

Lesson 3: Family Law Summary

Lesson Summary

In Michigan, the terms *domestic relations* and *family law* are used to refer to a wide range of matters involving families, couples, and minor children. This lesson provides an overview of some of the most common family law topics, including divorce, the Friend of the Court, custody and parenting time, and spousal and child support. Although many family law topics are quite nuanced, a common thread is that family law clients are often experiencing a very stressful time in their lives.

Divorce Process Overview

Essentials

Michigan is a no-fault divorce state, as defined in MCL 552.6(1). A divorce judgment cannot be granted unless the plaintiff or defendant has resided in Michigan for 180 days preceding the filing of the complaint. MCL 552.9(1). The plaintiff or defendant must also have resided in the county in which the complaint is filed for 10 days immediately preceding the filing of the complaint. *Id.*

All divorce actions are filed in the family division of the circuit court. MCL 600.1021. The complaint for divorce must include certain information, and the pleadings that must accompany the initial filings vary depending on whether there are minor children. See MCR 3.206. Matters considered confidential under the statute or court rule do not need to be included in the complaint. MCR 3.206(A)(2). A summons must also be prepared and filed with the complaint. See MCR 2.102.

Depending on the circumstances of the case, parties may also consider filing ex parte orders for custody, parenting time, and support; temporary spousal support

orders; mutual ex parte restraining orders; domestic assault personal protection orders; or a request to opt out of the Friend of the Court.

Most divorce judgments require a court hearing at which proofs are taken, even when a consent judgment is being entered. MCR 3.210(B)(5)(a), (E)(1). However, there is a waiting period after the complaint is filed before proofs or testimony may be taken. MCL 552.9f; MCR 3.210(A). This waiting period also sets the earliest date on which the judgment may be entered. MCR 3.210(B)(5)(a). The minimum waiting period is 6 months if minor children are involved or 60 days without children. MCL 552.9f. In certain circumstances, the court can shorten the waiting period in cases with minor children from a minimum of 6 months to no less than 60 days if good cause is shown. MCL 552.9f; MCR 3.210(A).

In most cases, a consent judgment is negotiated during the divorce proceedings. The written divorce judgment should be prepared before testimony is taken at the *pro confesso* hearing. Friend of the Court approval of the consent judgment may be required by many counties if there are minor children.

Divorce judgments have certain mandatory provisions. See MCL 552.13, .101, .103; MCR 3.211(B). Judgments involving custody of a minor, child support, or spousal support have additional requirements. See MCL 552.603, .604, .625, 722.24, .31; MCR 3.211(C). If the order awarding child support or spousal support includes use of Friend of the Court services, there are extra requirements.

Any provisions regarding child or spousal support must be prepared by using a uniform support order. See SCAO forms FOC 10 and FOC 10a. The judgment must either incorporate the uniform support order by reference or state that none is required.

For more on the divorce process, see *Michigan Family Law* chs 5, 14 (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed).

Ex Parte Relief

Divorce differs from most civil actions because the court may grant part of the relief requested in the complaint at the beginning of the case or before the final judgment in one or more temporary orders. Common issues addressed in motions for ex parte orders include child custody, child support, parenting time, personal protection orders (PPOs), or financial restraining orders. In domestic violence cases, a PPO should be sought and obtained through a separate legal proceeding from the divorce. MCL 600.2950(1).

Settlement

All domestic relations matters, as defined in MCL 552.502(m), that involve property distribution are subject to mediation under MCR 3.216. Divorcing parties can choose from many types of alternative dispute resolution (ADR), including the following:

- Friend of the Court ADR
- court rule mediation
- arbitration
- collaborative law

For disputes regarding child custody or parenting time, the Friend of the Court is required to provide ADR to assist parties in voluntarily settling the dispute. See MCL 552.513. Courts may also order domestic relations mediation. MCR 3.216(A)(2). A domestic relations matter may reach mediation through a written stipulation of the parties, a written motion of a party, or the judge's order. MCR 3.216(C)(1).

Arbitration is also available by agreement of the parties with the approval of the court. The Domestic Relations Arbitration Act, MCL 600.5070 et seq., sets standards.

In collaborative law, the two clients and their attorneys work together along with financial experts and child experts (therapists) with the sole goal of reaching a fair and comprehensive settlement of all issues. MCL 691.1331 et seq.; MCR 3.222.

