

DOCKET NO. H12-CP09-00000-A : SUPERIOR COURT
: JUVENILE MATTERS
IN RE: JANE D. : AT HARTFORD
: MARCH 22, 2011

MOTION FOR EXTENSION OF TIME TO FILE APPEAL

Pursuant to Practice Book § 66-1 (c), the Respondent *Mother/Father, Jane Doe*, seeks to extend the time limit provided for filing an appeal for an additional twenty days until *April 25, 2011*. The time limit provided for filing an appeal currently expires on *April 4, 2011*. Trial counsel for the respondent mother and counsel for the father consent to the granting of this motion. Undersigned counsel has left a voicemail message for counsel for the minor child and counsel for the Department of Children and Families requesting consent to the granting of this motion and has not yet heard back.

I. Brief History

On March 11, 2011, the trial court terminated the parental rights as to *Jane Doe* against his *mother/father, Doe*. Notice of this decision was transmitted to counsel on *March 14, 2011*. *Jane Doe* has not yet filed an appeal from that judgment. The time limit provided for filing an appeal from that judgment expires on *April 4, 2011*.

II. Specific Facts

Undersigned counsel was referred this case and filed our appearance on *March 22, 2011*. Undersigned counsel received a copy of the trial court file on *March 22, 2011*. Undersigned counsel has only just begun review of the trial court file in order to begin

determining whether there are grounds for an appeal from the trial court's decision. Undersigned counsel has also filed a motion for expedited transcripts, but has not yet received or had the chance to review the transcripts. The undersigned represents that the additional twenty days until *April 25, 2011* will be sufficient time to review the transcripts, the court file and the memorandum of decision in order to determine whether there are grounds for filing an appeal and, if those grounds exist, to file an appeal. Additionally, the undersigned represents that the requested twenty days will allow the *respondent mother* an opportunity to protect her legal rights should the undersigned not find adequate grounds for appeal and should the respondent mother wish to retain successor counsel.

III. Legal Basis

Practice Book § 66-1 provides authority for granting this motion for good cause. The facts set forth above demonstrate good cause.

RESPONDENT, JANE D.

By _____

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CERTIFICATION

I hereby certify that the foregoing complies with the requirements of P.B. §§ 66-1, 66-2 and 66-3 and that the font used is Arial 12.

I further certify that the foregoing motion was filed on *March 22, 2011* and copied to all counsel of record as noted below. In addition, I further certify that a copy of the foregoing was mailed, postage prepaid on *March 22, 2011* to *Jane D.*

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