

IN THE
INDIANA SUPREME COURT

CASE No.: _____

██████████

Appellant-Petitioner,

v.

██████████

Appellee-Respondent.

Court of Appeals Case No.

████████████████████

Appeal from the ██████████

██████████

The Honorable ██████████

██████████, Judge

Trial Court Cause

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REQUEST FOR ORAL ARGUMENT

Comes now Petitioners, by counsel, Bryan Ciyou and Darlene Seymour, pursuant to Ind. Rule of Appellate Procedure 52(A), and file their Request for an Oral Argument, in support thereof, would show the Court, as follows:

1. That the Petitioners understand that an oral argument is within this Court's discretion under Appellate Rule 52(A) and granted if the Court believes helpful to deciding the case.

2. That this request for an Oral Argument is being timely filed.

3. That the issue presented on Transfer is of great public policy, importance, and interest in that it involves equal protection and privileges and immunities of married versus unmarried persons as it relates to constitutionality of statutory law providing right for a court to order contribution to higher education only for unmarried parents under the law, treating married parents completely differently with no statute or case law right to so order.

4. That in addition, this college-expense statute also completely frustrates the constitutional fundamental parental right of unmarried parent's to make educational choices for his or her children.

5. That this is an area of law in the state of Indiana that needs reconsideration to keep up with the overall constitutional right and concept of equality and equal treatment under the law for everyone, a beacon and benchmark of America's legal system that is the envy of the world.

6. That counsels for Petitioners have spent considerable time researching these significant constitutional issues and feel oral argument would assist this Court in making a decision on these important constitutional rights, including the fundament right to raise one's children with a minimum of state interference, one of the most precision rights enshrined in states and federal constitutions.

WHEREFORE, Petitioners, by counsel, pray for an oral argument before this Court.

Respectfully submitted,

/s/ Bryan Ciyou
Bryan L. Ciyou

/s/ Darlene Seymour
Darlene R. Seymour
Attorneys for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties this [REDACTED], via this Court's electronic filing system:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

/s/ Darlene Seymour
Darlene R. Seymour