Discovery in Divorce Cases

Essentials

The formal discovery rules, MCR 2.301 et seq., pertain to all civil actions, including domestic relations cases. MCR 3.201(C). There are some differences, including higher interrogatory limits. Domestic relations matters can have 35 interrogatories, 15 more than the cap on interrogatories in civil cases. MCR 3.201(C).

Although all of the formal discovery options are available, attorneys in family law cases often gather substantial information from informal discovery, such as tax returns, financial records, and credit card statements. Family law attorneys often rely on informal discovery because it helps them prepare initial pleadings and make decisions about restraining orders. Formal discovery is also expensive, and costs tends to be more of an issue in family law cases.

In divorce cases, financial information is exchanged through use of SCAO form CC 320, Domestic Relations Verified Financial Information Form. See the instructions for SCAO form CC 320 for specifics on when it is used.

For more on discovery in family law cases, see *Michigan Family Law* ch 4 (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed).

Friend of the Court

Essentials

In Michigan, each circuit court has its own Friend of the Court (FOC) office. The FOC has the authority to investigate and enforce custody, parenting time, child support, medical support, and reimbursement issues. See MCL 552.151 et seq. (Divorce Act),

.501 et seq. (Friend of the Court Act), .601 et seq. (Support and Parenting Time Enforcement Act); MCR 3.201 et seq. The chief judge of each circuit oversees the FOC office. The FOC's role may be different from county to county and even from judge to judge. The duties of the FOC include

- informing the parties that alternative dispute resolution (ADR) is available;
- offering ADR services in child custody and parenting time disputes;
- investigating and making a written report and recommendation regarding custody, parenting time, and child support; and
- enforcing custody, parenting time, and child support orders.

The FOC must open and maintain an FOC case for each domestic relations matter unless the parties opt out of the FOC. To opt out of FOC services, the parties may file a joint motion with their initial pleadings. MCL 552.505a(2).

When the parties opt out, the FOC cannot be involved in enforcement, investigation, or accounting functions for support, custody, or parenting time. By opting out, parties assume responsibility for the administration and enforcement of the court's orders. Not all cases are eligible to opt out. See MCL 552.505a; see *also* SCAO forms FOC 100 (Domestic Relations Judgment Information), FOC 101 (Advice of Rights Regarding the Use of Friend of the Court Services), FOC 102 (Order Exempting Case from Friend of the Court Services).

For more on the FOC, see *Michigan Family Law* ch 6 (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed).

Investigations, Recommendations, and Mediation

When a court refers a dispute about custody, parenting time, or support, the Friend of the Court (FOC) must investigate all relevant facts and make a written report and recommendations to the parties, the parties' attorneys, and the court.

Investigations are handled in various ways across the state. In some offices, investigations are handled by caseworkers and in others by referees. Caseworkers may handle custody and support decisions while referees will conduct hearings on other matters raised by motion. In addition, the role and weight assigned to FOC decisions varies considerably, not only among counties but also among judges within any particular county.

For disputes regarding child custody or parenting time, the FOC is required to provide alternative dispute resolution to assist parties in voluntarily settling the dispute. MCL 552.513(1).

Referee Hearings

The type of motions referred to the Friend of the Court (FOC) varies widely from circuit to circuit. The FOC may hear motions on enforcement of child or spousal support or parenting time, allocations of household expenses, exclusive use of the home, or temporary custody and support. The FOC may not hear motions to increase or decrease spousal support.

Hearing procedures also vary widely. In some circuits, parties may be represented by counsel and may be allowed to present testimony, call witnesses, cross-examine witnesses, and submit evidence. Other courts have a more informal discussion format. Whatever the procedure in that county, the rules of evidence still apply and an electronic or stenographic record is required. MCR 3.215(D).

Within 21 days after a hearing, the referee must make a statement of findings on the record or submit a written, signed report containing a summary of testimony and a statement of findings. MCR 3.215(E)(1). Parties may object to the referee's recommendation within strict time deadlines. See MCR 3.215(E)(3)(d)(ii). The court must hold a de novo hearing on a party's request or the court's motion. MCL 552.507(4); MCR 3.215(E)(4). De novo hearings are either held by the trial judge conducting a new hearing, and perhaps taking additional testimony, or by a review of the record of the referee hearing only. Courts vary in this de novo review process county by county.

