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8 SUPERIOR COURT OF [Name of State]
9 COUNTY OF [Name of County]

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11 [Style of Case]) Case Number:
12 [Plaintiff/Petitioner]: [Ptn: Name])
13 [vs/and]) PARENT'S RIGHT TO
14 [Defendant/Respondent]: [Res: Name]) KNOW THE RESIDENCE
OF THE CHILDREN
_____)

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16 1.0 ABSENT AN AFFIRMATIVE SHOWING OF DETRIMENT BY THE
17 CUSTODIAL PARENT, THE NON CUSTODIAL PARENT HAS A RIGHT
18 TO THE KNOWLEDGE AS TO WHERE THE CHILDREN ARE RESIDING.

19 1.1 A parent is entitled to know where the children of the
20 relationship reside. In re Marriage of Oldfield (1979)
21 94 Cal.App.3d 259, 262 [156 Cal.Rptr. 224, 225]

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1 1.1.1 A parent cannot be deprived of this knowledge absent
2 an affirmative showing on the part of the other
3 parent that it would be unwise for the other parent
4 to be in possession of the children's residence. In
5 re Marriage of Oldfield (1979) 94 Cal.App.3d 259,
6 262 [156 Cal.Rptr. 224, 225].

7 2.0 AN ATTORNEY WHO IS REPRESENTING A PARTY TO AN ACTION
8 MUST DISCLOSE THE ADDRESS AND RESIDENCE OF THAT PARTY.

9 2.1 The power of a court to direct the disclosure of the
10 client's address has long been recognized. Falkenhainer
11 v Falkenhainer (1950) 97 N.Y.S.2d 467, 468. Accord:
12 Anonymous v Anonymous (1969) 298 N.Y.S.2d 345

13 2.2 When a client has appeared in an action in which the
14 address is sought and the client has sought the use of
15 the courts and the information is necessary not only to
16 protect the rights of a party adverse to the client, but
17 also the interests of an innocent third party - the
18 minor child - the address of the client is not
19 privileged information. Dike v Dike (Wash. 1968) 448
20 P.2d 490, 497-498. Accord: Matter of Jacqueline F.
21 (1979) 47 N.Y.2d 215 [391 N.E.2d 967, 970-971]

22 3.0 SUBMISSION

23 3.1 Respectfully submitted on [Date Submitted].

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