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Minn. R. Civ. App. P. 136.01, subd. 1(c).*

**STATE OF MINNESOTA
IN COURT OF APPEALS
A25-0455**

In the Marriage of:

Colin Roy Zweber, petitioner,
Respondent,

vs.

Amanda Lee Zweber,
Appellant.

**Filed May 26, 2026
Affirmed
Bentley, Judge**

Dakota County District Court
File No. 19HA-FA-21-619

Valerie Arnold, Michael Cain, Arnold & Cain, PA, Minneapolis, Minnesota (for respondent)

Sam E. Khorroosi, Jessica Sampson, Khorroosi Law Office, P.A., St. Louis Park, Minnesota (for appellant)

Considered and decided by Bentley, Presiding Judge; Beane, Judge; and Florey, Judge.*

* Retired judge of the Minnesota Court of Appeals, serving by appointment pursuant to Minn. Const. art. VI, § 10.

NONPRECEDENTIAL OPINION

BENTLEY, Judge

This case comes before the court on appellant-mother's appeal from the district court's amended judgment and decree (J&D) relating to child custody, parenting time, and child support. Specifically, mother challenges the district court's amended determinations that the parties' joint child, M.Z., will primarily reside and attend school in Minnesota with father after she starts kindergarten and that mother must exercise portions of her parenting time in Minnesota. Mother argues that the district court's amended order was procedurally and substantively improper, that the district court abused its discretion at trial by allowing father to exercise comparatively more time in presenting his case, and that the district court judge was biased against her. We see no grounds on which to disturb the district court's amended J&D and therefore affirm.

FACTS

Mother, appellant Amanda Lee Zweber, is a Canadian citizen. In 2017, she married father, respondent Colin Roy Zweber, an American citizen. Mother had one nonjoint child, C.Z., before their marriage. Mother and C.Z. moved to Minnesota to be with father. Shortly after M.Z. was born in 2021, the marriage broke down. Mother traveled with both children to Canada and decided to leave C.Z. there to be with family. Mother returned to Minnesota with M.Z., and when M.Z. was about three months old, father filed for dissolution of the marriage. Father also filed a separate third-party visitation action related to C.Z.

During mother and father's dissolution proceeding, they engaged in extensive discovery and underwent multiple evaluations, including one by a neutral custody

evaluator. The district court ordered temporary parenting time schedules, in which mother and father generally had equal parenting time. Early in M.Z.'s life, the parties alternated parenting time on 48- and 72-hour bases with mother exercising much of that time in Minnesota and frequently traveling back and forth between Minnesota and Canada. Mother officially moved to Canada in February 2022. She also relinquished her and C.Z.'s legal permanent resident statuses in the United States. Eventually, the parties exercised parenting time on alternating weeks with mother exercising her time in Canada and father exercising his time in Minnesota.

Before trial, the parties participated in a settlement conference in January 2024 and were able to reach an agreement relating to dissolution of the marriage as well as the financial and property aspects of the dissolution. They also agreed to share joint legal custody of M.Z.

The parties went to trial on the issues of physical custody, parenting time, child support, and M.Z.'s primary residence. The trial took place over four days in February 2024. The district court received hundreds of exhibits and heard testimony from numerous witnesses including both parties, family members, a custody evaluator, and a custody-evaluation expert.

The district court dissolved the parties' marriage in a J&D following trial and determined that the existing parenting-time schedule would continue until M.Z. began kindergarten, with each parent receiving 50 percent of the parenting time. The district court also directed that mother would exercise her parenting time in Canada and father would exercise his time in Minnesota with the exception that:

Four times each year, Mother shall exercise one of her weeks of parenting time in Minnesota. Similarly, four times each year, Father shall exercise one week of his parenting time in Canada. This is so each parent may better understand [M.Z.'s] environment, friends and family relations in the other parent's location.

Then, when M.Z. begins kindergarten, the district court directed that she will "reside primarily with" mother in Canada and attend school there. The court specified that "[t]his is to ensure and maintain the strong sibling relationship with the non-joint child." Even so, the court noted its intention to achieve as close to 50/50 parenting time as possible. Father would "have parenting time over the child's entire summer break from school," as well as "on nearly all holidays," and "during all school breaks, with an additional day or two on either side of those breaks," in addition to exercising "additional parenting time in Canada for at least five weeks of the school year."

