

EXHIBIT 18

1
2 **WASHINGTON STATE COURT OF APPEALS DIVISION III**
3 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
4 IN AND FOR THE COUNTY OF SPOKANE

5 IN RE:) CAUSE NO. 15-3-02130-1
6) 15-5-00185-5
7 C.S.)
8) COA NO. 35974-3-III
9 Child,)
10)
11 WAYNE JANKE and DORIS)
12)
13)
14 STRAND,)
15)
16)
17 Respondents,) TRANSCRIPT OF PROCEEDINGS
18)
19 RONALD D. SIMON and TERESA)
20)
21)
22 SIMON,)
23)
24 Appellants.)

13 VERBATIM REPORT OF PROCEEDINGS
14 BEFORE THE HONORABLE COMMISSIONER HOSKINS

15 April 16, 2015

16 Spokane County, Washington

17 APPEARANCES:

18 For Simons: Gary Stenzel
19 1304 W. College Avenue
20 Spokane, WA 99201
21 For Janke: Spencer Harrington
22 1517 W. Broadway Avenue
23 Spokane, WA 99201
24 Transcription Service: Amy M. Brittingham
25 2210 Maryhill Street SE
 East Wenatchee, WA 98802
 (509) 594-2196
Proceedings recorded by electronic sound recording;
transcript produced by transcription service.

1 information rather than less in making a decision at the
2 beginning here because it decides, quite frankly, a lot of
3 issues going forward.

4 THE COURT: Well and I guess let me ask this.

5 Is it and you eluded to this a little bit. Is it plead as a
6 defacto parentage so in theory I'm gonna say no defacto
7 parentage, it's dismissed, you've also plead it as a third
8 party custody.

9 MR. HARRINGTON: We have.

10 THE COURT: So, tomorrow won't --- it can't be
11 your case is dismissed, you're done and then you could
12 potentially appeal it. I suppose it would continue on.

13 MR. HARRINGTON: It ---

14 THE COURT: Do you understand what I'm asking?

15 MR. HARRINGTON: Yes, it would likely continue
16 on with a next hearing set regarding placement under the non-
17 parental custody.

18 THE COURT: Okay, um ---

19 MR. HARRINGTON: Again, this is not a run of the
20 mill. This is ---

21 THE COURT: Right and I have experience with
22 defacto parentage. I was a guardian ad litem so I'm fairly
23 familiar with this. I'll have to kind of brush up on it.
24 But, I'm concerned about having me hear this and I don't know
25 if Amanda was aware of what kind of case this was.

1 MR. HARRINGTON: I'm not ---

2 THE COURT: Was anyone really informed what kind
3 of case this was? I'm feeling like we should maybe talk to
4 her and see. I don't have a problem reading it and
5 potentially doing the hearing tomorrow, but it sounds like if
6 it's this much information to start with, I don't know that
7 I'm the right person to hear it.

8 MR. HARRINGTON: Okay, so well ---

9 THE COURT: That's --- that's my concern.

10 MR. HARRINGTON: Let me --- let me ask you this.
11 Can we deal with at least the issue of the page limits will
12 be excused, but whether it's going to be heard tomorrow and
13 by who we haven't decided that.

14 THE COURT: And I'm not sure --- I guess I would
15 ask Steve, do you know is it two pro tem commissioners
16 tomorrow or are there any regular commissioners? Do you
17 know?

18 THE CLERK: I'll take a look.

19 MR. HARRINGTON: I was under the impression that
20 Commissioner Rugel was here because he did do the prior TRO
21 that we're doing the return on.

22 THE COURT: Okay.

23 MR. HARRINGTON: So, I had thought that it was
24 you as a pro tem and Commissioner Rugel as a commissioner,
25 but apparently I was mistaken.

EXHIBIT 19

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3 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
4 IN AND FOR THE COUNTY OF SPOKANE

5 IN RE:) CAUSE NO. 15-3-02130-1
6) 15-5-00185-5
7 C.S.)
8) COA NO. 35974-3-III
9)
10 Child,)
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17 RONALD D. SIMON and TERESA)
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1 MR. HARRINGTON: I'm not ---

2 THE COURT: Was anyone really informed what kind
3 of case this was? I'm feeling like we should maybe talk to
4 her and see. I don't have a problem reading it and
5 potentially doing the hearing tomorrow, but it sounds like if
6 it's this much information to start with, I don't know that
7 I'm the right person to hear it.

