

**THE FAMILY COURT OF
EAST BATON ROUGE PARISH
STATE OF LOUISIANA**

Division: _____

DeLarge Parker, III, and Gladys Parker

Petitioner(s)

and

Ebony Nicole Wilson

Respondent

PETITION FOR LEGAL CUSTODY

COMES NOW the undersigned Petitioner(s) and alleges as follows:

1. This is an action for custody pursuant to Chapter(s) 2, 3, Article(s) 302, 303(2), 309(1), 310(2), and complies with the Louisiana Childrens Code.
2. Petitioner(s) DeLarge Parker, III and Gladys Parker, are sui juris (18 years of age or older and not legally incapacitated) and resident(s) of East Baton Rouge, Parish, State of Louisiana.
3. The residence(s) and post office address(es) of the Petitioner(s) are: DeLarge Parker, III., 5959 Prescott, Rd., Baton Rouge, Louisiana 70805, and Gladys Parker, 2827 Duke, Street, Baton Rouge, Louisiana.
4. Markin Alex Wilson, a child, is a minor, fifteen (15) months old, who was born on November 2, 2007 in Baton Rouge, State of Louisiana, and has resided in East Baton Rouge, Louisiana since birth.
5. The current address of the minor child is: 2827 Duke, Street, Baton Rouge, Louisiana.
6. The Petitioner(s) relationship to the minor child is: DeLarge Parker, III (godfather/uncle) Gladys Parker (grandmother).
7. The name(s) and current address(es) of the person(s) with whom the child has lived with is: Ebony Nicole Wilson (mother), Mr & Mr's DeLarge Parker (grandparents) of 2827 Duke, Street, Baton Rouge, Louisiana, and Mr & Mr's DeLarge Parker, III (godparents) of 5959 Prescott, Rd., Baton Rouge, Louisiana 70805.
8. The name(s) and address(es) of the minor child's parents are:

Natural or Legal father: unknown

Natural or legal mother: Ebony Nicole Wilson, 2827 Duke Street, Baton Rouge, Louisiana, 70805.

9. That Petitioner(s) are proper person(s) to be awarded legal care, custody, and control over the minor child in that: the child will be in a safe and secure environment and free from harm, abuse and neglect, and will allow strict supervised visits of the child's mother.

10. Petitioner(s) alleges that it is in the child's best interest that this petition is granted in that: The child's mother has a long-term mental illness which have resulted in repeated confinement within mental institutions since the child's birth, and has also been confined for a period of three (3) months in the East Baton Rouge Parish Prison for the crime of violence (a felony that resulted in serious bodily injury) against another family member (her mother) (Gladys Parker). During these episodes of confinement of the mother, the child has resided with DeLarge Parker, III (godfather/uncle) and Gladys Parker (grandmother).

11. The Petitioner(s) are requesting legal custody of the minor child for the following period of time: Until this matter is fully adjudicated.

12. The reason(s) why Petitioner(s) are requesting that the court grant legal custody for the above described time period are as follows: Due to the mother's inability to maintain mental stability which result in break-downs and repeated confinements within Mental Institutions.

13. There are no temporary or permanent orders for child support.

14. There are no temporary or permanent orders of protection entered on behalf of or against either parent, the petitioner(s), or the child, with the exception of a OCS case instituted by Ms. Tamarin Brue (160 S. Ardenwood, Baton Rouge, Louisiana., 225-925-6984).

WHEREFORE, Petitioner(s) prays for the entry of a judgment awarding the petitioner(s) legal

care, custody, and control of the minor child named herein and granting the petitioner(s) authority to consent to all necessary and reasonable medical and dental care for the child, includingg, but not limited to, medical screening, immunizations and PPT-Tuberculin testing, HIV testing, non emergency and emergency surgery and psychiatric care; to secure copies of the child's records, held by third parties, that are necessary to the care of the child, including but not limited medical, dental, psychiatric records, birth certificates, and birth records, to consent to babysitter or daycare enrollment; and do all other things necessary for the care of the child, and such other relief as the Court deems appropriate and just.

Respectfully submitted:

Petitioner(s)

Address(es): 5959 Prescott, Rd
Baton Rouge, LA 70805
and
2827 Duke Street
Baton Rouge, LA 70805

STATE OF LOUISIANA
PARISH OF EAST BATON ROUGE

The foregoing Petition was sworn to and subscribed before me this _____ day
of _____ 200_____.

NOTARY PUBLIC