

**Petrilla v. Castillo, No. 67566, Order of Affirmance (Unpublished Disposition, Feb. 12, 2016)**  
**SC UNPUB**

\*\*\*

To the extent that appellant challenges the district court's custody ruling, the issue is rendered moot by the intervening termination of appellant's parental rights.

Whether a party has waived the right to past support is a question for the trier of fact. Appellant has not demonstrated that he made this argument in the district court. Thus, the trier of fact had no opportunity to consider whether respondent waived her right to recover the cost of support, and appellant has waived the right to argue it on appeal.