8 MR. HARRINGTON: Okay, so well ---

9 THE COURT: That's --- that's my concern.

10 MR. HARRINGTON: Let me --- let me ask you this.
11 Can we deal with at least the issue of the page limits will
12 be excused, but whether it's going to be heard tomorrow and
13 by who we haven't decided that.

14 THE COURT: And I'm not sure --- I guess I would
15 ask Steve, do you know is it two pro tem commissioners
16 tomorrow or are there any regular commissioners? Do you
17 know?

18 THE CLERK: I'll take a look.

19 MR. HARRINGTON: I was under the impression that
20 Commissioner Rugel was here because he did do the prior TRO
21 that we're doing the return on.

22 THE COURT: Okay.

23 MR. HARRINGTON: So, I had thought that it was
24 you as a pro tem and Commissioner Rugel as a commissioner,
25 but apparently I was mistaken.

1 THE COURT: Okay.

2 THE CLERK: I have yeah, Commissioner Rugel all
3 day and you all day.

4 MR. HARRINGTON: So, my understanding was this
5 was gonna go to --- and again, my hope was it would go to
6 Commissioner Rugel.

7 THE COURT: Okay.

8 MR. HARRINGTON: And he probably doesn't want to
9 review it either. I understand it is voluminous, but that's
10 the nature of these petitions at the outset.

11 THE COURT: And I guess, I mean it's one thing
12 adequate cause for a parenting plan mod and you find adequate
13 cause and temporary orders. But, this sounds like it's gonna
14 be more on --- this is a little more detailed because I can
15 tell you a defacto parentage case I had years and years ago
16 was before they even assigned commissioners and Commissioner
17 Arrow was assigned to it because it had to stay with one
18 person because it was so --- so much paperwork and
19 information in there.

20 I --- I think I would like to try to get a hold of
21 Amanda and be able to explain to her the case and see if she
22 wants to talk to Commissioner Rugel if I should be the one to
23 do it.

24 MR. HARRINGTON: okay.

25 THE COURT: Because if he wants --- if he would

1 MR. HARRINGTON: That's okay.

2 THE COURT: You might want to turn the volume
3 down.

4 MR. HARRINGTON: You can entertain the
5 courtroom.

6 THE COURT: Alright, hold on. Thanks.

7 [OFF THE RECORD]

8 THE COURT: Hello, Steve?

9 MR. HARRINGTON: Steve just stepped in the back,
10 but we're still on the record.

11 THE COURT: Oh, okay. Hi, okay, I just talked
12 to Amanda downstairs and I --- she would like to talk to
13 Commissioner Ressa to see if she would take it. What I'm
14 inclined to do is I will pick up the file. I will read what
15 I can tonight and see how much I can do tomorrow to see if
16 it's gonna be assigned to another commissioner. So, I guess
17 we'll know more at docket call in the morning. If that makes
18 sense? I mean I'll read what I can, but when I explained it
19 to Amanda, she agreed that it probably should go to a regular
20 commissioner as opposed to a pro tem. Is there specific
21 issues I can address tomorrow to kind of ---

22 MR. HARRINGTON: Well ---

23 THE COURT: The situation status quo for a week
24 to continue it or is it ---it's hard because I can't even
25 seen the file to know what exactly is set for tomorrow.

1 MR. HARRINGTON: Okay, I can tell you what's set
2 for tomorrow is there is a return on a TRO. The TRO places
3 C.S. with petitioners. So, that issue is going to be heard
4 tomorrow. So, that may just need to be extended and Mr.
5 Stenzel should be here for that, obviously.

6 THE COURT: Okay.

7 MR. HARRINGTON: And then ---

8 THE COURT: What I'll do is I'll --- what I'm
9 willing to do is I'm not gonna sign an order extending page
10 limits or anything like that at this point. I will take the
11 file home. I will read it tonight and then what we'll
12 probably have to do is a bench conference with me or
13 something in the morning after dockets.

14 MR. HARRINGTON: Okay, that's fine.

15 THE COURT: After I have a chance to really look
16 at the file and see what's going on. Does that make sense?

17 MR. HARRINGTON: Yeah, that's fine and I believe
18 we dropped off bench copies to Amanda.

19 THE COURT: Okay.

20 MR. HARRINGTON: That has all of our pleadings
21 and I believe all of Mr. Stenzel's pleadings. So, that might
22 be the easiest way to look at the file.

