapy may be fairly intensive at first, perhaps, including several sessions weekly. In light of the previously failed attempts at this process, it is imperative that each parent fully engage with the recommended schedule.
5. The parties will follow all recommendations made by *Dr. XX* unless the Court orders otherwise. *Dr. XX* shall notify the Guardian ad litem of any behavior by either party that frustrates the process.
6. The father shall, at his sole expense, present himself to _____ for a hair test every three months for a period of one year. Results of each test shall be provided to the guardian ad litem who may share the results with the father's therapist, the attorneys in the case and the family intervention therapist. Should any test be positive, the father shall undergo random urine screens approximately every other week. Those screens shall be

performed by _____ and the results shall be provided to the guardian ad litem who may share the results with the father's therapist, the attorneys in the case and the family intervention therapist.

7. Should the father not fully engage and cooperate with the family intervention therapy and any and all recommendations of the family intervention therapist or these court orders, the attempt at re-establishment of the relationship between father and son should be abandoned unless otherwise ordered by the Court.
8. Should the mother not fully engage and cooperate with the family intervention therapy and any and all recommendations of the family intervention therapist, the matter will return to court where the decision to remove the child from the mother's custody shall be strongly considered.
9. The parents shall sign Dr. XX's contract for services by _____ and be responsible as follows for the fees of *Dr. XX*, who shall charge \$ _____ per hour for her work in this matter.
 - a. Each parent shall pay 100% of any cost associated with any individual sessions they attend.
 - b. The parties shall share equally (50%/50%) the cost of any individual sessions for the minor child or any sessions that the minor child attends with a parent, regardless of which parent attends the session.
 - c. The parties shall share equally (50%/50%) the cost of any collateral work performed in support of the therapy, including, but not limited to contact with collateral sources, reading the evaluation, discussions with the guardian ad litem and/or attendance at court, if necessary.

- d. Complete billing statements should be copied to both parties and the guardian ad litem in order to foster transparency regarding all services, unless there is a clear therapeutic rationale not to do so. Neither party shall allow the minor child to see any billing statements nor shall they discuss the cost of the therapy with the minor child or allow any other person to do so.
10. The parents agree that the GAL and *Dr. XXX* shall have the ability to freely discuss the intervention therapy and any other topics that may assist the therapy and shall sign appropriate authorizations allowing same to occur.
11. The parties will sign authorizations allowing *Dr. XXX* to speak and share information with any professionals that she requests permission to speak to, including, but not limited to, Dr. Y, each parent's individual therapist, the child's therapist, a family therapist, the child's school, any therapists who previously provided services of any kind for any member of the family.
12. It is anticipated that following the intervention, a follow up Stipulation may be necessary for additional orders including, but not limited to, additional treatment recommendations, parenting access, etc. The parents agree that a signed Stipulation to that effect may be submitted to the Court without appearance. Should there be a disagreement as to future orders, the GAL may file a request for an immediate status conference on the issue seeking Court intervention.
13. The case shall be continued for a report back on in 30 days for a report on each parent's compliance with the process and any barriers to moving forward with the process.

Guardian Ad Litem

Parental Alienation Citations

Federal Expert Testimony Citations

- Daubert v. Merrell Dow Pharmaceuticals, 509 U.S. 579 (1993).
- Kumho Tire Co. v. Carmichael, 526 U.S. 137 (1999).

Connecticut Expert Testimony Citations

- State v. Porter, 241 Conn. 57 (1997).
- Connecticut Code of Evidence, §7-2 (2019).

Connecticut Parental Alienation and Parental Alienation Syndrome Citations

- Eisenlohr v. Eisenlohr, 135 Conn. App. 337, 348 (2012).
- Ruggiero v. Ruggiero, 76 Conn. App. 338 (2003).
- Bolat v. Bolat, Superior Court of Connecticut, Judicial District of New Haven, No. FA104042065S, 2014 WL 4099355 (Munro, J.) (July 15, 2014).
- Mastrangelo v. Mastrangelo, Superior Court of Connecticut, Judicial District of New Haven, No. NNHFA054012782S, 2012 WL 6901161 (Gould, J.) (Dec. 20, 2012).
- Snyder v. Cedar, Superior Court of Connecticut, Judicial District of New Haven, No. NNHCB010454296, 2006 WL 539130 (Pittman, J.) (Feb, 16, 2006).
- Coleman v. Coleman, Superior Court of Connecticut, Judicial District of Middlesex, No. FA020174562S, 2004 WL 1966083 (Munro, J.) (Aug. 5, 2004).

Parental Alienation Syndrome Expert Cases in Other States

- People v. Fortin, County Court, Nassau County, New York, 706 N.Y.S.2d 611 (2000).
- Montoya v. Davis, 156 A.D.3d 132, 135 (Supreme Court, Appellate Division, Third Department, New York, Nov. 30, 2017).
- Zafran v. Zafran, 740 N.Y.S.2d 596 (Supreme Court, Nassau County, New York, March 14, 2002).
- C.J.L. v. M.W.B., 879 So.2d 1169 (Ala. Civ. App. 2003).
- Pearson v. Pearson, 5 P.3d 239 (Supreme Court of Alaska 2000).
- Grove v. Grove, 386 S.W.3d 603 (Court of Appeals of Arkansas 2011).
- Oates v. Oates, 2010 Ark. App. 345 (2010).
- In re Marriage of Idelle C., Ovando C., California Court of Appeal, Second District, Division 1, 2002 WL 1764181 (July 31, 2002).
- People v. Sullivan, Court of Appeal, Sixth District, California, 2003 WL 1785921 (April 3, 2003).
- In re Marriage of Bates, 810 N.E.2d 714 (Supreme Court of Illinois 2004).
- In re Marriage of Rosenfield, 524 N.W.2d 212 (Court of Appeals of Iowa 1994).