In reaching those determinations, the district court weighed all 12 statutory best-interests factors and determined that all but two factors were neutral. The district court found that the importance of maintaining M.Z.'s sibling relationship with C.Z. weighed in favor of M.Z. residing in Canada.

Father moved for amended findings under Minnesota Rule of Civil Procedure 52.02 and filed an accompanying memorandum of law. In his motion, he included a proposed amended order that requested myriad additions and deletions from the district court's best-interests findings. His corresponding explanations in support of those proposed changes generally contended that the changes were necessary to correct findings that were unsupported by the record, to address material omissions in the findings, and to address

misapplication of the law. Father also proposed that, having made those amended findings of fact, the district court should conclude that, after kindergarten, M.Z. should reside with father and attend school in Minnesota. Father proposed the following parenting-time schedule:

School Year: The schedule is based upon the . . . school district calendar and shall be modified annually to correspond with school days off. Mother shall have parenting time during the school year as follows, with the Thursday to Monday time frame consistent with her proposal for Father:

a. September:

Second weekend—Thursday after school to Monday at 12:00pm, in Minnesota.

Fourth weekend—Thursday after school to Monday at 12:00pm, in Minnesota.

. . . .

d. December:

First weekend—Thursday after school to Monday at 12:00pm, in Minnesota;

Third weekend—Thursday after school to Monday at 12:00pm, in Minnesota;

Christmas Holiday—December 22 at 2.50 hours before minor child's flight to December 26 at 2.50 hours before minor child's flight with Even Years with Father (in Minnesota) and Odd Years with Mother (in Canada).

. . . .

Summer: Father shall have parenting time during the summer school break as follows:

j. June:

From the final day of school to Sunday at 2.50 hours before minor child's flight of that weekend.

k. July:

Seven days beginning July 2nd. Canada Day (July 1st) shall be spent with Mother, with care exchange occurring on July 2nd.

I. August:

First full week of August, which will allow Mother to celebrate [M.Z.'s] birthday (August 14th) in Canada each year during her summer parenting time.

Separately, father filed a motion requesting the appointment of a parenting consultant or special master and for the district court to determine M.Z.'s primary medical and dental providers. Mother separately moved for the district court to order the parties to follow her proposed "step-up parenting time schedule," deny all of father's motions, award mother "tie-breaking authority over [M.Z.]'s non-emergency healthcare and dental care," and award her need-based attorney fees.

The district court scheduled and held a hearing on the motions in October 2024. Then, in January 2025, the court entered an amended J&D. Explaining its decision to amend the J&D, the district court stated:

Since the conclusion of the original Court Trial in this case, the filing of the respective motions and affidavits regarding amendment of the finding, and the arguments of counsel, the Court has considered and reflected further upon the parties' actions regarding their parenting of [M.Z.], as presented in the pleadings, testimony, arguments and exhibits from the dissolution parenting time trial. Upon further review and analysis of the best interest factors and reconsideration of the weight to be given to the significant testimony and evidence regarding those best interest factors, the Court has recognized the need to modify and amend, its findings, conclusions and order regarding parenting time based upon that original testimony in this case.

The amended J&D adopted some, but not all, of father's proposed findings. As a result, the court determined that seven of the best-interests factors favored father and his proposed parenting-time schedule. The remaining best-interests factors were neutral.

Addressing the prioritization of the sibling relationship in the initial J&D, the district court explained that, "[w]hile the case law references 'sibling preference' as one factor to be considered, the Court's custody determination must center on the child's best interests in balance with all relevant factors, and in especially maintaining a parent-child relationship, which is significantly more important than maintaining a sibling relationship." The district court also found that father's proposal was beneficial for M.Z.'s relationship with C.Z. because

the week-on/week off schedule would continue until [M.Z.] turns age six . . . in August of 2027 and would include additional time with [C.Z.], if visitation rights are granted, and would maximize [M.Z.] and [C.Z.'s] ability to spend time during the school year together and school breaks including the summer break which will be quality time.

Further explaining its amended findings and conclusion, the district court expressed concern about the possible alienation of C.Z. from father and the impact that it could have on M.Z.:

After further consideration and thought, the observation of these parties and their conduct, and seeing how impactful the influence of the older daughter could and will be upon [M.Z.], the Court finds that the parties' current situation does not bode well for maintaining a father-daughter relationship in the future. These issues largely stem from actions of Mother simply picking up and moving to Canada without discussion, planning, or anything else.