23 THE COURT: Okay, I will and I'm gonna be over
24 there probably ion about half an hour, forty-five minutes, to
25 pick up the file. So, I'll take a look at it and then I will

1 just --- and if you could let Mr. Stenzel know what's going
2 on and I'll address as much as I can at docket and I'll
3 probably know more in the morning when I get to the
4 courthouse.

5 MR. HARRINGTON: Okay.

6 THE COURT: And talk to Commissioner Ressa and
7 Commissioner Rugel, okay?

8 MR. HARRINGTON: Fair enough. I will see if Mr.
9 Stenzel is upstairs and tell him. If not, I will send his
10 office a letter this afternoon.

11 THE COURT: Okay, great. Thank you. I'm gonna
12 hang up and Steve could just take me off the record.

13 THE CLERK: I'll take you off the record.

14 THE COURT: Okay great. Thank you.

15 [COURT ADJOURNED]

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EXHIBIT 20

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FILED4
APR 17 20155
SPOKANE COUNTY CLERK6
7 **SUPERIOR COURT OF WASHINGTON, FOR SPOKANE COUNTY**8 In re:
9 Christopher Simon,
Child,
10 Wayne Janke and Doris Strand,
Petitioners,
11 and
12 Ronald Simon and Teresa Simon,
Respondent.

13 NO. 15-5-00185-5

14 Order Assigning/Reassigning
Commissioner

15 (Clerks Action Required)

16 ID NUMBER:

17 Upon motion of [V] the court [] the parties [] the attorney(s) [] other, this case should be
18 assigned/reassigned to a/another Commissioner for the following reasons:

- 19
-
- 20 [X] No Commissioner previously assigned
-
- [] Another Commissioner has current or prior involvement with same case/family
-
- 21 [] Conflict of Interest
-
- 22 [] Other: _____
-
- 23

Wherefore, it is hereby ordered, adjudged and decreed that

- 24
25 [X] This case is assigned to Commissioner Rugel
26 [] This case is reassigned from Commissioner _____
27 to Commissioner _____

Dated: 4-17-15
28

Judge/Commissioner

TONY M. RUGEL

1
2
3
FILED
4

5 APR 17 2015
6

7 SPOKANE COUNTY CLERK
8

9
10 **SUPERIOR COURT OF WASHINGTON, FOR SPOKANE COUNTY**
11

12 In re:
13 Christopher Simon,
14 Child,
15 Wayne Janke and Doris Strand,
16 Petitioners,
17 and
18 Ronald Simon and Teresa Simon,
19 Respondents.
20

21 NO. 15-5-00185-5
22

23 Motion, Declaration and ORDER
24

25 RE: Exceeding Page Limitations Per
26 LSPR 94.04(a)(10)
27

28 **I. MOTION**

29 COMES NOW the petitioners, through their counsel, and move the Court for an Order to
30 exceed page limitations per LSPR 94.04(a)(10) for the return on TRO and Temporary Orders
31 hearing on Friday, April 17, 2015.

32 Dated: 4/16/15



33 Spencer W. Harrington, WSBA # 35907
34 Attorney for Petitioners
35

36 **II. DECLARATION**
37

38 I, Spencer W. Harrington, declare:

- 39 1. I am counsel for petitioners in a de facto parentage petition which was filed on March 31,
40 2015. An ex parte restraining order was issued and served on the respondents.
41
42 2. Respondents retained counsel and appeared before this court on a motion to quash the ex
43 partre restraining order which was heard on April 3, 2015.

3. This is a very unique case which started with the child in question filing a CHINS petition against his biological parents.

4. Since this case was filed 16 days ago, there have been 22 declarations filed between the parties and many supporting documents (pictures, cards, medical records, etc.)

5. Counsel for the parties have conferred and believe it is essential to this case that all information is before the court as the rights implicated are substantial and the court should have as much information as possible to make such an important decision.

6. A Guardian ad Litem, Kimberly Kamel, has already been agreed to by counsel for the parties and an order is in the process of being prepared and presented.

7. Petitioners have filed 13 declarations totaling 22.75 pages, plus multiple documents evidencing their parenting of the child. The respondents have filed 9 declarations totaling 15.5 pages, plus multiple documents evidencing their position as to parenting of the child.

8. It is imperative that all the information be before the court, including the child's CHINS petition (#15-7-00716-8) which was heard by Commissioner Ressa. Petitioners have been unsuccessful in obtaining a copy of the transcript of the hearing which as heard on April 1, 2015.

