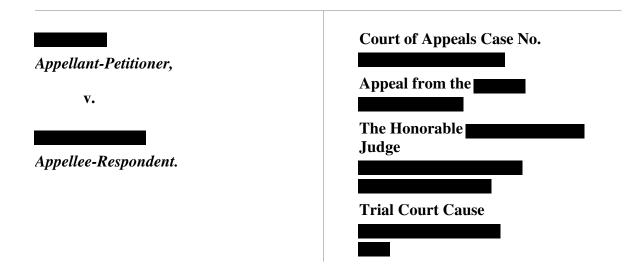
## IN THE INDIANA SUPREME COURT

CASE No.:\_\_\_\_\_

Annual from the
Appeal from the
The Honorable , Judge
Trial Court Cause
Court of Appeals Case No.
Appeal from the
The Honorable Judge
Trial Court Cause



## 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** 

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## **CERTIFICATE OF SERVICE**

a true and accur		ng was served upon the ronic filing system:
	I	

/s/ Darlene Seymour Darlene R. Seymour