Ultimately, the district court determined based on its amended best-interests findings that mother and father should be awarded joint legal and joint physical custody with M.Z.’s “primary residence remaining in . . . Minnesota.” Central to the issues on appeal, the district court determined that once M.Z. entered kindergarten she would reside primarily with father and attend school in Minnesota. The district court included a postkindergarten parenting-time schedule adopting father’s proposal nearly verbatim.

Mother appeals.

DECISION

On appeal, mother’s arguments fall into three categories. First, she argues that the district court’s amended J&D was procedurally and substantively deficient. Second, she argues that the district court erred in its trial management by allowing father more time to present his case than she had to present hers. Third, she asserts that the amended J&D should be reversed because the district court was biased against her. We address each argument in turn.

I

Mother argues that the district court erred procedurally and substantively in amending the J&D. We first address mother’s argument that the district court abused its discretion by improperly reconsidering its previous decision under Minn. R. Gen. Prac. 115.11, rather than deciding only the motion for amended findings. Second, we discuss mother’s contention that the district court erred because it failed to rule on other motions made by both parties. And third, we reach mother’s substantive challenges to the district court’s decision.

A

Mother's primary procedural argument is that the district court abused its discretion in granting father's motion for amended findings because the district court "*sua sponte* reconsidered the evidence at trial and changed its mind on the child's primary residence without any explanation for the drastic change." Father maintains that the district court properly considered the motion for amended findings and acted within its discretion in reaching a different conclusion after amending its findings. We agree with father.

Under Minnesota Rule of Civil Procedure 52.02, "[u]pon motion of a party" served within the time permitted by the rules, "the court may amend its findings or make additional findings, and may amend the judgment accordingly if judgment has been entered." This court has explained that "[t]he purpose of a motion for amended findings is to permit the trial court a review of its own exercise of discretion." *Johnson v. Johnson*, 563 N.W.2d 77, 78 (Minn. App. 1997) (quotation omitted), *rev. denied* (Minn. June 30, 1997). A proper motion to amend "must both identify the alleged defect in the challenged findings and explain why the challenged findings are defective." *Lewis v. Lewis*, 572 N.W.2d 313, 315 (Minn. App. 1997), *rev. denied* (Minn. Feb. 19, 1998), *overruled on other grounds by Madson v. Minn. Mining & Mfg. Co.*, 612 N.W.2d 168 (Minn. 2000); *see State by Fort Snelling State Park Ass'n v. Minneapolis Park & Recreation Bd.*, 673 N.W.2d 169, 178 n.1 (Minn. App. 2003) (noting *Madson* overruled *Lewis* in part, but that, after *Madson*, *Lewis*'s discussion addressing the necessary components of a motion for amended findings remains good law), *rev. denied* (Minn. Mar. 16, 2004). Motions for amended findings "must be based upon the files, exhibits and minutes of the court, not upon newly discovered evidence

which is not a part of the record.” *Otte v. Otte*, 368 N.W.2d 293, 299 (Minn. App. 1985) (applying Minn. R. Civ. P. 52.02). “We review the district court’s decision whether to grant a motion for amended findings for an abuse of discretion.” *Landmark Cmty. Bank, N.A. v. Klingelhutz*, 927 N.W.2d 748, 754 (Minn. App. 2019).

Motions for amended findings are distinct from motions to reconsider, which “are prohibited except by express permission of the court” and “will be granted only upon a showing of compelling circumstances.” Minn. Gen. R. Prac.115.11. A party must request and receive prior permission from the court before filing a motion for reconsideration. *Id.*

Here, mother argues that the district court “*sua sponte*” reconsidered its previous judgment, rather than properly considering father’s motion for amended findings. We understand this argument to contend that the amended J&D was nonresponsive to father’s motion or at least went beyond the relief requested in father’s motion. But that argument is belied by the record. Each aspect of the amended J&D that mother challenges on appeal was presented in father’s motion and addressed at the hearing. Indeed, the district court adopted verbatim some of the language from father’s proposal. Nothing about the district court’s order reflects sua sponte reconsideration of issues that were not fairly before the district court.

To the extent mother argues that the district court abused its discretion by making “drastic” amended findings, we are not persuaded. As the Minnesota Supreme Court explained in *McCauley v. Michael*:

Rule 52.02 itself places no restrictions on the court in ruling upon a motion for amended findings. A party may, of course, choose to challenge only selected findings, but by

making the motion the party is in essence asking the judge to reexamine all of the evidence in the case to see if [the] initial findings accurately reflect [the judge's] view of that evidence. Since findings of fact are frequently interrelated, and since a number of findings may be based upon a single piece of evidence or the testimony of a single witness, the trial judge must be free to review all of the evidence and all of [the] findings when such a motion is made. . . . The trial judge must be free to examine all of the evidence . . . , and then to enter amended findings as appear to [the judge] warranted by [the judge's] review of the record as a whole.