9. It is requested that the court waive the page limitation rule in this matter for both parties and the matter be set for additional read. There will be a total of 38.25 pages, plus multiple additional photos, records and the CHINS file (#15-7-00716-8).

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. Signed at Spokane, Washington on April 16, 2015.

Spencer W. Harrington, WSBA # 35907
Attorney for Petitioners

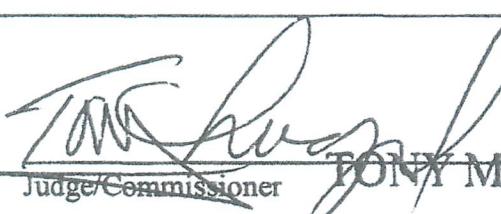
1
2 **III. ORDER**

3 IT IS ORDERED that:

4 Petitioners' motion is granted denied.

5 Other: _____
6
7
8
9
10

11 Dated: 4-17-15

12 
13 TONY M. RIGEL
14 Judge/Commissioner

15 Presented by: 

16 Spencer W. Harrington, WSBA # 35907
17 Attorney for Petitioners

18 Approved by: *although not Concurring
w/ declaration, there is*
19 
20 Gary K. Stenzel, WSBA #16794
21 Attorney for Respondents
22
23
24
25
26
27

28 ** is a need for
an extra page
order*

RECEIVED

APR 20 2015

Stenzel Law Office

COPY
ORIGINAL FILED

APR 17 2015

SPOKANE COUNTY CLERK

SUPERIOR COURT OF WASHINGTON, FOR SPOKANE COUNTY

In re the Custody of:

Christopher Simon,

Child,

Wayne Janke and Doris Strand,

Petitioners,

and

Ronald Simon and Teresa Simon,

Respondents.

NO. 15-5-00185-5

**REISSUANCE OF Ex Parte
Restraining Order/Order to Show
Cause
(Nonparental Custody)
(TPROTSC/ORTSC)**

Clerk's Action Required
 Law Enforcement Notification,
 ¶4.1

Restraining Order Summary:

[] Does not apply. [X] Restraining Order Summary is set forth below:

Name of person(s) restrained: Ronald Simon and Teresa Simon.

Name of person(s) protected: Wayne Janke, Doris Strand and Christopher Simon.

See paragraph 4.1

Violation of a Restraining Order in Paragraph 4.1 Below With Actual Knowledge of its Terms is a Criminal Offense Under Chapter 26.50 RCW and Will Subject the Violator to Arrest. RCW 26.10.115.

I. Show Cause Order

It is ordered that Ronald Simon and Teresa Simon appear and show cause, if any, why the restraints below should not be continued in full force and effect pending final determination of this action and why the other relief, if any, requested in the motion should not be granted. A hearing has been set for the following date, time and place:

Date: April 24, 2015

Time: 8:30 am

Place: Spokane County Superior Court
1116 W. Broadway, Spokane, WA

Room/Department: 401

If you disagree with any part of the motion, you must respond to the motion in writing before the hearing and by the deadline for your county. At the hearing, the court will consider *Written* sworn affidavits or declarations. Oral testimony may *Not* be allowed. To respond, you must:

(1) file your documents with the court; (2) provide a copy of those documents to the judge or commissioner's staff; (3) serve the other party's attorney with copies of your documents (or have the other party served if that party does not have an attorney); and (4) complete your filing and service of documents within the time period required by the local court rules in effect in your county. If you need more information, you are advised to consult an attorney or a courthouse facilitator.

Failure to Appear May Result in a Temporary Order Being Entered by the Court Which Grants the Relief Requested in the Motion Without Further Notice.

II. Basis

A motion for a temporary restraining order without written or oral notice to (name of nonrequesting party) Ronald Simon and Teresa Simon or that party's lawyer has been made to this court. The court has consulted the judicial information system, if available, to determine the existence of any information and proceedings that are relevant to the placement of the child.

III. Findings

Indian Child Welfare Act

Indian child status:

- The child(ren) are not Indian child(ren) as defined by 25 U.S.C § 1903 and the Indian Child Welfare Act, 25 U.S.C. § 1901, et seq., does not apply to these proceedings.

The court adopts paragraphs 2.1, 2.2, and 2.4 of the Motion/Declaration for an Ex Parte Restraining Order and for an Order to Show Cause (Form WPF CU 03.0150) as its findings, except as follows:

IV. Order

It Is Ordered:

4.1 Restraining Order

Violation of a Restraining Order in Paragraph 4.1 With Actual Notice of its Terms Is a Criminal Offense Under Chapter 26.50 RCW and Will Subject the Violator to Arrest. RCW 26.10.115.

