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

FILED
SEP 26 2023
JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

KRISTA N. O'BRIEN,	)	
	)	
Petitioner,	)	
	)	Cause No. 17SL-DR02824-01
vs.	)	
	)	Division 36
DANIEL T. O'BRIEN,	)	
	)	
Respondent.	)	

PETITIONER'S MOTION FOR ALLOCATION OF GUARDIAN AD LITEM FEES

COMES NOW Petitioner, KRISTA N. O'BRIEN, by and through counsel, and for her Motion for Allocation of Guardian ad Litem Fees, states to the court as follows:

1. That Petitioner ("Mother") filed her Motion to Modify in this case on January 13, 2021. Mother subsequently amended her motion on September 24, 2021, and filed her second amended motion on March 20, 2023.

2. Respondent ("Father") filed his counter Motion to Modify on March 11, 2021.

3. At the request of Father, on May 23, 2023, the court appointed a guardian ad litem to this case, appointing the prior guardian ad litem, David Betz, to act.

4. On May 31, 2023, Father filed his motion to disqualify David Betz as guardian ad litem.

5. The parties have agreed that Laura Stobie be appointed to act as guardian ad litem.

6. The parties do not agree to an equal allocation of guardian ad litem fees because the appointment of a new guardian ad litem will necessarily cause more fees that would not have otherwise been incurred had the prior guardian ad litem continued to serve in this matter.

7. The newly appointed guardian ad litem will need to review and research matters that the prior guardian ad litem already had knowledge of and, therefore, the cost of the guardian ad litem will be increased.

8. For the reasons stated herein, the initial award of guardian ad litem fees shall be borne, in whole or substantial part, by Father.

WHEREFORE, Petitioner prays for an order of this court that Respondent be pay the initial guardian ad litem fees for the newly appointed guardian ad litem, Laura Stobie, and for such other and further orders this court deems just and proper in the premises.

Denied without prejudice
SO ordered
9-26-23

LAW OFFICE OF NATHAN S. COHEN

BY: /s/ Nathan S. Cohen

Nathan S. Cohen, #36072
Attorney for Petitioner
210 South Bemiston Avenue
St. Louis, MO 63105
(314) 727-6088 - Telephone
(314) 727-6081 - Facsimile
nathan@nathanscohen.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was electronically filed on June 15, 2023 with the Clerk of the Circuit Court by using the Missouri e-Filing System, and that participants in the case who are registered users will be served by the system pursuant to Rule 103.08.

/s/ Nathan S. Cohen