Enforcement

After an order has been entered regarding custody, child support, parenting time, or spousal support, the Friend of the Court's (FOC) enforcement division has authority to conduct hearings when the orders are not followed. See MCL 552.507(2)(a). The FOC can also make recommendations for enforcement. If the parties cannot reach a resolution with the enforcement officer, the case is sent to the judge or referred to the FOC depending on the county. Enforcement actions include bench warrants for arrest for nonpayment of support, fines, and costs.

Common enforceable support orders include medical, dental, and other health expenses; child care and educational expenses; and traditional cash payments. MCL 552.602(ii)(i). Courts have a number of mechanisms for enforcement available, including income withholding from wages and tax refunds, liens on real property, and contempt proceedings.

Property Division in Divorce Cases

Essentials

In Michigan, property is divided in divorce cases on the basis of equitable distribution. The presumption is that the division of assets will be roughly equal to each party. *Jansen v Jansen*, 205 Mich App 169, 171; 517 NW2d 275 (1994).

A trial court's first consideration is the determination of which assets are marital property and which assets are separate property, if any. *Byington v Byington*, 224 Mich App 103; 568 NW2d 141 (1997). Marital property is property "accumulated through the joint efforts of the parties during their marriage." *Leverich v Leverich*, 340 Mich 133, 137; 64 NW2d 567 (1954).

Evaluation of marital property may require an appraisal of assets, and identification and evaluation often involve experts. Assets can include real or personal property, financial, investment, or retirement accounts, and business interests.

Separate property is property not divisible on divorce absent special circumstances. Separate property includes

- property owned or earned before the marriage, including real estate equity accumulated before the marriage even if the property was titled in both parties' names, see *Reeves v Reeves*, 226 Mich App 490; 575 NW2d 1 (1997);
- property acquired during a period of cohabitation, see *Korth v Korth*, 256 Mich App 286; 662 NW2d 111 (2003);
- assets acquired by gift or inheritance by one party, see *Van Tine v Van Tine*, 348 Mich 189; 82 NW2d 486 (1957) (inheritance); *Hanaway v Hanaway*, 208 Mich App 278; 527 NW2d 792 (1995) (gift); and

- property inherited or gifted after filing, see *Polate v Polate*, 331 Mich 652; 50 NW2d 190 (1951); *Davey v Davey*, 106 Mich App 579; 308 NW2d 468 (1981).

For more on property division and division of retirement benefits, see *Michigan Family Law* chs 17, 18 (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed).

Dividing Assets and Liabilities

The factors considered by a trial court when dividing assets and liabilities and deciding spousal support tend to be interrelated. Trial courts have broad discretion in fashioning an award. Michigan courts consider the following factors when dividing marital property:

- length of the marriage
- contribution to the estate
- source of the property
- age, health, and station in life
- necessities and circumstances
- earning abilities
- needs of the parties and minor children
- cause of the divorce
- fault

Sparks v Sparks, 440 Mich 141; 485 NW2d 893 (1992). Fault may be considered in determining division of marital property and is a factor to be considered in spousal support. *Id.*

QDROs and EDROs

Retirement benefits can be a large asset in divorce cases. Michigan law requires every judgment of divorce to determine

- all rights each spouse has in any pension, annuity, or retirement benefit;
- any accumulated contribution in any pension, annuity, or retirement benefit; and
- any right or contingent right in and to any unvested pension, annuity, or retirement benefit.

MCL 552.101(3).

Retirement benefits are often divided using a qualified domestic relations order (QDRO). See 26 USC 414(p)(2). A QDRO designates an “alternate payee” to receive benefits under a retirement plan. See 26 USC 414(p)(1)(A), 29 USC 1056(d)(3)(B)(i). When the retirement plan covers a state or local government employee, deferred division of the plan benefits is made through an eligible domestic relations order (EDRO). See MCL 38.1701 et seq.

Spousal Support in Divorce Cases

Essentials

Spousal support may be awarded if the party seeking it can show both a need for support and an ability of the other party to pay, along with other facts and circumstances supporting the claim. There is great disparity in spousal support awards among counties and even among judges within a county. Michigan courts consider the following factors in determining whether spousal support should be awarded:

- past relations and conduct of the parties

- length of the marriage
- ability of the parties to work
- source and amount of property awarded to the parties
- age of the parties
- ability of the spouse to pay support
- present situation of the parties
- needs of the parties
- health of the parties
- prior standard of living of the parties and whether either party is responsible for others
- contribution of the parties to the joint estate
- fault in causing the divorce
- effect of cohabitation on a party's financial status
- general principals of equity

Loutts v Loutts, 298 Mich App 21, 31; 826 NW2d 152 (2012).