256 N.W.2d 491, 499-500 (Minn. 1977). The district court had wide latitude when deciding father's motion for amended findings and, contrary to mother's assertions, it acted within its discretion when it reweighed or reexamined the evidence in its entirety and reached a different conclusion.¹

B

Mother also argues that the amended J&D constitutes an abuse of discretion because the district court did not decide the other motions that were heard with the motion for amended findings. In her reply brief, she asserts that "the fact that the court did not issue any separate decision on these motions was an abuse of discretion."

We disagree with mother that the district court failed to address the motions or otherwise abused its discretion in how it managed the posttrial motions. The amended J&D either explicitly or implicitly denied the motions. With respect to her motion for attorney

¹ Mother also contends that the district court committed procedural error by improperly considering evidence outside the record when making its amended findings. However, mother failed to point to any portion of the amended J&D that suggests the district court went outside the record from trial. As mother has pointed to no evidence that the district court considered facts outside the record and we see none ourselves, we conclude mother is not entitled to relief on this basis.

fees, the district court explicitly denied the request “[b]ased upon the evidence admitted at trial.” It concluded that “[m]other has failed to allege, much less establish” that the fees are necessary, that mother failed to establish that father has the means to pay the fees, “as [f]ather testified that he has not yet had the ability to pay his own attorney and has had to borrow funds during these proceedings,” and that mother failed to show “that she lacks the means to pay necessary attorney’s fees and costs.”

As to her motion for the “step-up parenting time schedule,” it is apparent that motion was implicitly denied because the district court adopted father’s proposed parenting-time schedule, rather than mother’s proposed “step-up” schedule. *See Palladium Holdings, LLC v. Zuni Mortg. Loan Trust*, 775 N.W.2d 168, 177-78 (Minn. App. 2009) (stating that “[a]ppellate courts cannot assume a district court erred by failing to address a motion, and silence on a motion is therefore treated as an implicit denial of the motion”), *rev. denied* (Minn. Jan. 27, 2010). And, regarding the motion for tie-breaking authority over non-emergency medical and dental care, the district court determined in the amended J&D that “[t]he parties shall make rational, informed, and unified decisions regarding [M.Z.’s] non-emergency healthcare and dental care,” again implicitly denying mother’s request.

Mother asserts that father filed motions that also went unaddressed, but to the extent the motions were implicitly denied, father has not sought review of the denials, and mother does not assert a basis to challenge them herself. For these reasons, we will not disturb the district court’s J&D on this basis.

C

In addition to her procedural challenges, mother asserts that there are substantive deficiencies in the district court's decision that amount to an abuse of discretion. First, she argues that the district court erred by miscalculating equal parenting time. Second, she contends that the district court abused its discretion by failing to justify its requirement that she exercise a portion of her parenting time in Minnesota. And third, she asserts that the district court did not give adequate weight to preserving the sibling relationship.

“The district court has broad discretion in determining parenting-time issues and will not be reversed absent an abuse of that discretion.” *Dahl v. Dahl*, 765 N.W.2d 118, 123 (Minn. App. 2009). A district court may abuse its discretion by “making findings of fact that are unsupported by the evidence, misapplying the law, or delivering a decision that is against logic and the facts on record.” *Woolsey v. Woolsey*, 975 N.W.2d 502, 506 (Minn. 2022) (quotation omitted).

First, mother argues that the district court abused its discretion by miscalculating equal parenting time. Her argument, however, relies on an inaccurate reading of the J&D. Mother claims that the schedule leaves her with only 93 overnights and father with the rest. In contrast, father describes the schedule as awarding him 190 overnights and mother 176 overnights. We understand this difference to stem from divergent readings of the summer schedule. That portion of the parenting time schedule reads:

Summer:

i. June:

From the final day of school to Sunday at 2.50 hours before minor child's flight of that weekend.

ii. July:

Seven days beginning July 2nd. Canada Day (July 1st) shall be spent with Mother, with care exchange occurring on July 2nd.

iii. August:

First full week of August, which will allow Mother to celebrate [M.Z.'s] birthday (August 14th) in Canada each year during her summer parenting time.