- Does not apply.
 Ronald Simon and Teresa Simon is/are restrained and enjoined from disturbing the peace of Wayne Janke, Doris Strand and Christopher Simon.
 Ronald Simon and Teresa Simon is/are restrained and enjoined from going onto the grounds of or entering the home, work place or school of the protected person(s) or the day care or school of the following named child: Christopher Simon.

1
2 [X] Ronald Simon and Teresa Simon is/are restrained and enjoined from knowingly coming
3 within or knowingly remaining within (distance) 2 blocks of the home, work place, or school
4 of the protected person(s) or the day care or school of this child: Christopher Simon.

5 [X] Ronald Simon and Teresa Simon is/are restrained and enjoined from molesting, assaulting,
6 harassing, or stalking Wayne Janke, Doris Strand and Christopher Simon.

7 [X] **Clerk's Action.** The clerk of the court shall forward a copy of this order, on or before
8 the next judicial day, to (name of appropriate law enforcement agency) Spokane County
9 Sheriff/Police Dept. which shall enter this order into any computer-based criminal
10 intelligence system available in this state used by law enforcement agencies to list
11 outstanding warrants. (A law enforcement information sheet must be completed
12 by the party or the party's attorney and provided with this order before this
13 order will be entered into the law enforcement computer system.)

Service

10 The requesting party must arrange for service of this order on the restrained party. File the original
11 Return of Service with the clerk and provide a copy to the law enforcement agency listed above.

4.2 Other Restraining Order

13 [X] Ronald Simon and Teresa Simon is/are restrained and enjoined from permanently removing
14 the child from the state of Washington.

[X] The child shall reside with Wayne Janke and Doris Strand until the hearing.

[] Other:

4.3 Surrender of Deadly Weapons

[] Does not apply.

[X] It is ordered that Ronald Simon and Teresa Simon surrender any deadly weapon in his or her
immediate possession or control or subject to his or her immediate possession or control to:

[X] the Spokane county sheriff. Or turn firearms over to a 3rd party.

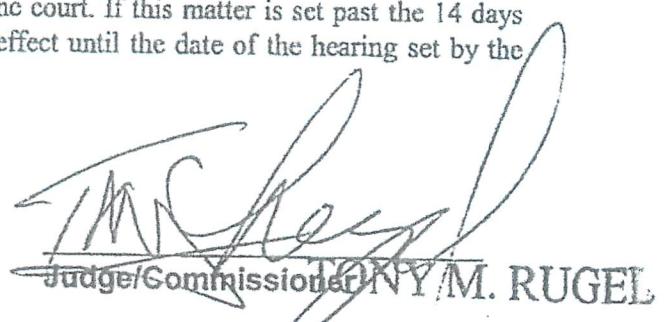
The court finds that irreparable injury could result if an order is not issued until the time for
response has elapsed. (See RCW 26.09.060(2)(b).)

4.4 Expiration Date

This order shall expire on the hearing date set forth above or 14 days from the date of issuance,
which ever is sooner, unless otherwise extended by the court. If this matter is set past the 14 days
from entry, this order shall remain in full force and effect until the date of the hearing set by the
court.

4.5 Other

Dated: 4-17-15 at 9:20 ⁽⁰⁰⁾ a.m./p.m.


Judge/Commissioner J.M. RIGEL

Harrington Law Office, PLLC
1517 W. Broadway Avenue
Spokane, WA 99201
Phone: 509.344.2200

1
2 Presented by:

3 Spencer W. Harrington, WSBA #35907
4 Attorney for Petitioners

Approved by:

Gary R. Stenzel, WSBA # 16974
5 Attorney for Respondents 41833

EXHIBIT 21

Fwd: Gr 31.1

From: TJ Simon (agentappraiser@gmail.com)
To: corrieamsden@yahoo.com
Date: Thursday, September 17, 2020, 04:15 PM PDT

----- Forwarded message -----

From: **TJ Simon** <agentappraiser@gmail.com>
Date: Thu, Sep 17, 2020 at 4:14 PM
Subject: Re: Gr 31.1
To: Callan, Ashley <ACallan@spokanecounty.org>

On Thu, Sep 17, 2020 at 4:10 PM Callan, Ashley <ACallan@spokanecounty.org> wrote:
Thanks

Ms. Simon –

The court clerk in commissioner courtrooms is responsible for recording a hearing through the FTR software. It is the judicial officers discretion if a

hearing needs to be recorded or not. Normally, the hearings that could be appealed are recorded.

