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| DISTRICT COURT, BOULDER COUNTY, COLORADO 1777 6 th Street, Boulder, CO 80302 | COURT USE ONLY |
| <i>In re the Marriage of:</i> Petitioner: RICHARD JOHN DORSEY and Respondent: LAUREN ALICIA DORSEY | |
| <i>ATTORNEYS FOR PETITIONER</i> David Littman, #10579 Abigail L. Asadi, #58164 Littman Family Law & Mediation Services 1772 Emerson Street Denver, CO 80218 Phone: (303) 832-4200 Fax: (303) 832-9322 Email: david@littmanfamilylaw.com abigail@littmanfamilylaw.com | Case Number: 2025 DR 704 Division: 14 |
| RESPONDENT’S RESPONSE IN OPPOSITION TO PETITIONER’S REQUEST FOR ATTORNEY FEES AND TO RESTRICT PARENTING TIME TO COLORADO | |

On July 22nd, 2025 Respondent, Lauren Alicia Dorsey, pro se, received via USPS mail the Petitioner’s *Response to Respondent’s Motion to Relocate Minor Children* and respectfully submits this Response in opposition to Petitioner’s requests to:

- Require Respondent to pay Petitioner’s attorney fees, and
- Restrict Respondent’s parenting time with the minor children exclusively to Colorado.

Respondent also supports her pending Motion to Relocate the children to Hawai‘i and asks this Court to proceed in the children’s best interests.

RESPONSE

I. Introduction and background

1. Respondent is the biological mother of Lucia and Rae and has been the children's primary caregiver since birth. Caretaking duties to include providing food and housing, clothing, play activities, hygiene, nap & bed time routines, learning exercises and reading books, along with attending all doctor and therapy appointments while Respondent lived alongside Petitioner.
2. Respondent is currently receiving unemployment benefits due to her own health-related circumstances and is actively seeking employment as a Registered Nurse in Hawai'i, consistent with her experience and licensure.
3. Petitioner's employment history has been inconsistent and short-term, undermining his ability to provide long-term financial security comparable to Respondent's nursing background. Petitioner contributed to very few household and child upbringing expenses from 2020-2024.

II. Petitioner's employment history and concerns

4. Petitioner worked at Chuze Fitness from mid-2023 through early 2024. He frequently expressed unhappiness being away from the children. When Respondent sought to separate, Petitioner became emotionally unstable and communicated suicidal ideation. Since Respondent had been paying more in childcare costs than Petitioner's income, she requested that Petitioner leave his job and put his efforts towards creating a lawful entrepreneurial business for himself, while his mother was moved in from Florida to assist with childcare in the home.

5. In early 2023, Petitioner worked at Dodge Ram in Boulder, but left after only a few months due to poor commissions and job dissatisfaction.
6. Later in 2023, Petitioner worked informally trimming marijuana for cash alongside a friend, Austin Stevens, without legal employment structure.
7. From November 2021 to May 2022, Petitioner grew over 100 marijuana plants indoors for Austin Stevens in a covert residential operation.
8. The parties relocated to Ward, Colorado in May 2020 so Petitioner could cultivate marijuana outdoors.
9. Between late 2024 and February 2025, Petitioner cultivated psilocybin mushrooms in the Thornton home for income, while the children lived in the household.
10. This pattern of informal, unregulated, and illicit work demonstrates instability and contrasts sharply with Respondent's plans for a lawful and stable environment in Hawai'i. Petitioner has yet to share with the Respondent any of his financial information (i.e. bank statements for 3 years) as outlined in Mandatory Financial Disclosures.

III. Factual background

11. Lucia has a documented eczema diagnosis from Every Child Pediatrics in Thornton, Colorado. Both Lucia and Rae currently exhibit visible skin irritation on their extremities—dryness and inflammation—in Colorado's dry climate.
12. Respondent has secured stable housing in Hawai'i and established a supportive and health-promoting environment. Her medical condition has improved in the tropical climate. Petitioner moved himself and children to a property in Ward, Colorado which is hoarded and is deemed an unsafe environment for the children. The children and father sleep in 1

bedroom. There are hazardous materials inside the house and outside on the property which the children could be injured upon.

13. Despite Respondent's repeated offers to facilitate visitation in Hawai'i during school breaks, holidays, or summer, Petitioner has refused to allow the children to visit, depriving them of exposure to their potential home and support system.