Mother appears to read this portion of the schedule as describing her parenting time with the implication that father has parenting time during all other times not explicitly described. Under that reading, she would receive only about two weeks of parenting time in the summer. In contrast, we understand father's position to be that the district court adopted his proposed schedule such that the summer parenting time listed describes his limited time with M.Z. during the summer, with mother receiving the rest.

Father has the better reading of the district court's amended judgment. Reading the amended J&D in its entirety, it is evident that the district court intended to adopt and implement father's proposed parenting time schedule accompanying his motion for amended findings. Throughout the amended J&D, the district court cites father's proposal favorably and discusses how it results in close to a 50/50 parenting time split. Then, the district court adopted that proposed schedule nearly verbatim, omitting only an explanatory phrase at the beginning of the proposed summer schedule stating, "[f]ather shall have parenting time during the summer school break as follows." We do not believe that the omission of that language signals that the district court intended to depart from father's proposal. On the contrary, even without that language, it is apparent that the summer

portion of the schedule spells out the time to be exercised by father, with mother getting the rest of the time.

For example, the amended J&D says, “[s]even days beginning July 2nd. Canada Day (July 1st) shall be spent with Mother, with care exchange occurring on July 2nd.” It would not make sense to read this as mother receiving the week following July 2nd because it specifically states that mother should receive July 1st. Such a reading is also most consistent with the district court’s stated intent “that the parties achieve as close to 50/50 parenting time as possible.” As mother herself points out, her interpretation would deviate significantly from that goal. Therefore, applying our reading of the amended J&D, the district court granted close to equal parenting time.

Second, mother argues that the district court abused its discretion by requiring mother to spend four weeks of her parenting time in the prekindergarten schedule in Minnesota when father is no longer required to do the same in Canada. Mother posits that this requirement is not in M.Z.’s best interests and that mother cannot afford to travel to Minnesota during those time periods and be away from her job. Mother disagrees with the district court’s decision, but she does not assert that any of the district court’s findings are clearly erroneous. The district court found that father lacks the flexibility to work remotely from Canada for any extended period based on his employer’s policies. It also found that mother has family in Minnesota that she has stayed with when visiting and that she was awarded a condo in Minnesota in the pretrial settlement agreement, giving mother housing options that father does not have in Canada. The record supports those findings, so they do not amount to an abuse of discretion.

Mother also has not argued that the district court misapplied the law. The amended J&D shows that the district court considered the required statutory factors for determining custody and parenting-time issues. *See* Minn. Stat. § 518.17, subd. 1(a) (2024). We are not convinced that having mother exercise some of her parenting time in Minnesota is against logic and the facts in the record such that the district court abused its discretion. In sum, we conclude that the district court did not abuse its discretion by ordering mother to spend a portion of her prekindergarten parenting time in Minnesota.

Third, we reach mother's assertion that the district court abused its discretion by giving too little weight to the preservation of M.Z.'s relationship with C.Z. in its amended J&D. On review, however, the law regarding custody and parenting time "leaves scant if any room for an appellate court to question the [district] court's balancing of best-interests considerations." *Vangsness v. Vangsness*, 607 N.W.2d 468, 477 (Minn. App. 2000). Put differently, this court is not permitted to reweigh the best interests of the child in this case to give more weight to the sibling relationship.

The amended J&D shows that the district court closely considered the sibling relationship. The district court considered all 12 best-interests factors, including "the effect of the proposed arrangements on the ongoing relationships between the child and each parent, siblings, and other significant persons in the child's life." Minn. Stat. § 518.17, subd. 1(a)(9). Indeed, the district court devoted about eight pages in the order to its analysis of that factor alone. The district court acknowledged that the law favors not separating siblings but that the "sibling preference" is only one factor to be considered while balancing "all relevant factors, and in especially maintaining a parent-child relationship, which is

significantly more important than maintaining a sibling relationship.” The district court then reasoned that, based on the seeming alienation of C.Z. toward father and the possibility that mother and her family have contributed to that alienation, having M.Z. share a primary residence with C.Z. in Canada risks undermining M.Z.’s relationship with father. The possible risks of parental alienation are supported in the record. Despite its concerns, the court continued to emphasize its opinion that it favored “a continuing strong, positive, and close relationship” between the siblings, and concluded that father’s parenting time proposal in which M.Z. spends most breaks and the summer in Canada with C.Z. supports that relationship because their time together would be “quality time” while not in school.