I am not aware of a local court rule regarding which hearings are recorded.

Thank you,

Ashley Callan

Superior Court Administrator

477-4401

Notice: All email sent to this address will be received by the Spokane County email system and may be subject to public disclosure under GR 31.1 and to archiving and review.

From: TJ Simon [mailto:agentappraiser@gmail.com]

Sent: Thursday, September 17, 2020 3:14 PM

To: Callan, Ashley <ACallan@SpokaneCounty.org>

Subject: Gr 31.1

Ex Parte Court Hearings - being recorded

Good afternoon Ms. Callan,

Who, in a courtroom, specifically ex parte court, is responsible for ensuring that the hearings that should be recorded are recorded?

And are there specific local rules?

Teresa Simon

(509) 535-6500

--
Teresa Simon
(509) 535-6500

--
Teresa Simon
(509) 535-6500

EXHIBIT 22



SPOKANE COUNTY COURT HOUSE

SPOKANE COUNTY

TIMOTHY W. FITZGERALD

*County Clerk
Clerk of the Superior Court*

August 11, 2020

Teresa Simon
TJ Simon <agentappraiser@gmail.com>

RE: Email request dated August 7, 2020 – 15-5-001855

Ms. Simon:

Your email of August 7, 2020 you requested documentation showing that law enforcement was provided a copy of the Agreed Temporary Order filed April 24, 2015. Since this order did not have the "Clerks Action Required" box checked, nor did it specify that law enforcement would be provided a copy, our office cannot verify that this order was sent to law enforcement. Please contact Police Records for information regarding this order.

In addition to this request, you also requested documentation regarding a copy of the audio of hearings on April 17, 2015, April 24, 2015, and April 27, 2015.

April 17, 2015 - The Order Assigning Commissioner Rugel filed on was on the courts own motion and was signed by Commissioner Rugel and was not on the record. The Order Exceeding Page Limits filed on April 17, 2015 was signed by both party's attorneys as well as Commissioner Rugel. Because of this, there is no audio recording.

April 24, 2015 - The Agreed Temporary Order filed has no audio because both party's attorneys signed the order along with Commissioner Rugel. Agreed orders typically do not have audio recording because there is no oral argument.

April 27, 2015 - The Order Appointing Guardian Ad Litem was signed by all parties except for the appointed GAL who approved it telephonically. It was signed and dated by Commissioner Pelc on and filed the same day. Since it was agreed, there is no audio recording for this hearing.

Sincerely,



Suzanne McBride
Executive Assistant to Timothy W. Fitzgerald
Spokane County Clerk
1116 W. Broadway Ave., #300
Spokane, WA 99260-0090

"Attachments"
Order Assigning Commissioner
Order Exceeding Page Limits
Agreed Temporary Order
Order Appointing Guardian Ad Litem on Behalf of Minor

EXHIBIT 23

 SUPERIOR COURT OF WASHINGTON COUNTY OF SPOKANE <i>In re:</i> WAYNE JANKE and DORIS STRAND and RONALD SIMON and TERESA SIMON <i>Petitioners,</i> <i>Respondents.</i>	<i>REASON FOR ORDER</i> CASE NO. 15-6-00185-6 ORDER ASSIGNING/ REASSIGNING COMMISSIONER (CLERKS ACTION REQUIRED)
---	--

Upon motion of the court the parties the attorney(s) other, this case should be assigned/reassigned to a/another Commissioner for the following reasons:

- No Commissioner previously assigned
- Another Commissioner has current or prior involvement with same case/family
- Conflict of interest
- Other _____

Wherefore, it is hereby ordered, adjudged and decreed that

- This case is assigned to Commissioner Rugel
- This case is reassigned from Commissioner _____ to Commissioner _____

