

UNITED STATES DISTRICT COURT
DISTRICT OF _____

CASE NO. _____

Petitioner,

v.

Respondent.

_____ /

ORDER DIRECTING RETURN OF MINOR CHILDREN
TO COUNTRY OF HABITUAL RESIDENCE

The Court orders, pursuant to the 1980 Convention on the Civil Aspects of International Child Abduction (the “Hague Convention”) and the International Child Abduction Remedies Act, 22 U.S.C. §§ 9001 et. seq., that [names and dates of birth of minor children] (the “minor children”), be returned in the company of [name of party], to the sovereign nation of [name of country]; and

1. That by agreement of the parties, [names and dates of birth of children], (the “minor children”), shall be delivered to the Petitioner forthwith and shall be returned in the company of the [name of party] to the sovereign nation of [name of country], departing the United States of America forthwith, and that the Petitioner shall report the arrival of the minor children in [name of country] to the appropriate Central Authority. The children shall be delivered to the Petitioner for purposes of their return travel to [name of country] no later than 24 hours prior to their scheduled flight departure time. Upon finalization of travel arrangements for the minor children, Petitioner shall promptly inform Respondent of the airline, flight number, flight departure date and time.

2. That by agreement of the parties, the Clerk of the Court shall release the minor children’s passports to the Petitioner forthwith and that the Petitioner’s counsel shall release the Petitioner’s passport to the Petitioner forthwith.

3. That by agreement of the parties, the parties shall be bound by the following undertakings, all subject to the further orders of a court of competent jurisdiction, to wit:

A. From the date the minor children are returned to [name of country] until further order of a court of competent jurisdiction resolving the issue of custody of the minor children, by agreement of the parties, the Mother and Father shall have shared 50/50 physical custody of their minor children in [name of country]. The parties agree that the physical custody schedule shall be on an alternating weekly basis, with the child exchange to take place on Sunday evenings at 6:00 p.m., unless the day or time for exchange is otherwise agreed between the parties. By agreement of the parties, the minor children shall be with the Mother or Father for the first week upon arrival in [name of country].

B. By agreement of the parties, neither the parties nor any other person acting at the direction of the parties shall remove the children from the [location] area without the consent of both the Mother and the Father.

C. By agreement of the parties, the minor children shall attend [name and location of school]. The Mother and Father shall timely execute any and all necessary consent or other forms for the minor children's enrollment. The Mother and Father agree to inform the school that they share parental responsibility for the minor children pursuant to this Order.

D. All parties agree that they shall not initiate or pursue any criminal charges against any other party in any country or local jurisdiction relating to any alleged threats of physical harm and/or the removal of the minor children from [name of country] and retention of the minor children in the United States until the date of this Order.

E. By agreement of the parties, the Petitioner shall escort the minor children back to [name of country] and shall pay the airfare expenses for the minor children. The parties agree to execute any and all required consent forms for the minor children's travel to [name of country].

This Order is not a determination of the merits of any custody issues within the meaning of Article 19 of the Hague Convention.

The Order of this Court is made under the authority of 22 U.S.C. § 9003(a), conferring jurisdiction upon this Court.

**THEREFORE, TO ANY PEACE OFFICER IN THE STATE OF _____
OR TO ANY FEDERAL OFFICER:**

You are hereby commanded to assist ___[name of party]___ to remove the minor child from the United States of America, and to allow ___[name of party]___ to accompany the minor child to ___[name of country]___, giving ___[name of party]___ the right without interference to have the minor child in his / her lawful temporary custody for the purposes described herein.

This Order is effective the date below written, and shall continue in force and effect until modified or cancelled by a court of competent jurisdiction in [name of country].

IT IS SO ORDERED:

Date

United States District Judge
United States District Court for the
District of _____