There are two types of support: rehabilitative (or transitional) and permanent. Rehabilitative spousal support is temporary support awarded to help a financially dependent spouse transition to self-support. It can be appropriate, for example, to encourage a spouse to seek full-time employment and self-sufficiency. *Wiley v Wiley*, 214 Mich App 614; 543 NW2d 64 (1995).

Permanent spousal support typically continues until death or remarriage. Permanent support can be appropriate when there is a long-term marriage with a spouse who has little or no career or marketable skills and the divorce occurs later in life where a nonearning spouse has a very short educational or career life ahead of them due to age. *Magee v Magee*, 218 Mich App 158; 553 NW2d 363 (1996).

All provisions regarding spousal support must be prepared on SCAO form FOC 10b, Uniform Spousal Support Order. The final judgment must either incorporate the uniform order by reference or state that none is required. All personal information concerning a party must be provided to the Friend of the Court in a judgment information form if the parties are seeking payments through the Friend of the Court.

For more on spousal support, see *Michigan Family Law* ch 16 (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed).

Child Custody and Parenting Time

Essentials

Child Custody

In Michigan, parents must be advised that joint custody is an option. MCL 722.26a(1). *Joint custody* means that the child resides alternately for specific periods with each parent and that the parents share decision-making authority on important decisions affecting the child's welfare. MCL 722.26a(7).

If parents agree on joint custody, the court must award joint custody unless the court determines on the record that it is not in the best interests of the child by clear and convincing evidence. MCL 722.26a(2); *see also* MCL 722.23.

Joint custody does not mean the parents share care of the child in an equal amount of time. Joint custody can mean anything that is reasonable and mutually agreed on by the parties.

Although not in the statute, colloquially, family law attorneys sometimes use the terms *physical custody* and *legal custody*. Physical custody is when a parent provides most of the day-to-day care for the child. Legal custody designates responsibility over major decisions regarding a child's upbringing, including medical treatment, enrollment in school, religious instruction, and participation in extracurricular activities.

When parents with joint custody cannot agree on essential matters, the court must decide the issue based on the child's best interests, as set forth by the 12 best interests factors, and must make specific findings of fact on the record. See *Fisher v Fisher*, 118 Mich App 227; 324 NW2d 582 (1982).

Parenting Time

Parenting time, formerly called visitation, is determined by the 9 parenting time factors, MCL 722.27a(7), and the 12 best interests factors, MCL 722.23. It is presumed to be in the best interests of the child to have a strong relationship with both parents. If the parents reach an agreement, the court must order the terms of that agreement unless it finds on the record by clear and convincing evidence that the terms are not in the child's best interests. MCL 722.27a(2).

The parent also decides all routine matters concerning the child during their parenting time. MCL 722.27a(11).

Ex Parte Determinations

With custody, the concept of established custodial environment places great importance on obtaining ex parte orders and temporary custody. However, the availability of ex parte temporary custody orders varies from court to court and county by county.

Obtaining a temporary order for parenting time in a nonemergency situation requires that a motion be filed and a hearing be scheduled. Depending on the county, a parenting time motion may be heard by the Friend of the Court referee instead of the judge. A party may also seek an ex parte interim order for parenting time in emergency situations.

For more on child custody and parenting time, see *Michigan Family Law* chs 9, 10 (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed).

Established Custodial Environment

Before entering or amending an existing custody order, the court must first determine whether there is an established custodial environment (ECE). MCL 722.27(1)(c); see *Baker v Baker*, 411 Mich 567, 579–580; 309 NW2d 532 (1981) (defining ECE).

Factors regarding whether an ECE exists include

- the age of the child,
- the physical environment, and
- the inclination of the custodian and the child regarding permanency of the relationship.

LaFleche v Ybarra, 242 Mich App 692; 619 NW2d 738 (2000) (quoting MCL 722.27(1)(c)).