Overall, the district court’s findings and weighing of the sibling relationship was not an abuse of discretion because it did not “mak[e] findings of fact that are unsupported by the evidence, misapply[] the law, or deliver[] a decision that is against logic and the facts on record.” *Woolsey*, 975 N.W.2d at 506 (quotation omitted). We therefore decline to reverse on that ground.

II

Mother also asserts that the trial court erred by giving father more time to present his case than she had. Generally, “the conduct of trial [is] left to the discretion of the trial court.” *Lundman v. McKown*, 530 N.W.2d 807, 829 (Minn. App. 1995), *rev. denied* (Minn. May 31, 1995). This includes decisions related to “[t]he mode, manner, and method of receiving testimony.” *Manion v. Tweedy*, 100 N.W.2d 124, 130 (Minn. 1959). As a result, the decision should not be reversed unless there was an abuse of that discretion. *Manion*,

100 N.W.2d at 130. A new trial is warranted “only if the errors resulted in prejudice to the complaining party.” *Lundman*, 530 N.W.2d at 829.

As the district court has discretion in managing the flow of trial, *Lundman*, 530 N.W.2d at 829, and receiving testimony, *Manion*, 100 N.W.2d at 130, it need not give both parties equal time, and mother cites no legal authority to that effect. In any event, mother cannot show that the district court’s trial management prejudiced her case. *Lundman*, 530 N.W.2d at 829. Mother has not argued that, as a result of the difference in time, she was unable to present any evidence or witnesses. To the contrary, at one point, mother’s counsel explained what they had left to present and stated, “the parties have had extensive opportunities to present their case. We would have time left over.” Then, toward the end of the trial, her counsel waived an opportunity for redirect examination when it was given and explained, “I think we are comfortable having used so much less time than [father], and we think the Court has had more than enough evidence to make its decision.” Given that, mother seems to be arguing that the district court abused its discretion by failing to give her relief she did not seek. Mother has not established that the district court abused its discretion.

III

Finally, mother argues that the amended J&D should be reversed because the district court was biased against her, as shown by the district court “improperly revers[ing] its own determination” regarding M.Z.’s primary residence and undoing “nearly all previous positive findings about Mother, in favor of new negative findings about Mother.” Father argues that mother failed to preserve this argument because she did not raise it before the

district court, but mother maintains that she could not have raised the issue of bias at trial or shortly after because she did not learn of it until the amended J&D was filed.

It is true that mother raised the issue of judicial bias for the first time on appeal, and we ordinarily do not consider arguments that were not made in the district court. *See Thiele v. Stich*, 425 N.W.2d 580, 582 (Minn. 1988) (“A reviewing court must generally consider only those issues that the record shows were presented and considered by the trial court in deciding the matter before it.” (quotation omitted)). But even assuming that the issue is properly before us, we are not persuaded that the district court’s determination was affected by any bias.

Minnesota judges are required to perform their duties “without bias or prejudice.” Minn. Code Jud. Conduct Rule 2.3(A). To be disqualifying, such bias or prejudice “must stem from an extrajudicial source,” resulting in an opinion “on some basis other than what the judge learned from [their] participation in the case.” *In re Est. of Lange*, 398 N.W.2d 569, 573 (Minn. App. 1986). Appellate courts review allegations of judicial bias de novo. *See State v. Reek*, 942 N.W.2d 148, 156 (Minn. 2020).

To support her bias claims, mother points only to the amended J&D and its findings about her. Adverse rulings alone, however, do not amount to judicial bias. *Olson v. Olson*, 392 N.W.2d 338, 341 (Minn. App. 1986). Mother otherwise cites no extrajudicial source from which the bias might stem, and in our own review of the record, we see none. *See Lange*, 398 N.W.2d at 573.

At oral argument, mother also argued that, even if each of the procedural and substantive challenges she raises do not individually amount to an abuse of discretion or

judicial bias, when considered together they show that the district court was impermissibly predisposed against mother. However, mother provided no legal support for this cumulative-effects argument, and given that lack of legal authority, we conclude that mother forfeited this argument. *See State v. Bursch*, 905 N.W.2d 884, 889 (Minn. App. 2017) (“Arguments are forfeited if they are presented in a summary and conclusory form, do not cite to applicable law, and fail to analyze the law when claiming that errors of law occurred.”).

We have independently reviewed the record on appeal and do not discern any judicial bias. We therefore decline to disturb the district court’s amended J&D on this basis.

Affirmed.