

NORTH CAROLINA  
\_\_\_\_\_ COUNTY

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION  
\_\_\_\_-CVD-\_\_\_\_\_

\_\_\_\_\_,  
Plaintiff,  
v.  
\_\_\_\_\_,  
Defendant.

**MOTION FOR  
PSYCHOLOGICAL  
EVALUATION**

COMES NOW the plaintiff, by and through counsel, and moves the Court pursuant to Rule 35 of the North Carolina Rules of Civil Procedure and Rule 706 of the North Carolina Rules of Evidence for the appointment of a qualified child psychologist to conduct a psychological evaluation of the parties and the children for purposes of assisting the Court in determining the issue of custody and visitation. In support of said motion, the plaintiff respectfully shows unto the Court the following:

1. The plaintiff was is a citizen and resident of \_\_\_\_\_ County, North Carolina; the defendant is a citizen and resident of \_\_\_\_\_ County, North Carolina.
2. The plaintiff and the defendant were husband and wife, having been married to each other on \_\_\_\_\_, and subsequently divorced on \_\_\_\_\_.
3. Two minor children were born of the marriage, to wit: \_\_\_\_\_, born \_\_\_\_\_; and \_\_\_\_\_, born \_\_\_\_\_.
4. This is an action instituted by the plaintiff against the defendant for, inter alia, primary custody of the minor children. The defendant filed no answer or counterclaim and at the time of the absolute divorce, the plaintiff was awarded sole custody of the minor children on \_\_\_\_\_. The defendant filed a motion for a modification of custody on \_\_\_\_\_.
5. The plaintiff has the following concerns about the parenting ability of the defendant and her mental and emotional state, and believes that a psychological evaluation of both parties and the children would aid the Court in making a determination regarding custody and visitation:
  - a.
  - b.
  - c.

6. Good cause exists for the appointment of a qualified psychologist to do a psychological evaluation of the parties and the minor children to assist the Court in making a determination as to the custodial/visitation arrangement in the children's best interest.

WHEREFORE, the plaintiff prays the Court as follows:

1. That the Court appoint a qualified child psychologist to conduct a psychological evaluation of the parties and the minor children to assist the Court in making a determination regarding custody and visitation of the minor children in their best interests, with the cost of such evaluation to be borne equally by the parties; and
2. That the Court order such other and further relief as may seem just and proper.

This the \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

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Attorney for Plaintiff