

**COURT OF APPEALS OF GEORGIA  
DOCUMENT RETURN NOTICE FOR APPLICATIONS**

**March 10, 2015**

**To:** Timothy J. Crouch, Esq., 527 Broad Street • Suite C, Rome, Georgia 30161

**Docket Number: Style: In the Interest of: K.A., A.A., Children (Mother)**

Your document(s) is (are) being returned for the following reason(s).

1.  Your Application was not accompanied by the statutory filing fee, \$300.00 civil; \$80.00 criminal, or a sufficient pauper's affidavit, Appointment of Counsel or affidavit of counsel. OCGA§5-6-4 and Rule 5 Please be advised that your pauper's affidavit should be notarized by a notary public.
2.  Portions of the record included were not tabbed and indexed. Rules 30 (e) and 31 (c).
3.  A stamped "filed" copy of the trial court's order to be appealed was not attached to your Application. Rules 30 (b) and 31 (e)
4.  A stamped "filed" copy of the Certificate of Immediate Review was not attached to your Interlocutory Application. Rule 30(b)
5.  Your document(s) was (were) not signed by counsel (No signatures with expressed permission are permitted). Rule 1 (a)
6.  There were an insufficient number of copies of your document. Rule 6
7.  No Certificate of Service accompanied your document(s). Rule 6 You should provide a copy of your filing to the District Attorney and include his/her name and address on your Certificate of Service.
8.  Your Certificate of Service did not include the complete name and /or mailing address of each opposing counsel and pro se party. Rule 1(a) and 6
9.  Your document exceeds page limits. Rules 24(f) , 30(e) and 31(c)
10.  Your request for court action must be submitted in motion form. Rule 41 (a)
11.  No extension of time for filing an interlocutory application will be granted . Rule 30 (g) . No extension of time will be granted for filing a discretionary application unless the motion for extension is filed on or before the due date of the discretionary application.
12.  The type font was smaller than 10 characters per inch; type was not double-spaced or/and type was on both sides of the paper. Rules 1(c), 24(b), 37(a) and 41(b).
13.  Your motions were submitted in an improper form (joint, compound, or alternative motions in one document). Rule 41 (b)
14.  **Electronic filing is mandatory in this Court. The following Rule 46 became effective January 1, 2015.**

**XXII. ELECTRONIC FILING OF DOCUMENTS**

**Rule 46. Electronic Filing of Documents.**

**Counsel is required to use the Court's electronic filing system and to follow the policies and procedures governing electronic filing as set forth in the Court's electronic filing instructions. The Clerk of Court may grant a request for exemption from mandatory electronic filing for good cause shown. An adverse decision by the Clerk of Court may be appealed by motion to the Court via a paper filing.**

**Rule passed October 21, 2014 - effective January 1, 2015**

**Timothy J. Crouch**

Attorney At Law  
527 Broad Street, Suite C  
Rome, Ga. 30161

(706) 235-0878

FAX: (706) 232-9247

March 6, 2015

Clerk, Georgia Court of Appeals  
47 Trinity Avenue SW, Suite 501  
Atlanta GA 30334  
Attention: Applications Clerk

**Certified Mail, Return Receipt Requested-** 7013 2630 0000 2505 5674

Re: In re: K.A., A.A.; Application for Discretionary Appeal from Juvenile Court of Floyd County.

Dear Clerk/Deputy Clerk:

Enclosed please find the original and a copy of an Application for Discretionary Appeal from a termination decision by the Juvenile Court of Floyd County. I am also enclosing a copy of the Order of Appointment appointing me to represent the applicant mother on appeal due to based upon a finding of the trial Court that she is indigent dispensing with the need to include a filing fee and our copy of the application. Upon filing/docketing, I would request that you return our copy of the application in the enclosed self-addressed stamped envelope. Your assistance and prompt attention to this matter is appreciated. If you need anything further, please feel free to contact me.

Please contact me if you have any questions.

Sincerely,

  
Timothy J. Crouch

RECEIVED IN OFFICE  
2015 MAR 10 AM 10:57  
CLERK/COURT ADMINISTRATOR  
COURT OF APPEALS OF GA

IN THE JUVENILE COURT OF FLOYD COUNTY  
STATE OF GEORGIA

IN RE: AUTRY CHILDREN  
Minor children

)  
) CASE NO.  
) 14-JV-894 A-B

**ORDER OF APPOINTMENT**

The Respondent mother, SISSY HYDE, is currently incarcerated and is indigent. She has indicated to her trial counsel that she wishes to appeal the Order to Terminate Parental Rights in the above noted case. TIMOTHY J. CROUCH, a member in good standing of the State Bar of Georgia is hereby appointed to represent Ms. Hyde in her appeal.

This 24<sup>th</sup> day of February, 2015   
C. Gregory Price,  
Judge, Floyd County Juvenile Court

FILED  
2015 FEB 24 AM 9 08  
FLOYD CO. JUVENILE COURT  
CLERK / DEPUTY CLERK  


IN THE COURT OF APPEALS OF THE STATE OF GEORGIA

IN THE INTERST OF K.A., A.A. ) CASE NO.  
Minor children under the age of 18 )

APPLICATION FOR DISCRETIONARY APPELLAGE REVIEW

RECEIVED IN OFFICE  
2015 MAR 10 AM 10:58  
CLERK COURT APPELLATE  
COURT OF APPEALS OF GA

COMES NOW, Sissy Annette Itson Hyde, mother of the above noted m children, by and through counsel, and applies to this Court for leave, a discretionary appeal from an order of the Floyd County Juvenile Court terminating her parental rights and shows the Court as follows:

(1). This appeal would be taken from an order in the Floyd County Juvenile Court, case no. 14-JV-894A-B, entered on December 1, 2014 terminating her parental rights to the above noted children and an order entered on February 6, 2015 denying her Motion for New Trial.

(2). The enumerations of errors in the appeal would be the insufficiency of the evidence to support the trial court's findings and its order of termination. In particular, Applicant would argue that the evidence presented did not support a finding that the termination of parental rights is in the children's best interests given the lack of evidence that termination of parental rights would accomplish the goal of permanency and stability for the children since no evidence that they were in, or were soon to be in, a stable, long term permanent placement or that it would not be detrimental to the children given their bond or sense of attachment with their mother, the factors listed in O.C.G.A. sec. 15-11-910(b). The only evidence of concerning the children's well being and needs were psychological evaluations done on the children approximately 8 months earlier, attached hereto, which focused on the children's behavioral issues and psychological testing results. The reports did not specially state any bond or lack of bond with the mother which would be affected by termination, their reaction to return to their mother, any bond with their current caregivers, who had had the children approximately a month at the time of the report, which would be affected by continued efforts at