

Division Middlesex

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court Department

Docket No. _____

MOTION FOR

John Doe
Plaintiff/Petitioner

V.

Jane Doe
Defendant/Respondent

TEMPORARY SHARED LEGAL AND PHYSICAL

CUSTODY

Now comes John Doe, Plaintiff Defendant Petitioner Respondent,
(name of moving party)

in this action who requests:

that the Court order that the parties have shared legal and physical custody of the parties' minor children.

His reasons are that the Defendant has taken the parties' 2 minor children to stay with her mother; that she has told him not to contact her or the children; that her actions have disrupted the children's happiness, wellbeing, and companionship with the Plaintiff.

All is more fully described in his accompanying affidavit.

Date February 1, 2016

John Doe

(Signature of attorney or plaintiff, if pro se)

NOTICE OF HEARING

This motion will be heard at the Probate and Family Court

In _____
(city)

on _____
(month/day/year)

at _____
(time of hearing)

John Doe
(Print name)

200 City Street
(Street address)

Anycity
(City/Town)

MA
(State)

00000
(Zip)

Tel. No. **(123) 456-7890**

B.B.O. # _____

The within motion is hereby **ALLOWED** **DENIED**

Date _____

Justice of the Probate and Family Court

Division Middlesex

Docket No. _____

MOTION FOR

SHARED LEGAL AND PHYSICAL CUSTODY

Dated: February 1, 2016

CERTIFICATE OF SERVICE

I hereby certify that I have delivered a copy of this motion to:

(name of party or attorney of record)

(Address)

(City/Town)

(State)

(Zip)

By delivery in hand _____ at _____ AM PM
(date of delivery) (time)

mailing (postage paid on) _____
(date of mailing)

(signature)

Sample