An ECE can exist in more than one home. *Nielsen v Nielsen*, 163 Mich App 430; 415 NW2d 6 (1987). Courts can also find that no ECE exists in either parent’s household. *Baker*.

If no ECE exists, custody may be decided by a preponderance of the evidence that the proposed custodial arrangement would be in the best interests of the child. *Hall v Hall*, 156 Mich App 286; 401 NW2d 353 (1986).

Best Interests Factors

Once the trial court makes a finding on the existence of an established custodial environment, it must apply the best interests factors in MCL 722.23. *Underwood v Underwood*, 163 Mich App 383; 414 NW2d 171 (1987). The best interests of the child factors are the following:

(a) The love, affection, and other emotional ties existing between the parties involved and the child.

(b) The capacity and disposition of the parties involved to give the child love, affection, and guidance and to continue the education and raising of the child in his or her religion or creed, if any.

(c) The capacity and disposition of the parties involved to provide the child with food, clothing, medical care or other remedial care recognized and permitted under the laws of this state in place of medical care, and other material needs.

(d) The length of time the child has lived in a stable, satisfactory environment, and the desirability of maintaining continuity.

(e) The permanence, as a family unit, of the existing or proposed custodial home or homes.

(f) The moral fitness of the parties involved.

(g) The mental and physical health of the parties involved.

(h) The home, school, and community record of the child.

(i) The reasonable preference of the child, if the court considers the child to be of sufficient age to express preference.

(j) The willingness and ability of each of the parties to facilitate and encourage a close and continuing parent-child relationship between the child and the other parent or the child and the parents. A court may not consider negatively for the purposes of this factor any reasonable action taken by a parent to protect a child or that parent from sexual assault or domestic violence by the child's other parent.

(k) Domestic violence, regardless of whether the violence was directed against or witnessed by the child.

(I) Any other factor considered by the court to be relevant to a particular child custody dispute.

MCL 722.23.

Modification Thresholds

A trial court may not order a change of custody without first holding a hearing. The movant has the burden of proving by a preponderance of the evidence that either proper cause or a change in circumstances exists before the trial court can consider whether an established custodial environment (ECE) exists and conduct a review of the best interests factors. MCL 722.27(1)(c); *Vodvarka v Grasmeyer*, 259 Mich App 499; 675 NW2d 847 (2003). If an ECE exists, a change may be made only on clear and convincing evidence that the change is in the best interests of the child. MCL 722.27; *Duperon v Duperon*, 175 Mich App 77; 437 NW2d 318 (1989).

The standard is different for parenting time modifications. When the ECE will not be altered, the definition of proper cause or a change in circumstances is more expansive. *Shade v Wright*, 291 Mich App 17, 32; 805 NW2d 1 (2010). Normal life changes may be sufficient for a modification. If substantial changes in parenting time would alter the ECE, the stricter standard of proper cause or a change in circumstances applies.

Child Support

Essentials

Children, including adopted children, have an inherent right to support from their parents. MCL 722.3(1); *People v Coleman*, 325 Mich 618; 39 NW2d 201 (1949). A noncustodial parent has an obligation to assist in the support of the child even if the custodial parent has sufficient income to meet the needs of the child without financial assistance. *Beverly v Beverly*, 112 Mich App 657; 317 NW2d 213 (1981). The

remarriage of a noncustodial parent does not nullify or minimize the obligation to support. *Dillon v Dillon*, 318 Mich 686; 29 NW2d 126 (1947).

All child support calculations must begin with application of the Michigan Child Support Formula, including interim orders and modifications. MCL 552.605(2). The amount of child support recommended by the formula is presumed to be appropriate. *Calley v Calley*, 197 Mich App 380; 496 NW2d 305 (1992).

The current child support formula, along with accompanying supplement, are available on the SCAO website. The MiChildSupport Calculator is available online for free.

For more on child support, see *Michigan Family Law* ch 12 (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed).

Key Considerations Regarding the Formula

The court may enter an order that deviates from the child support formula if the court determines from the facts of the case that application of the formula would be unjust or inappropriate. MCL 552.605(2)(d).

If the court deviates from the formula, it must set forth in writing or on the record all of the requirements in MCL 552.605(2). The court may enter orders that deviate from the formula based on an agreement of the parties as long as the court satisfies all the requirements of the statute. MCL 552.605(2), (3).

