|  |  |
| --- | --- |
| COURT OF APPEALS, STATE OF COLORADOCOURT USE ONLY2 East 14th Ave., Denver, CO 80203Dependency & NeglectName of Lower Court(s):Trial Court Judge(s):Case Number(s):**THE PEOPLE OF THE STATE OF COLORADO,** **In the Interest of:****XXX****Children,****XXX****Respondent-Appellent,****XXX****Respondent-Appellee**Attorney or Party Without Attorney:XxxxxxPhone: (xxx) xxx-xxxx E-mail: xxx Fax: (xxx) xxx-xxxx Atty. Reg #: xxxxx | Case Number:       |
| **OPENING BRIEF OF APPELLANT XX** |

# CERTIFICATE OF COMPLIANCE

 I hereby certify that this brief complies with all requirements of C.A.R. 3.4, C.A.R. 28 and C.A.R. 32, including all formatting requirements set forth in these rules. Specifically, the undersigned certifies that:

 The Opening Brief complies with C.A.R. 28(g) and 3.4(f) because it contains <7500 words, under separate heading (1) a concise statement of the applicable standard of appellate review with citation to authority; and (2) a citation to the precise location in the record where the issue was raised and ruled on, (3) a statement of all Indian Child Welfare Act findings, (4) a summary of arguments, (5), a concise statement of the case, and (5) Appellant’s full legal argument.

 The Opening Brief complies with C.A.R. 32 because it is prepared using Roman style font14 point size including footnotes.

 I acknowledge that my brief may be stricken if it fails to comply with any of the requirements of C.A.R. 3.4, 28 and 32.

Dated this XX day of XXX, 20XX,

 s/ xxx, #xxxxx

 Attorney for Appellant XXX

# TABLE OF CONTENTS

[CERTIFICATE OF COMPLIANCE ii](#_Toc474145959)

[TABLE OF CONTENTS iv](#_Toc474145960)

[TABLE OF AUTHORITIES vi](#_Toc474145961)

[STATEMENT OF COMPLIANCE WITH ICWA 1](#_Toc474145962)

[ISSUES PRESENTED FOR REVIEW 1](#_Toc474145963)

[STATEMENT OF THE CASE 1](#_Toc474145964)

[I. Nature of the Case 1](#_Toc474145965)

[II. Statement of Facts and Course of the Proceeding 1](#_Toc474145966)

[SUMMARY OF ARGUMENT 2](#_Toc474145967)

[ARGUMENT 2](#_Toc474145968)

[I. Issue I 2](#_Toc474145969)

[A. Standard of Review 3](#_Toc474145970)

[B. Preservation for Appeal 3](#_Toc474145971)

[C. Issue subheading I 3](#_Toc474145972)

[D. Issue Subheading 2 4](#_Toc474145973)

[II. Issue 2 4](#_Toc474145974)

[A. Standard of Review 4](#_Toc474145975)

[B. Preservation for Appeal 4](#_Toc474145976)

[C. Issue subheading I 5](#_Toc474145977)

[D. Issue subheading 2 5](#_Toc474145978)

[C. Issue subheading 2 5](#_Toc474145979)

[CONCLUSION 6](#_Toc474145980)

[CERTIFICATE OF WORD COUNT 6](#_Toc474145981)

[CERTIFICATE OF SERVICE 7](#_Toc474145982)

*[right click on the table of contents, and tell it to update field to update the text and page numbers]*

# TABLE OF AUTHORITIES

 Page(s)

**[Insert table of authorities from References tab above]**

**The following link describes how to mark citations to create a table of authorities:**

[**https://support.office.com/en-us/article/Create-a-table-of-authorities-ddd126ae-52bc-4299-9558-06dd0e4fe8c0**](https://support.office.com/en-us/article/Create-a-table-of-authorities-ddd126ae-52bc-4299-9558-06dd0e4fe8c0)

# STATEMENT OF COMPLIANCE WITH ICWA

 The trial court made inquiries about the Indian Child Welfare Act (hereinafter “ICWA”) on xxxx. The trial court ruled that ICWA did xxx.

# ISSUES PRESENTED FOR REVIEW

 A. Issue one

 B. Issue two

# STATEMENT OF THE CASE

## I. Nature of the Case

This is a dependency and neglect case that resulted in termination of parental rights...

## II. Statement of Facts and Course of the Proceeding

Statement of facts statement of facts statement of facts statement of facts Statement of facts statement of facts statement of facts statement of facts Statement of facts statement of facts statement of facts statement of facts Statement of facts statement of facts statement of facts statement of facts

# SUMMARY OF ARGUMENT

Summary summary summary summary summary summary summary summary summary summary summary xxx Summary summary summary summary summary summary summary summary summary summary summary

# ARGUMENT

## I. Issue I

 Argument argument argument argument argument argument argument Argument argument argument argument argument argument argument Argument argument argument argument argument argument argument

### A. Standard of Review

 Standard of review Standard of review Standard of review Standard of review Standard of review Standard of review

### B. Preservation for Appeal

 Preservation preservation preservation preservation preservation preservation Preservation preservation preservation preservation preservation preservation

### C. Issue subheading I

 Detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail

### D. Issue Subheading 2

Detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail

## II. Issue 2

 Argument argument argument argument argument argument argument Argument argument argument argument argument argument argument Argument argument argument argument argument argument argument

### A. Standard of Review

 Standard of review Standard of review Standard of review Standard of review Standard of review Standard of review.

### B. Preservation for Appeal

Preservation preservation preservation preservation preservation preservation Preservation preservation preservation preservation preservation preservation.

### C. Issue subheading I

 Detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail

### D. Issue subheading 2

Detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail

### C. Issue subheading 2

Detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail detail

# CONCLUSION

 Conclusion conclusion conclusion conclusion.

# CERTIFICATE OF WORD COUNT

 By my signature below, I certified that the number of words in the body of the final form of this brief as counted by Microsoft Office, is <7500.

Respectfully submitted this xx day of xxxx, 20XX.

 s/xxxx

 xxxx, #xxxxx

 Attorney for XXX

# CERTIFICATE OF SERVICE

 I hereby certify that on XXX, a true and correct copy of the foregoing was served by the Colorado E-filing system or by placing a true and correct copy in the United States Mail, postage prepaid and addressed to:

 s/xxxx