

PETITIONER'S PRE-TRIAL STATEMENT

**In Re the Marriage of: RICHARD DORSEY, Petitioner, and
LAUREN DORSEY, Respondent**

**Case No. 2025DR704 | Division 14 | Boulder County District
Court**

**Hearing: July 31, 2026 — Motion Regarding School
Selection**

I. POSITION

Petitioner Richard Dorsey respectfully requests that the Court deny Respondent's motion and confirm Rae Dorsey's enrollment at Nederland Elementary School preschool for the 2026–27 school year.

Rae is four years old and has never attended school. Her older sister, Lucia, will attend Nederland Elementary School for first grade in the 2026–27 school year. Petitioner enrolled Rae at Nederland so both sisters could attend the same school — the same drop-off, the same building, the same school community — for Rae's first year of school.

The applicable statute, C.R.S. § 14-10-124, requires the Court to consider the child's relationships with siblings as an express best-interests factor. For a four-year-old starting school for the first time, the sibling relationship is the most meaningful form of stability either parent can provide. That relationship is available at Nederland and not at Mapleton.

Petitioner acknowledges that Mapleton Early Childhood Center holds a higher Colorado Shines rating. However, BVSD's own Child Find coordinator, Gisela Sanchez, confirmed in writing that both schools provide the same Child Find services for Rae. The rating difference does not change what Rae specifically will receive. The statutory best-interests factors — particularly sibling continuity — favor Nederland.

Additionally, BVSD has recommended a full evaluation for Rae following her June 4 screening. That evaluation has not yet been completed. Changing Rae's school placement while an evaluation is pending introduces unnecessary disruption at a time when stability is most important.

Every logistics concern Respondent raises traces back to her own decision about where to live. Petitioner has remained in Ward throughout this proceeding. The children have remained in Ward. The transportation difficulty Respondent describes is a consequence of her

residential choices — not a reason to reorganize both children's school placements.

II. WITNESSES

1. **Richard Dorsey** — Petitioner, pro se. Will testify regarding enrollment process, sibling relationship, Lucia's Nederland enrollment, transportation, and the children's daily life in Ward.
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III. EXHIBITS

#	Description
A	Gisela Sanchez email chain (June 1–2, 2026) — BVSD Child Find confirms same services at both schools
B	Colorado UPK match confirmation (May 21, 2026) — Rae matched to Nederland preschool
C	Megan Pielke email (June 4, 2026) — BVSD recommends full evaluation for Rae
D	Lucia Dorsey enrollment confirmation — Nederland Elementary, 1st grade, 2026–27
E	Petitioner's Response to Motion (filed June 21, 2026)
F	Petitioner's Proposed Order (filed June 21, 2026)
G	BVSD Preschool Placement Confirmation (June 11, 2026) — Rae placed at Nederland PM session
H	Liliana Luces email (June 8, 2026) — BVSD confirms Respondent's prior SchoolMint registration caused enrollment blockage
I	Liliana Luces email chain (May 21 – June 11, 2026) — Full enrollment timeline
J	Gisela Sanchez email chain (May 15, 2026) — Respondent agreed to Ward as BVSD primary household address; Respondent's Longmont address was SVVSD territory
K	Residential proximity — Ward (15 min to Nederland ES) vs. Boulder (45 min); Mapleton is located near Respondent's Boulder residence

IV. ESTIMATED TIME

Petitioner estimates 35 minutes for his presentation, including opening statement, testimony, and response to Respondent's arguments.

Respectfully submitted,

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Date: ____