

CIRCUIT COURT OF _____ COUNTY, MISSOURI

_____)
 _____)
 _____),
 SSN: XXX-XX-_____)
 Individually and as next friend for _____)
 _____),
 a minor, _____)
 and _____)
 _____),
 a minor, _____)
 SSN: XXX-XX-_____)
 _____)
 Plaintiffs, _____)
 vs. _____)
 _____),
 SSN: XXX-XX_____)
 _____)
 Defendant. _____)

Case No: _____

PETITION FOR DECLARATION OF PATERNITY, CUSTODY, AND SUPPORT

Come now the Plaintiffs, _____, by
and through their attorney, _____, and for this
cause of action state:

1. Plaintiff _____ (hereinafter referred
to as Plaintiff) has been a resident of the State of Missouri for at least 90 days
immediately preceding the filing of this petition, and is now residing at
_____, _____, in the County of
_____, State of Missouri.

2. Defendant _____ (hereinafter referred to as Defendant) has been a resident of the State of Missouri for at least 90 days immediately preceding the filing of this petition, and is now residing at _____, _____, in the County of _____, State of Missouri.

3. Plaintiff is currently employed earning \$_____ per month.

OR

4. Plaintiff is unemployed at this time but is capable of earning \$_____ per month.

5. Defendant is currently employed earning \$_____ per month.

OR

6. Defendant is unemployed at this time but is capable of earning \$_____ per month.

7. Plaintiff and Defendant were never married.

8. This action is being brought under the Uniform Parentage Act and this Court has jurisdiction in this cause pursuant to Section 210.829 RSMo. (1994).

9. _____ is a minor child _____ (years or months) of age and resides with _____ in _____ County, Missouri. (repeat for each such child)

10. Plaintiff has consented to serve and is bringing this action as next friend of the minor child.

OR

Plaintiff has brought this action against Defendant and the minor child and a Guardian ad Litem needs to be appointed for the minor child.

11. Plaintiff and Defendant had sexual intercourse with each other during the probable period of conception during which the minor child was conceived.

12. Plaintiff is without adequate funds to adequately care for and maintain the said minor child.

13. The minor child is without adequate funds for the child's support.

14. **Plaintiff Defendant** has health insurance available for the minor child through place of employment.

OR

15. **Plaintiff Defendant** is capable of providing for health insurance for the minor child at a reasonable cost.

OR

16. Neither parent has health insurance available for the minor child at a reasonable cost.

17. Since birth the minor child has resided with Plaintiff and Plaintiff has supported the minor child.

OR

18. Since birth the minor child has resided with Defendant and Defendant has supported the minor child.

19. Plaintiff has not participated in any capacity in any other litigation concerning the custody of the minor child in this or any other state except:

20. Plaintiff has no information concerning any custody proceeding regarding said minor child pending in any court of this or any other state; that Plaintiff knows of no other person not a party to this cause of action who has actual physical custody of said child, or claims to have custody or visitation rights with respect to said child.

21. The minor child is in need of medical, dental, orthodontic, prescription, and optical insurance coverage, including those amounts not covered by such insurance and Respondent is capable of providing such coverage.

22. The Birth Certificate of the minor child should be changed to reflect **Plaintiff Defendant** as the biological father of the minor child.

23. **(If applicable)** Blood testing has been completed or should be ordered in this matter and **Plaintiff Defendant** is able to pay said costs thereof.

24. Plaintiff and Defendant should be awarded joint legal and joint physical custody of the minor child per parenting plan filed with the Court.

OR

Plaintiff should be awarded sole legal custody and the parents should be awarded joint physical custody of the minor child per parenting plan filed with the Court.

OR

Plaintiff should be awarded sole legal and sole physical of the minor child per parenting plan filed with the Court.

WHEREFORE, Plaintiffs pray for a judgment of this Court declaring **Plaintiff Defendant** to be in fact the biological father of _____, born to **Plaintiff Defendant** on ____; establish monthly child support for the minor child; order Defendant to provide medical, dental, orthodontic, prescription, and optical coverage for the minor child and pay amounts not covered by insurance; order that the Birth Certificate of the minor child be changed to reflect that **Plaintiff Defendant** is the father of said minor child; award care, custody and control, both legal and physical, of the minor child; **(if applicable)** order Defendant to pay for the cost of blood testing; **(if applicable)** award Plaintiff reasonable attorney fees and for the costs of this action; and for such other and for such further relief as the Court deems necessary and just.

Attorney Name and Bar Number
ATTORNEY FOR PLAINTIFFS
Attorney Address
Attorney Telephone Number
Attorney email address

STATE OF MISSOURI)
) ss.
COUNTY OF _____)

Plaintiff _____, of lawful age, being duly sworn on his/her oath, states that he/she is the Plaintiff named above; and that the facts stated therein are true according to the best knowledge and belief of Plaintiff.

Plaintiff signature

Subscribed and sworn to before me this _____ day of _____,
20____.

_____, Notary Public
State of Missouri
County of _____
My term expires: _____