

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF _____

_____ JUDICIAL DISTRICT

_____,

)

File #

)

Plaintiffs,

)

vs.

)

Complaint

)

)

_____,

)

Defendant(s),

)

)

)

COMES NOW Plaintiffs, _____, who, by and through their attorney of record,

_____, and for their cause of action against Defendant, avers and alleges as follows:

1. Plaintiffs, _____, currently reside at

_____, North Dakota. They have resided in the State of North Dakota

for in excess of six months prior to commencement of this action.

2. Defendant, _____, currently resides at _____,

North Dakota.

3. (Defendant) is not currently in the Armed Services of the United States of America or its

allies.

4. _____ (Grandparents) are the parents of _____ (child-possibly

defendant).

5. _____ (parents) were married or about _____ (date), in _____,

North Dakota. _____ (describe status of relationship – married, divorced,

deceased, etc.).

6. _____ (parents) have _____ minor children together, namely _____
(identity children by initials and year or birth).

7. On or about _____(date) , _____(mom or dad) _____
(identify reason why grandparent parenting time is necessary – i.e., On or about January 1, 2010, John Doe,
biological father, passed away).

8. Prior to _____ (event which prohibited grandparent visitation),
_____ (grandparents) were actively involved in minor children's lives. (Give examples
of relationship between grandparents and grandchildren.

9. Since _____ (event), _____ (mom, dad, or both parents) have not
allowed _____ (grandparents) visitation with their grandchildren.

10. _____ (grandparents) are fit and proper grandparents to have reasonable
visitation with their grandchildren, _____ (identify children by initials).

11. It is in the best interests of _____ (children) to have reasonable visitation
with _____ (grandparents).

12. _____ (grandparent's) reasonable visitation will not interfere with
_____ (mom, dad, or both parent's) relationship with _____ (minor
children).

13. This action has been filed in good faith and for the purposes set forth herein.

14. No separate proceeding for grandparent visitation has been commenced or is pending in
the State of North Dakota or elsewhere.

WHEREFORE, Plaintiffs pray for the following relief:

- a. Awarding Plaintiffs reasonable visitation with their grandchildren, namely _____
(identify children by initials); and
- b. For such other, further and additional relief as this Court may deem just and proper.

Dated this ____ day of _____, 20____.

Attorney Name
Address
Telephone number
ND License #
Attorney for _____