**IN THE CIRCUIT COURT OF \_\_\_\_\_\_\_\_\_\_\_ COUNTY ALABAMA**

**CHILD SUPPORT DIVISION**

**Plaintiff \***

**\***

**v. \* Case No.**

**\***

**Defendant. \***

**\***

**DEFENDANT’S MOTION TO SET ASIDE OR MODIFY CHILD SUPPORT ORDER**

COMES NOW, ­­­­­­­­­­­­defendant \_\_\_\_\_\_\_\_\_\_\_, a Project H.O.P.E. participant, by and through undersigned counsel, and files this motion to set aside or modify child support order dated \_\_\_\_\_\_\_\_\_ and as grounds states as follows:

1. Project H.O.P.E. (Helping Offenders Pursue Excellence) is an initiative led by the United States Attorney Kenyen Brown and the United States Attorney’s Office for the Southern District of Alabama. The mission of Project H.O.P.E. is to address the needs of re-entering ex-offenders in order to make their transitions back into main stream society a success. It is a restorative initiative with the aim of giving ex-offenders a chance to become good citizens while simultaneously affording the greater community with the opportunity to enjoy safer neighborhoods and a lesser tax burden.
2. Defendant was incarcerated at \_\_\_\_\_\_\_\_\_\_ from \_\_\_\_\_\_\_\_\_ to \_\_\_\_\_\_\_\_\_\_\_\_.
3. During that time, child support arrears accumulated in the amount of $\_\_\_\_\_\_\_.
4. Since release from \_\_\_\_\_\_\_\_\_\_\_, Defendant has participated in the Project H.O.P.E. Re-Entry Initiative program and *describe any reentry efforts made/programs participated in etc.*
5. Defendant has/has not been able to secure work at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, earning approximately $\_\_\_\_ per month.
6. *If not able to secure work, describe job search efforts*.
7. Defendant is unable to fulfill the support obligation of $\_\_\_\_\_\_\_\_\_ at this time.

WHEREFORE, the permises considered, Defendant requests this Honorable Court to grant this motion to set aside or modify the child support order.

Respectfully submitted:

/s/\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attorney for Defendant

Project H.O.P.E. volunteer

Attorney’s Firm Name

Address

**CERTIFICATE OF SERVICE**

I, \_\_\_\_\_\_\_, hereby certify that I have on this the \_\_\_\_\_\_\_\_of \_\_\_\_\_\_\_\_\_\_\_ 2016, served a true and correct copy of the above and foregoing document upon counsel for plaintiff via the Alafile online filing system and US Mail.

/s/ \_\_\_\_\_\_\_\_\_\_\_\_\_\_

**IN THE CIRCUIT COURT OF \_\_\_\_\_\_\_\_\_\_\_ COUNTY ALABAMA**

**CHILD SUPPORT DIVISION**

**Plaintiff \***

**\***

**v. \* Case No.**

**\***

**Defendant. \***

**\***

**DEFENDANT’S MOTION TO HOLD WRIT IN ABEYANCE**

COMES NOW, ­­­­­­­­­­­­defendant \_\_\_\_\_\_\_\_\_\_\_, a Project H.O.P.E. participant, by and through undersigned counsel, and files this motion to hold the writ in abeyance and as grounds states as follows:

1. Project H.O.P.E. (Helping Offenders Pursue Excellence) is an initiative led by the United States Attorney Kenyen Brown and the United States Attorney’s Office for the Southern District of Alabama. The mission of Project H.O.P.E. is to address the needs of re-entering ex-offenders in order to make their transitions back into main stream society a success. It is a restorative initiative with the aim of giving ex-offenders a chance to become good citizens while simultaneously affording the greater community with the opportunity to enjoy safer neighborhoods and a lesser tax burden.
2. Defendant was incarcerated at \_\_\_\_\_\_\_\_\_\_ from \_\_\_\_\_\_\_\_\_ to \_\_\_\_\_\_\_\_\_\_\_\_.
3. Defendant owes child support in accordance with a child support order dated \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. During the time of incarceration, child support arrears accumulated in the amount of $\_\_\_\_\_\_\_.
4. Since release from \_\_\_\_\_\_\_\_\_\_\_, Defendant has participated in the Project H.O.P.E. Re-Entry Initiative program and *describe any reentry efforts made/programs participated in etc.*
5. Defendant has/has not been able to secure work at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, earning approximately $\_\_\_\_ per month.
6. *If not able to secure work, describe job search efforts*.
7. Defendant is unable to fulfill the support obligation of $\_\_\_\_\_\_\_\_\_ at this time.

WHEREFORE, the premises considered, Defendant requests this Honorable Court to grant this motion to hold the writ in abeyance.

Respectfully Submitted:

/s/ \_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attorney for Defendant

Project H.O.P.E. volunteer

**CERTIFICATE OF SERVICE**

I, \_\_\_\_\_\_\_, hereby certify that I have on this the \_\_\_\_\_\_\_\_of \_\_\_\_\_\_\_\_\_\_\_ 2016, served a true and correct copy of the above and foregoing document upon counsel for plaintiff via the Alafile online filing system and US Mail.

/s/ \_\_\_\_\_\_\_\_\_\_\_\_\_\_