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IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

In re the matter of:	)	
SEJAD DZANANOVIC,	)	
	)	Cause Number: 17SL-DR00517
Petitioner,	)	
	)	Division Number: 65
and	)	
	)	
SELMA DZANANOVIC n/k/a,	)	ISSUE SUMMONS:
SELMA TOPALOVIC,	)	SPECIAL PROCESS SERVER
	)	
Respondent.	)	

RESPONDENT'S MOTION TO MODIFY
JUDGMENT OF PATERNITY

COMES NOW Respondent, Selma Topalovic, and for her Motion to Modify the Judgment of Dissolution of Marriage entered in this cause on December 26, 2017, states:

1. A Judgment of Dissolution of Marriage was entered on or about December 26, 2017 (hereinafter sometimes referred to as the "Judgment").

2. Pursuant to the terms of the Judgment, the parties have joint legal and physical custody of the minor child born of Petitioner and Respondent; namely, Armina Dzananovic, now age 9 (hereinafter sometimes referred to as "the minor child") with a specific schedule set forth for the parties' respective parenting time with the minor child in the event that they did not agree otherwise.

3. Since entry of the Judgment, there have been changes in the circumstances of Petitioner, Sejad Dzananovic, (hereinafter sometimes referred to herein as "Petitioner" or "Father") so substantial and continuing that a modification in the schedule and custody of Father's parenting time with the minor child is necessary to serve the best interests of the minor child, said changes including but not limited to the following:

(A) The parties are unable to effectively communicate. Father repeatedly threatens Mother and argues about times to pick up and return the minor child.

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(B) It would facilitate effective co-parenting if the parents were to use a co-parenting app to communicate with each other limited to the minor child except in extreme circumstances.

(C) Father is mentally abusive to minor child including but not limited to telling her "that her mom is not really her mom". Father lacks in discipline thus causing behavioral issues when minor child is with Mother.

(D) Father's behavior is and will continue to be harmful to the mental health of the minor child and therefore minor child is in need of counseling and Mother has requested this and Father will not agree.

4. It is in the best interests of the minor child that a change in custody time of the parties reflect more of a consist 50/50 plan and that the minor child attend counseling.

5. The minor child has lived in the state of Missouri for the 6 months immediately preceding the filing of this Motion to Modify; Respondent has not participated in any other litigation concerning the custody of the minor child in this state or any other state, and does not know of any other person not a party to this proceeding who has physical custody of said minor child or who claim to have custody or visitation rights with respect to said minor child.

6. Since entry of the Judgment, there have been substantial and continuing changes in the circumstances of Father so as to make the terms regarding child support unreasonable, said changes including but not limited to the following:

(A) Upon information and belief Father has new employment with a substantial increase in income.

7. It is in the best interest of the minor child that child support be modified pursuant to the changes mentioned above.

8. Mother lacks sufficient income and assets with which to pay her attorney's fees and is therefore in need of Father to contribute to her attorney's fees and costs incurred in prosecuting this action.

WHEREFORE, Respondent, Selma Topalovic, respectfully requests this Court to modify the Judgment entered in this cause on December 26, 2017; order custody time of the parties reflect more of a consistent 50/50 plan; order counseling for the minor child; order the parties communicate via a Parenting App; order Petitioner pay child support to Respondent pursuant to Form 14; order Petitioner contribute to her attorney's fees and costs incurred in prosecuting this action; and for such other and further relief as this Court deems just and proper in the premises.

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STATE OF MISSOURI)
) SS.
COUNTY OF ST. LOUIS)

The undersigned, being duly sworn upon her oath, deposes and states that the facts and matters stated in the foregoing are true and correct according to her best information, knowledge and belief.

Selma Topalovic

Selma Topalovic f/n/a Dzananovic,
Respondent

Subscribed and sworn to before me this 27th day of July 2023.

Pamela Lynn Ohlendorf

Notary Public

My Commission Expires:

10/17/26

PAMELA LYNN OHLENDORF
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Oct. 17, 2026
Commission # 14030084

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Respectfully Submitted,

THE CARSON LAW FIRM

/s/ Leigh Joy Carson

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Attorney for Respondent Selma Topalovic

Certificate of Service

A copy of the foregoing was sent via e-file system to all parties of record on this 28th day of July 2023.

/s/ Leigh Joy Carson

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