Dated: 1/20/15


Judge/Commissioner

These files were merged from

155-00185-5 to 153-2130-1
on 09-10-2015

Search [] Result Set : 95 |

CASE NUMBER	SUB...	CASE TITLE	DOCUM...	DOCUMENT DESCRIPTION	FILE DATE	SECURITY	JUDGM...	DEST...	Pages	
201505001855	41.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	RPY	REPLY DCLR OF WAYNE JANKE	04/15/2015	No	No	3		
201505001855	42.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	RPY	REPLY DCLR OF DORIS STRAND	04/15/2015	No	No	5		
201505001855	43.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	CP	COPY / PICTURES OF PET'S HOME ETC.	04/15/2015	No	No	28		
201505001855	44.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	CP	COPY / SAMPLES OF ACTIVITIES	04/15/2015	No	No	6		
201505001855	45.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	CP	COPY / MEDICAL INSURANCE FOR CHILD	04/15/2015	No	No	2		
201505001855	46.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	CP	COPY / CARDS & NOTES TO PET'S	04/15/2015	No	No	21		
201505001855	47.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF DENISE BUCKO	04/15/2015	No	No	2		
201505001855	48.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF GAYLE JOHNSON	04/15/2015	No	No	2		
201505001855	49.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF JOLENE WARWICK	04/15/2015	No	No	1		
201505001855	50.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF ROBIN BLACKWOOD	04/15/2015	No	No	3		
201505001855	51.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF TED AUGUSTINE	04/15/2015	No	No	3		
201505001855	52.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	RSP	RESPONSE OF RESPONDENT'S	04/15/2015	No	No	3		
201505001855	53.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF ROB CARLSON	04/16/2015	No	No	2		
201505001855	54.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	OR	ORDER ASSIGNING COMM/COMM RUGEL	04/17/2015	No	No	1		
201505001855	55.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	OR	ORDER EXCEEDING PAGE LIMITATIONS	04/17/2015	No	No	3		
201505001855	56.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	NTMTDK	NOTE FOR MOTION DOCKET / EXPARTE	04/17/2015	No	No	1		
201505001855	57.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	TPROTSC	TEMP REST ORD & ORD TO SHO CAUS	04/17/2015	No	No	4		
201505001855	58.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	OR	ORDER ASSIGNING COMM/COMM RUGEL	04/20/2015	No	No	1		
201505001855	59.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	MTFR	MOTION FOR REVISION / COMM RULING	04/20/2015	No	No	3		
201505001855	60.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	TRMIN	TRIAL MINUTES	04/21/2015	No	No	1		
201505001855	61.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	TMRO	TEMP RESTRAINING ORDER / AGREED	04/24/2015	No	No	4		
201505001855	62.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	ORAPGL	ORDER APPOINTING GUARDIAN AD LITEM	04/27/2015	No	No	8		
201505001855	63.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	AGOR	AGREED ORDER TO STRIKE REVISION	05/01/2015	No	No	2		
201505001855	64.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	NTAB	NOTICE OF ABSENCE/UNAVAILABILITY	06/24/2015	No	No	1		
201505001855	65.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	NTTSA	NT FOR TRIAL & STMT OF ARBITRABL	07/02/2015	No	No	2		
201505001855	66.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	OB	OBJECTION TO CERT OF READINESS	07/10/2015	No	No	1		
201505001855	67.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	NTHG	NOTICE OF HEARING	07/10/2015	No	No	2		
201505001855	68.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	CNRSE	CONFIDNTL REPORT IN SEALED ENVELOPE	07/17/2015	CONFID...	No	No	3	
201505001855	69.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION RESPONDENT	07/17/2015	No	No	2		
201505001855	70.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	MTAF	MOTION AND AFFIDAVIT/DECLARATION	07/17/2015	No	No	2		
201505001855	71.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	NTHG	NOTICE OF HEARING	07/17/2015	No	No	2		
201505001855	72.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	RPT	REPORT FAMILY LAW/PAT MT STATUS	07/24/2015	No	No	1		
201505001855	73.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	OR	ORDER RE ORJ TO CERT OF READINESS	07/24/2015	No	No	2		
201505001855	74.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	TRMIN	TRIAL MINUTES	07/24/2015	No	No	1		
201505001855	75.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF WAYNE JANKE	08/03/2015	No	No	4		
201505001855	76.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	CNRSE	CONFIDNTL REPORT IN SEALED ENVELOP	08/03/2015	CONFID...	No	No	5	
201505001855	77.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	CNRSE	CONFIDNTL REPORT IN SEALED ENVELOPE	08/05/2015	CONFID...	No	No	4	
201505001855	78.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION/REBUTTAL OF R SIMON	08/05/2015	No	No	4		
201505001855	79.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF SAM COURCHAIN	08/05/2015	No	No	3		
201505001855	80.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF JAYN COURCHAIN	08/05/2015	No	No	3		
201505001855	81.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	RPT	REPORT FAMILY LAW/PAT MT STATUS	08/07/2015	No	No	2		
201505001855	82.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	TRMIN	TRIAL MINUTES	08/07/2015	No	No	1		
201505001855	83.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	TRMIN	TRIAL MINUTES	08/07/2015	No	No	1		
201505001855	84.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	MTSC	MOTION FOR ORDER TO SHOW CAUSE	09/03/2015	No	No	2		
201505001855	85.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLR	DECLARATION OF RONALD SIMON	09/03/2015	No	No	2		
201505001855	86.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	ORTSC	ORDER TO SHOW CAUSE	09/03/2015	No	No	1		
201505001855	88.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	OR	ORDER RE: STATUS OF CASE	09/10/2015	No	No	2		
201505001855	87.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	DCLRM	DECLARATION OF MAILING 9-10-15	09/10/2015	No	No	1		
201505001855	88.1	JANKE, WAYNE & STRAND, DORIS VS SIMO...	TRMIN	TRIAL MINUTES	08/07/2015	No	No	1		
201505001855	88.2	JANKE, WAYNE & STRAND, DORIS VS SIMO...	TRMIN	TRIAL MINUTES	08/07/2015	No	No	1		
201505001855	89.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	RQ	REQUEST TAPE/CD	06/10/2016	No	No	1		
201505001855	90.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	AFPT	AFFIDAVIT OF PETITIONER DORIS STRAN	11/28/2016	No	No	5		
201505001855	91.0	JANKE, WAYNE & STRAND, DORIS VS SIMO...	CNRSE	CONFIDNTL REPORT IN SEALED ENVELOPE	11/28/2016	CONFID...	No	No	3	

