

DISTRICT COURT, COUNTY OF EL PASO,
STATE OF COLORADO

Court Address: 20 East Vermijo, Colorado
Springs, CO 80903 Phone: 719-448-7577

Petitioner:

DEBORAH A. THORUP

v.

Respondent:

DALE K. THORUP

Paul A. Faraci, #26032
COOPER & CLOUGH, P.C.
1512 Larimer Street, Suite 600
Denver, Colorado 80202-1621

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Case No: 01 DR 2408

Div.: V

**NONPARTY CYNTHIA DUCKWORTH'S VERIFIED MOTION FOR A
RESTRAINING ORDER AGAINST RESPONDENT**

Nonparty, Cynthia Duckworth, MA, LPC, through counsel Cooper & Clough, P.C., requests that the Court issue a restraining order against Respondent, as set forth below, and in support thereof, Ms. Duckworth states as follows:

1. Ms. Duckworth is a counselor licensed to practice in the State of Colorado. As the Court held in the recent hearing on October 10, 2002, Respondent wanted Ms. Duckworth to evaluate his parenting and supervise his visits with his daughter, [REDACTED] pursuant this Court's December 21, 2001 Order. Ms. Duckworth was to report to the Court her findings so the Court could evaluate parenting issues.

2. Respondent has been diagnosed with a personality disorder, an adjustment disorder, a mood disorder, and alcohol dependence. Respondent has made threats to harm Petitioner which, upon information and belief, are tape recorded and in the possession of Petitioner's counsel. Upon information and belief, Petitioner had to obtain a restraining order as a result of Respondent's threatening behavior.

3. Pursuant to her role as a Court ordered evaluator and supervisor of parenting time for Respondent, Ms. Duckworth prepared a draft report in May of 2002. The draft described concerns about Respondent's behavior with his daughter.

4. After learning of the report, Respondent called Ms. Duckworth's office. Ms. Duckworth was not available, but Respondent spoke with the intake therapist. The intake therapist reported to Ms. Duckworth that Respondent was extremely angry at Ms. Duckworth about the report. She told Ms. Duckworth that it was her impression from the intensity of the tone and content of the conversation that she felt Respondent might be violent toward Ms. Duckworth. She recommended Ms. Duckworth take precautions for her safety.

5. Ms. Duckworth is now being asked to testify as to her opinions in this matter. Based upon Respondent's history of threatening behavior toward Ms. Duckworth and Petitioner, Ms. Duckworth requests that the Court enter a Restraining Order that Respondent have no contact, in person or otherwise (excepting contact by his attorney), with Ms. Duckworth, that he remain 500 feet away from Ms. Duckworth, and that he refrain from attacking, beating, molesting, verbally harassing, following, or threatening Ms. Duckworth.

WHEREFORE, Ms. Duckworth requests that the Court enter a restraining order against Respondent as set forth above, and for such further relief as the Court deems proper.

COOPER & CLOUGH, P.C.

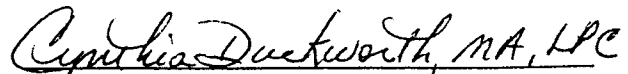


Paul A. Faraci, #26032
1512 Larimer Street, Suite 600
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(303) 607-0077

Attorneys for Nonparty Cynthia Duckworth

VERIFICATION

I, Cynthia Duckworth, swear or affirm under penalty of perjury that the information contained in this Verified Motion for Restraining Order is true and correct.

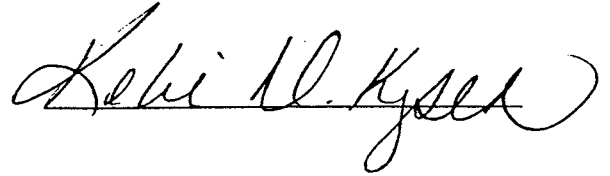

Cynthia Duckworth, MA, LPC

CERTIFICATE OF SERVICE

The undersigned certifies that on this ^{4~~th~~}15 day of October, 2002, a true and correct copy of the foregoing NONPARTY CYNTHIA DUCKWORTH'S VERIFIED MOTION FOR A RESTRAINING ORDER was mailed in the U.S. mail, postage prepaid, and addressed as follows:

Steven M. Werner, Esq.
WERNER & HOUGH
301 S. Weber St.
Colorado Springs, CO 80903

Roger B. Larsen, Esq.
524 S. Cascade Avenue, Suite #8
Colorado Springs, CO 80903

A handwritten signature in black ink, appearing to read "Lehi W. Kysel", written in a cursive style.