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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF LINN

In the Matter of:

KYLA MAZHARY-CLARK,  
Petitioner,

and

JAMIE CLARK,  
Respondent,

and

KENNETH CLARK,  
Respondent.

Case No. 19DR03123

MOTION FOR ENTRY OF  
JUDGMENT OF WITHOUT A  
HEARING

1.

Petitioner moves the Court for a judgment granting psychological custody of Sage Clark and Sadie Clark to Petitioner without a hearing. This motion is based on the Declaration of Petitioner filed herein.

Dated this 9<sup>th</sup> day of August, 2019.

  
Kyla Mazhary-Clark  
Petitioner

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No. 19DR03123

DECLARATION OF  
PETITIONER

STATE OF OREGON        )  
County of Linn         )ss

I, Kyla Mazhary-Clark, being first duly sworn, do depose and say:

I am the Petitioner in the above-entitled matter. I make this declaration in support of entry of my general judgment of psychological parent custody.

Respondent Jamie Clark is the biological mother of Sage and Sadie Clark. Respondent Kenneth Clark is the biological father of Sage and Sadie Clark.

For more than six months prior to the commencement of these proceedings I was a resident and inhabitant of the State of Oregon.

There are no domestic relations suits or petitions for support pending in any other court of this state or in any other state.

1 Respondent Kenneth Clark does not parenting time with the minor children and should  
2 continue to have no parenting time.

3 Respondent Jamie Clark has mental health issues which are not currently being treated  
4 and which limit her ability to safely care for Sage and Sadie. Prior to me obtaining  
5 guardianship of Sage and Sadie, the children were previously put in foster care in Illinois  
6 based on Jamie Clark's mental health issues, abuse and neglect of the children and inability to  
7 protect the children from abuse and neglect from her romantic partners. Additionally, there is  
8 an open DHS investigations regarding Jamie's ability to safely parent Sage and Sadie. Jamie  
9 Clark has failed to remedy factors which placed the children in danger.

10 I do not believe the Jamie Clark should have any parenting time with Sage and Sadie until  
11 such time as she undergoes an independent psychiatric or psychological evaluation to determine  
12 if she is suicidal, homicidal or has any diagnosable mental health, psychological, or psychiatric  
13 issues that could impair her ability to parent or have supervised parenting time with Sage and  
14 Sadie. If it is determined that Jamie Clark is not a threat to the minor children, Jamie Clark should  
15 have parenting time shall be exercised as the parties mutually agree, pursuant the professional  
16 directions of the children's therapist and as allowed by the Department of Human Services.  
17 Parenting time should be phased in using a therapeutic approach approved by the children's  
18 therapist.

19 Dated this 9th day of August, 2019.

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*Kyla Mazhary-Clark, Petitioner*