



Attorney Questionnaire

1. How many Divorce cases have you handled as lead attorney where child custody was a matter in dispute?
2. How many Divorce cases with a child custody dispute have you handled where the case went all the way through a trial and resulted in a judge entering a decision as opposed to the result being a stipulated agreement of the parties?
3. [NOTE: We would suggest asking how many cases where they have won for a father wherein the Judge rendered a decision in favor of the father [i.e. awarding some true joint physical custody,] but the odds are they have never even handled a child custody trial at all]
4. How many divorce cases with a child custody dispute component have you handled wherein you presented evidence at trial about your client as relates to the various factors included for determining the best interests of a child?
5. How many divorce cases have you handled where during the pendency of the case, you received a specific trial date?
6. Have you ever requested a trial date in a child custody case?
7. How many divorce cases with a child custody dispute component have you handled where you examined your own mental health witness during a trial. [Note: Not preliminary hearing]
8. How many times in such cases have you taken an interlocutory appeal?
9. How many times in such cases have you prepared a case for your client in such a way as to perfect, as best as reasonably possible, a record for appeal that allows for making a good case that the judge's decision was arbitrary and/or capricious in that the decision could not be justified based on any objective standard but rather relied only on vague and unmeasurable standards that have no real place in a child custody determination?
10. How many times in such cases have you taken an appeal of a judge's decision that went against the interests of your client as re child custody?
11. Do you challenge any preliminary order as re temporary custody to assure that the plaintiff is not able to have their cake and eat it too by getting the court to collude in establishing what the plaintiff will later assert amounts to an "established custodial environment?"
12. [Note: I don't recommend that you actually give this to 99% of practicing attorneys because they will immediately back out. Still, it will be helpful in preparing you for being in charge of your own case.]

A Father's Life Saver