

District Court, El Paso County, State of Colorado 20 E. Vermijo, Colorado Springs, CO 80903	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> <hr/> Case No: 01 DR 2408 Div. 6 Ctrm. 401
<hr/> In re: the Marriage of Petitioner: DEBORAH A. THORUP Respondent: DALE K. THORUP	
<hr/> Attorneys for the Petitioner: Steven M. Werner #24190 Law Offices of Steven M. Werner, P.C. 301 S. Weber St. Colorado Springs, CO 80903 Phone Number: (719) 473-4885 FAX Number: (719) 473-5993 E-mail: smw1014@hotmail.com	
MOTION TO REQUIRE SECURITY FOR CHILD SUPPORT AND ATTORNEY'S FEES	


THE PETITIONER, by and through her undersigned attorney, hereby moves for an Order directing the Respondent to provide security to enforce this court's child support orders. Under the provisions of C.R.S. 14-10-118 (2), "The court has the power to require security to be given to insure enforcement of its orders, in addition to other methods of enforcing court orders prescribed by statute or by the Colorado rules of civil procedure on or after July 6, 1973."

The Respondent has not been complying with this Court's orders by paying his obligated child support of \$500.00 per month. At present he is in arrears in an amount in excess of \$8,000.00. Moreover, the Respondent has begun acting as his own attorney. In so doing, he has been filing numerous redundant, frivolous and groundless motions that have and will continue to unnecessarily cost the Petitioner attorney's fees. Petitioner believes that security should be provided to cover those fees.

Fairness warrants that Respondent be ordered to post a bond in an amount deemed appropriate by the Court to cover these expected obligations and costs.

WHEREFORE, the Petitioner requests that this motion be granted.

Respectfully submitted December 12, 2002.


Steven M. Werner
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent by mail, postage prepaid, on December 12, 2002 to the following:

Dale Thorup
3053 Seven Arrows Court
Canyon City, CO 81212

