

FILED FOR RECORD

02 FEB -4 PM 4:09

NO. 38338

MAK J. BRETTE
DISTRICT CLERK
ANDERSON COUNTY, TX

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| IN THE INTEREST OF | § | IN THE DISTRICT COURT |
| | § | |
| NIKKI MICHELLE | § | 3RD JUDICIAL DISTRICT |
| CURTIS/BOWMAN ROBERSON | § | |
| | § | |
| A CHILD | § | ANDERSON COUNTY, TEXAS |

**MOTION FOR TERMINATION OF CONSERVATORSHIP
AND FOR FINAL DISPOSITION OF THE BODY OF THE CHILD WHICH WAS
SUBJECT OF THIS SUIT**

COMES NOW, LARRY BOWMAN, Movant, for termination of conservatorship of the child subject of this suit NIKKI MICHELLE CURTIS BOWMAN ROBERSON and for orders granting Movant the right to determine the final disposition of the body of NIKKI MICHELLE CURTIS BOWMAN ROBERSON, a child, deceased, and for good cause would show the Court the following:

I.

NIKKI MICHELLE CURTIS BOWMAN ROBERSON had resided with Movant and his wife, VERNA BOWMAN continuously from birth, November 21, 1999 until a date shortly after November 16, 2001. Said Movant was named temporary managing conservator of this child on the 26th day of May, 2000, of which said orders were filed with this Court on June 16, 2000. On November 16, 2001, the parties agreed that Movant be named possessory conservator along with the paternal grandmother and that the biological father, ROBERT ROBERSON be named sole managing conservator. This agreement however has never been entered into the Court's file.

The child, NIKKI MICHELLE CURTIS BOWMAN ROBERSON died as a result of severe head trauma on the night of February 1, 2002 in Dallas, Texas at Children's Hospital. The father of the child, ROBERT ROBERSON is currently incarcerated in the Anderson County Jail under a \$1,000,000.00 bond for the capital murder of NIKKI MICHELLE CURTIS BOWMAN ROBERSON. The body of NIKKI MICHELLE CURTIS BOWMAN ROBERSON is currently being held at Bailey & Foster Funeral Home awaiting instructions for final disposition of the body.

II.

Movant, LARRY BOWMAN, herein requests the Court to terminate all conservatorships as to NIKKI MICHELLE CURTIS BOWMAN ROBERSON for reasons stated hereinabove. Additionally, Movant requests the Court grant orders authorizing movant as the person responsible for making all arrangements for the final disposition of the body of NIKKI MICHELLE CURTIS BOWMAN ROBERSON .

III. Prayer

Movant prays all conservatorships be terminated.

Movant prays the Court to grant orders authorizing movant the right to determine final disposition of the body of NIKKI MICHELLE CURTIS BOWMAN ROBERSON .

RESPECTFULLY SUBMITTED



DANIEL R. SCARBROUGH

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ATTORNEY FOR MOVANT

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served on each party in accordance with the Texas Rules of Civil Procedure on this the 4th day of February, 2002.


DANIEL R. SCARBROUGH

THE STATE OF TEXAS
COUNTY OF ANDERSON
I, JANICE STAPLES, CLERK OF THE DISTRICT COURT OF ANDERSON
COUNTY, TEXAS DO HEREBY CERTIFY THAT THE FOREGOING IS A TRUE
AND CORRECT COPY OF THE ORIGINAL, AS THE SAME APPEARS ON FILE
IN THE DISTRICT COURT, ANDERSON COUNTY, TEXAS. WITNESS MY
OFFICIAL HAND AND SEAL OF OFFICE THIS THE 6th DAY
OF February A.D. 20 02.

JANICE STAPLES
DISTRICT CLERK
ANDERSON COUNTY

BY 
DEPUTY