

PALMER ★ MANUEL

A Texas Law Firm

March 6, 2018

**Personal & Confidential**

Jeffrey Damon Younger

**Via Email to** [REDACTED]

Re: *Cause No. DF-15-09887*; IMOM Anne Georgulas and Jeffrey Damon Younger and  
In the Interest of James Damon Younger and Jude Daniel Younger, Children.

Dear Mr. Younger:

As you know, I represent Anne Georgulas. You have two children together, James (who now goes by Luna) and Jude. On October 18, 2016, the Court conducted a trial in this matter and after hearing all the evidence and testimony of both parties, entered an Order in Suit Affecting the Parent-Child Relationship (the "2016 Order"). In the 2016 Order, on page 4, it was ORDERED that Anne Georgulas would have:

3. the **exclusive** right, after notifying the Father, to consent to psychiatric and psychological treatment of the children; (emphasis added; see attached).

Anne has taken Luna to Rebekka Ouer for counseling. Before such appointments, Anne notified you about her choice and she has regularly given you notice of the appointments and updates. I understand you have been involved with that counseling and have meet with Ms. Ouer directly. We encourage your involvement with the counseling by Ms. Ouer.

I understand you have expressed a desire to switch counselors or have a second counselor. First, we do not believe that would be in the best interest of the child. Further, Anne has the exclusive right to make the counseling decision. You were not given the right to consent to psychiatric or psychological care. See pages 4-5 of the 2016 Order, attached. Therefore, you would be in violation of the 2016 Order if you tried to schedule a counseling appointment or take Luna to a counselor other than Ms. Ouer. It is not because of your "custody schedule" that you cannot take Luna to a new counselor of your choice. It is because of the *Conservatorship* ORDERED which is the rights and duties the Court ordered in this matter.

With that said, Anne very much would like you to be involved with the counseling of Luna with Rebekka Ouer, the current counselor. Further, she is willing to discuss a potential "other" counselor with you so long as she and the current counselor agree it will not be detrimental to the child. Therefore, please send Anne the name and contact information for any counselor you are proposing and she will let you know if she consents to counseling with such counselor. However,

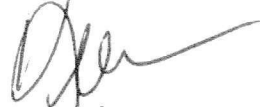
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please do not proceed with taking the child to another counselor without the prior written consent and agreement of Anne.

If you take Luna/James to a counselor other than Ms. Ouer, you must notify us and we will proceed with a motion to enjoin such action and for enforcement for violation of the 2016 Order, including contempt.

Very truly yours,



Kim Meaders  
Direct: 214-242-6439  
[kmeaders@pamlaw.com](mailto:kmeaders@pamlaw.com)

KMM:lcf

Cc: Anne Georgulas (via email)

shall have the following rights and duty:

1. the right, subject to the agreement of the other parent conservator, to represent the children in legal action and to make other decisions of substantial legal significance concerning the children;
2. the right, subject to the agreement of the other parent conservator, to consent to marriage and to enlistment in the armed forces of the United States;
3. except as provided by section 264.0111 of the Texas Family Code, the right, subject to the agreement of the other parent conservator, to the services and earnings of the children;
4. except when a guardian of the children's estates or a guardian or attorney ad litem has been appointed for the children, the right, subject to the agreement of the other parent conservator, to act as an agent of the children in relation to the children's estates if the children's action is required by a state, the United States, or a foreign government; and
5. the duty, subject to the agreement of the other parent conservator, to manage the estates of the children to the extent the estates have been created by community property or the joint property of the parents.

Residency Restriction

The Court finds that, in accordance with section 153.001 of the Texas Family Code, it is the public policy of Texas to assure that children will have frequent and continuing contact with parents who have shown the ability to act in the best interest of the child, to provide a safe, stable, and nonviolent environment for the child, and to encourage parents to share in the rights and duties of raising their child after the parents have separated or dissolved their marriage. IT IS ORDERED that the primary residence of the children shall be in Dallas, Denton, Tarrant and Collin counties, and the parties shall not remove the children from Dallas, Denton, Tarrant and Collin counties for the purpose of changing the primary residence of the children until modified by further order of the court of continuing jurisdiction or by written agreement signed by the parties and filed with the court.

IT IS FURTHER ORDERED that Anne Georgulas shall have the exclusive right to designate the child's primary residence within Dallas, Denton, Tarrant and Collin counties, Texas.

IT IS FURTHER ORDERED that this geographic restriction on the residence of the children shall be lifted if, at the time Anne Georgulas wishes to remove the child from Dallas, Denton, Tarrant and Collin counties, Texas for the purpose of changing the primary residence of the child, Jeffrey Damon Younger does not reside in Dallas, Denton, Tarrant and Collin counties, Texas.

Passport/Travel

Anne Georgulas has the exclusive right to apply for passports for the children. If Anne Georgulas applies for a passport for the children, James Damon Younger or Jude Daniel

3. the right to consent for the children to medical and dental care not involving an invasive procedure; and

4. the right to direct the moral and religious training of the children.

IT IS ORDERED that Anne Georgulas, as a parent joint managing conservator, shall have the following rights and duty:

1. the exclusive right to designate the primary residence of the children within Dallas, Denton, Tarrant and Collin counties, as more specifically set forth below in *Residency Restriction*;

2. the exclusive right, after notifying the Father, to consent to medical, dental, and surgical treatment involving invasive procedures;

3. the exclusive right, after notifying the Father, to consent to psychiatric and psychological treatment of the children;

4. the exclusive right to receive and give receipt for periodic payments for the support of the children and to hold or disburse these funds for the benefit of the children;

5. the right, subject to the agreement of the other parent conservator, to represent the children in legal action and to make other decisions of substantial legal significance concerning the children;

6. the right, subject to the agreement of the other parent conservator, to consent to marriage and to enlistment in the armed forces of the United States;

7. the exclusive right, after notifying the Father, to make decisions concerning the children's education;

8. except as provided by section 264.0111 of the Texas Family Code, the right, subject to the agreement of the other parent conservator, to the services and earnings of the children;

9. except when a guardian of the children's estates or a guardian or attorney ad litem has been appointed for the children, the right, subject to the agreement of the other parent conservator, to act as an agent of the children in relation to the children's estates if the children's action is required by a state, the United States, or a foreign government; and

10. the duty, subject to the agreement of the other parent conservator, to manage the estates of the children to the extent the estates have been created by community property or the joint property of the parent.

IT IS ORDERED that Jeffrey Damon Younger, as a parent joint managing conservator,