IV. Email communication history

14. Between March and July 2025, Respondent consistently initiated email communications and parenting proposals:
15. March 5th, 2025 ("Relocation"): Respondent informed Petitioner of her planned visit to Hawai'i, noted the children's interest, offered to coordinate travel, and proposed a joint parenting arrangement. No response from Petitioner.
16. March 8th, 2025 ("Children"): Respondent asked for Petitioner's new address, raised safety and financial concerns, and offered a low-cost housing option in Hawai'i for the children (and Petitioner, if needed). No response.
17. April 3rd–9th, 2025: Respondent visited Colorado to visit with the children and complete a short sale on the house; she communicated with Petitioner that her health had improved in Hawai'i and it felt correct to move there.
18. May 19th–20th, 2025: Petitioner sought clarification regarding planned travel; Respondent provided a formal out-of-state parenting plan aligned with Colorado guidelines, emphasized continued parent-child relationships, and suggested mediation. Petitioner did not respond.
19. June 4th, 2025: Petitioner responded that he opposed travel for the children, preferring all visitation to happen in Colorado. He acknowledged his financial instability and expressed that he looks forward to travel to Hawai'i in the future.

20. June 4th–13th, 2025: Respondent requested a routine FaceTime schedule with the children; Petitioner blamed spontaneous scheduling but failed to agree to or propose a schedule.
21. June 11th, 2025: Respondent requested regular calls (e.g. Monday, Wednesday, Friday), and offered to provide a phone for the children since Petitioner’s mother Lucille Gwin did not want to continue using her phone for calls—no reply from the Petitioner.
22. June 8th–12th, 2025: Respondent requested use of a shared vehicle in Colorado during her upcoming visit and access to the children’s new proposed nanny; when Petitioner declined availability of the nanny to meet the Respondent, Respondent proposed a virtual meeting—no response from Petitioner.
23. June 13th, 2025: Adams County Court denied Petitioner’s abduction-prevention motion and encouraged a cooperative parenting plan including visitation in Hawai‘i. On June 16th, Respondent found an AirTag in the shared vehicle, without her consent, the Petitioner used this AirTag to track her location in the car with the children.
24. June 25th, 2025: Father submitted a draft parenting plan; Mother responded with objections noting it failed to reflect prior proposals or Court suggestions.

V. Communication with children via FaceTime

25. Between March 2025 and July 2025, Respondent has conversed over 45 successful FaceTime calls with the children, with another 31 documented FaceTime attempts that went ignored, with no follow-up or coordination efforts by Petitioner.
26. Petitioner has neither accepted offers to provide devices for communication nor agreed to a consistent FaceTime schedule, despite Respondent’s repeated proposals.
27. This pattern has interfered with the children’s emotional connection to Mother and is contrary to their best interests and the statutory requirement for ongoing parent-child contact.

VI. Dispute: attorney fees should not be awarded

28. C.R.S. § 14-10-119 permits attorney fee awards only where there is financial disparity, bad faith, or unnecessary litigation. None are present here.

29. Respondent is unemployed due to health concerns, and relying on temporary benefits while seeking reemployment. Petitioner has also admitted to financial instability.

30. Respondent has acted in good faith, cooperatively, and initiated parenting planning discussions rather than obstructive litigation. An award of attorney fees would be unjust.

VII. Dispute: restricting mother's parenting time to Colorado is contrary to the children's best interests

32. C.R.S. § 14-10-124 mandates that parenting time be allocated according to the children's best interests.

33. Lucia's medical diagnosis of eczema is aggravated by Colorado's dry climate; Hawai'i's tropical climate offers natural therapeutic benefit.

34. Respondent has established stable housing, a supportive environment, and improved her own health upon relocation.

35. Despite Respondent's reasonable efforts, Petitioner has obstructed visitation, hindered communication, and failed to cooperate in parenting planning.

36. Respondent's proposed long-distance plan includes extended holidays, summer visits, virtual contact, and cost-sharing—fully in line with Colorado guidelines and supportive of both parent-child bonds.

VIII. Conclusion and request for relief

37. The totality of evidence supports that relocation with Mother to Hawai'i is in the children's best interests, particularly given medical, emotional, and practical considerations, as well as

Mother's sustained efforts to co-parent. Parent-communication has been unjustly hindered by Father's conduct.

38. Wherefore, Respondent respectfully requests that the Court DENY Petitioner's request for attorney fees and request to restrict parenting time with Mother to Colorado only.
39. Mother requests the Court to grant to the *Motion to relocate minor children* to Hawai'i as their primary residence and any such other relief as the Court deems just and proper.

DATED this 28th day of July, 2025.

A handwritten signature in black ink that reads "Lauren Alicia Dorsey". The signature is written in a cursive style and is positioned above a horizontal line.

Lauren Alicia Dorsey

Respondent, Pro Se

15-2660 Pāhoa Village Rd. Ste 203-238

Pahoa, HI 96778

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically filed and served to the following on this 28th day of July 2025.

Richard John Dorsey

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(Via E-Mail and CCE)

/s/Lauren Dorsey

Lauren Dorsey, Respondent
