

T Laura, Lui, Esq.  
FILLMORE SPENCER LLC  
525 WEST 5300 SOUTH  
SUITE 200  
MURRAY UT 84125

Third District Juvenile Court  
FOR SALT LAKE COUNTY, STATE OF UTAH

STATE OF UTAH, in the interest of		Order Allowing Alternative Service by Publication
Olivia Mariano, Zoe	09-19-2017	Case No. 1218961
Guadalupe		
A person under the age of 18 years		Judge Elizabeth Lindsley

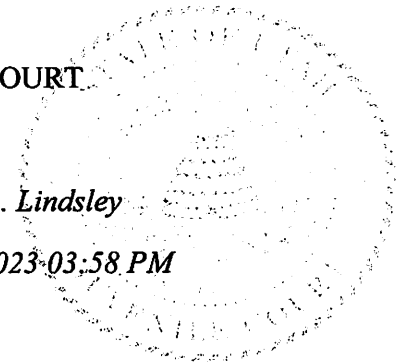
Based on the Motion for Publication and the facts alleged in the Petition for Custody that the whereabouts of the biological father are unknown but that based upon information and belief the biological father is still residing in Mexico, the Court finds good cause and hereby;

ORDERS that service can be executed against the biological father by publication in GlobalLegalNotices.com, which is a newspaper of general circulation in Mexico near the biological father. This publication shall be once every week for four weeks consecutively.

SIGNED BY THE COURT

*/s/ Judge Elizabeth A. Lindsley*

*and filed on 12-13-2023-03:58 PM*



T. LAURA LUI (#10472)  
FILLMORE SPENCER LLC  
525 W 5300 S, Suite 200  
Murray, Utah 84123  
Telephone: (801) 590-9263  
*Attorneys for Petitioner*

IN THE THIRD JUDICIAL JUVENILE COURT – SALT LAKE

IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

-----oo0oo-----

STATE OF UTAH, in the interest of	:	<b>SUMMONS</b>
	:	
OLIVIA MARIANO, Zoe Guadalupe	:	
	:	Case No.: 1218961
DOB: 09-19-2017	:	
	:	Judge: Lindsley
	:	
A Child under the age of 21 years	:	

-----oo0oo-----

The State of Utah to Leovigildo Oliva Renteria:

You are summoned and required to answer the attached complaint/petition. Within 30 days after service of this summons, you must file your written answer with the clerk of the court at the court the Third Judicial Juvenile Court located at 450 South State Street, Salt Lake City, UT 84111. Within that same time, you must mail or deliver a copy of your answer to the party or the party's attorney at the address shown above. If you fail to do so, judgment by default may be taken against you for the relief demanded in the amended petition, which is has been filed with the clerk of the court.

DATED this 13<sup>th</sup> day of December, 2023

FILLMORE SPENCER LLC

/s/ Laura Lui  
T. Laura Lui  
*Attorneys for Petitioner*

T. LAURA LUI (#10472)  
FILLMORE SPENCER LLC  
525 W 5300 S, Suite 200  
Murray, Utah 84123  
Tel. (801) 590-9263  
Email: llui@fslaw.com  
*Attorneys for Petitioner*

IN THE THIRD JUDICIAL JUVENILE COURT  
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

-----oo0oo-----

STATE OF UTAH, in the interest of	:	PETITION FOR CUSTODY AND
	:	GUARDIANSHIP
	:	
ZOE GUADALUPE OLIVA MARIANO,	:	
(09/19/2017)	:	Case No.: 1218961
	:	
	:	Judge:
Child Under the Age of Eighteen Years.	:	

-----oo0oo-----

COMES NOW Petitioner, LAURA MARIANO NAVAREZ (hereinafter "Petitioner" or "Ms. Navarez"), by and through counsel T. Laura Lui and of FILLMORE SPENCER, LLC, hereby submit this Verified Petition seeking custody and guardianship of the minor child, ZOE GUADALUPE OLIVA MARIANO. Petitioner alleges ZOE GUADALUPE OLIVA MARIANO is within the age of juvenile court jurisdiction and that she is an abused, abandoned and neglected child within the provision of UCA §80-3-201 et seq. This Petition is based upon the following allegations:

1. ZOE GUADALUPE OLIVA MARIANO is a female child, born in Mexico on September 19, 2017.
2. Petitioner Laura Mariano Navarez is child's biological mother. Ms. Navarez resides at 105 W 8835 S Trailer #9, Sandy , UT, 84070, and has done for the past 6 months.
3. Venue lies in this Court pursuant to UCA §80-1-102 et seq, in that the child resides in Salt Lake County with Ms. Navarez.
4. Child's mother is Laura Mariano Navarez. Her father is Leovigildo Oliva Renteria. The father resides in Mexico.
5. While in Mexico the minor child was subjected to domestic violence in her presence. Her father drank a lot and would often abuse and mistreat her mother in front of the child. There was no one to protect her.
6. The child's behavior and attitude were started to get aggressive because what she observed her father do. She fought a lot with the other children. She was affected by everything she saw, everything her father did to the family.
7. When the mother went to get help, the father threatened her that he was going to kill her and the children.
8. After the family left the step-father and tried to start a new life in Guerrero, Mexico, the gangs threatened not only the children but also the mother that they would kill them. The children's father had abandoned them and therefore did not

protect them. Due to domestic violence she witnessed and her fear of the increasing violent behavior of the gangs and the abandonment by her father, the family fled to the United States.

9. The Child is very bonded to Petitioner, and wish to remain in the United States in her care.
10. Child is enrolled in school and resides with Petitioner at 105 W 8835 S Trailer #9, Sandy , UT, 84070, and has done for the past 6 months.
11. A referral has been made to Utah Child Protective Services. The referral case number is 2936147.

**WHEREFORE** Petitioner prays that the Court find as follows:

1. THAT the above-named child is neglected and/or abandoned pursuant to Utah Code Ann. §80-3-301 et seq. in that biological father abused minor child, failed to protect the minor child and abandoned her in the United States without provision for her care.
2. THAT the above-named child is within the jurisdiction of the Juvenile Court;
3. THAT Petitioner is in all respects fit custodian and guardian for the child;
4. THAT it is in the child's best interest to appoint Petitioner as her custodian and guardian;
5. THAT reunification with the child's parent is not viable due to the fact that the father abused the child, has failed to protect the child, abandoned the child and the

biological father is unable or willing to come to the United States or care for her in the United States;

6. THAT it is not the best interest of the child to be returned to her country of nationality, or last habitual residence, as there are no suitable relatives or other persons there who are able to provide care for her. If returned to Mexico, the child would likely be subjected to further abuse, neglect or abandonment.

Based upon there finding, Petitioner respectfully moves the Court to:

1. ORDER that permanent custody and guardianship of the child be awarded to Petitioner;
2. For such other Orders as the Court deems necessary.

Dated this 5<sup>th</sup> day of December, 2022.

/s/ Laura Lui  
T. Laura Lui  
Attorney for Petitioner