Other Family Law Topics

Essentials

Paternity

In Michigan, the paternity of a child can be established under the following statutes:

- the Paternity Act, MCL 722.711 et seq.

- the Acknowledgment of Parentage Act, MCL 722.1001 et seq.
- the Summary Support and Paternity Act, MCL 722.1491 et seq.
- the Genetic Parentage Act, MCL 722.1461 et seq.
- the Uniform Interstate Family Support Act, MCL 552.2101 et seq.
- the Revised Uniform Reciprocal Enforcement of Support Act, MCL 780.151 et seq.
- the Michigan Adoption Code, MCL 710.21 et seq.
- the Revocation of Parentage Act, MCL 722.1431 et seq.
- the Assisted Reproduction and Surrogacy Parentage Act (ARSPA), MCL 722.1701 et seq.

In addition, the ARSPA can be used to establish parentage (not just paternity) “of a child conceived by the assisted reproduction.” MCL 722.1801.

The Child Custody Act of 1970, MCL 722.21 et seq., may not be used to determine paternity. See *Hoshowski v Genaw*, 230 Mich App 498; 584 NW2d 368 (1998); *Afshar v Zamarron*, 209 Mich App 86; 530 NW2d 490 (1995).

Adoption

The Michigan Adoption Code is set forth in MCL 710.21 et seq. In some cases, ancillary proceedings may be necessary to accomplish an adoption, including the following:

- the biological parent’s voluntary consent to the child’s adoption or release for adoption, MCL 710.28, .29, .44
- the involuntary termination of the rights of the putative father in conjunction with the biological mother’s voluntary consent or release, MCL 710.36, .37, .39

- the involuntary termination of the noncustodial legal parent's rights before the child is adopted by the custodial parent's spouse (commonly known as stepparent adoption), MCL 710.51(6)
- an action alleging that consent to adopt was arbitrarily and capriciously withheld by the Department of Health and Human Services, a child-placing agency, the court, or a tribal court and asking that the rights of the institution be terminated, MCL 710.45
- review by the court after filing a petition for adoption of a preplacement assessment with a conclusion of unsuitability, MCL 710.23f(9)

In cases involving Native American children, the proceeding is also subject to the Indian Child Welfare Act (ICWA), 25 USC 1901 et seq., and the Michigan Indian Family Preservation Act (MIFPA), MCL 712B.1 et seq.

Surrogacy

The ARSPA, which repealed and replaced the Surrogate Parenting Act, MCL 722.851 et seq., in 2025, legalizes paid surrogacy and outlines the procedures and criteria for establishing these agreements. MCL 722.1901–.1909.

Child Protective Proceedings

The family division of the circuit court has exclusive jurisdiction over child protective proceedings. MCL 600.1021(1)(e). In general, the Juvenile Code grants the family court subject-matter jurisdiction in protective proceedings when

- the parent fails to provide proper care,
- the parent's home is an unfit place for the child to live,

- the child is deemed “dependent” and “is in danger of substantial physical or psychological harm,” or
- the parent has placed the child in guardianship and has failed to comply with reunification plans.

MCL 712A.2(b).

Child protective proceedings involving non–Native American children are primarily governed by the Child Protection Law, MCL 722.621 et seq.; the Juvenile Code, MCL 712A.1 et seq.; and subchapter 3.900 of the Michigan Court Rules. In cases involving Native American children, the ICWA and the MIFPA apply.

For more on paternity, adoption, surrogacy, and child protective proceedings, see *Michigan Family Law* chs 13, 23, 25, 26 (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed).

Recommended Resources

1. Michigan Child Support Formula
2. Michigan Child Support Formula Supplement
3. MiChildSupport Calculator
4. *Michigan Family Law* (Hon. Marilyn J. Kelly, retired, et al eds, ICLE 8th ed) (subscription required)
5. *Michigan Family Law Benchbook* (ICLE 2d ed) (subscription required)
6. Michigan Judicial Institute, *Adoption Proceedings Benchbook* (3d ed)
7. Michigan Judicial Institute, *Child Protective Proceedings Benchbook: A Guide to Abuse & Neglect* (4th ed)
8. Michigan Judicial Institute, *Domestic Violence Benchbook: A Guide to Civil and Criminal Proceedings* (4th ed)

9. *Michigan Basic Practice Handbook* ch 2 (ICLE 6th ed) (subscription required)