EXHIBIT 24

04/12/2015

Stenz - Ron would like to file an amended declaration. He is scheduled for eye surgery.in 11 days.



TJ Simon <agentappraiser@gmail.com>

Ron would like to file an amended declaration. He is scheduled for eye surgery.in 11
days.

Stenz2193@comcast.net <Stenz2193@comcast.net>
To: TJ Simon <agentappraiser@gmail.com>

Sun, Apr 12, 2015 at 9:20 AM

Cannot file anymore declarations by local rule. Sorry

Sent from Xfinity Connect Mobile App

----- Original Message -----

From: TJ Simon
To: Stenzel Law Office
Sent: April 12, 2015 at 9:06 AM
Subject: Ron would like to file an amended declaration. He is scheduled for eye surgery.in 11 days.

Ron is legally blind in one eye. He will be out of commission after surgery for about 2 weeks after surgery.
That means he will not be able to lift his head or the surgery will be rendered useless or almost ineffective.
[Quoted text hidden]

216

Fwd: April 3, 2015 Orders

From: TJ Simon (agentappraiser@gmail.com)
To: corrieamsden@yahoo.com
Date: Saturday, August 8, 2020, 05:44 PM PDT

----- Forwarded message -----

From: TJ Simon <agentappraiser@gmail.com>
Date: Thu, Aug 6, 2020 at 4:24 PM
Subject: Fwd: April 3, 2015 Orders
To: Corrie Amsden <corrieamsden@yahoo.com>

----- Forwarded message -----

From: Cassandra Taggart <cassandra.stenzellaw@gmail.com>
Date: Mon, Apr 13, 2015 at 2:00 PM
Subject: April 3, 2015 Orders
To: TJ Simon <agentappraiser@gmail.com>

Teresa,

Attached are copies of the Orders entered on Friday April 3, 2015. Please note that there is no hearing tomorrow and it is set for Friday April 17, 2015 @ 8:30 am. You need to be on telephone stand by at 9:15-9:30 to know what time and what courtroom your hearing is. The 8:30 is for Attorney's only to do a roll call.

--
If you have any questions, please contact our office.

Very Truly Yours,

Cassandra Taggart
Paralegal to Robert J. Hervatine

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--
Teresa Simon
(509) 535-6500

Teresa Simon
(509) 535-6500



simon orders 040315.pdf
292.5kB



EXHIBIT 25

Fwd: Hearing

From: TJ Simon (agentappraiser@gmail.com)
To: corrieamsden@yahoo.com
Date: Saturday, August 8, 2020, 05:19 PM PDT

Forwarded Conversation

Subject: Hearing

From: Cassandra Taggart <cassandra.stenzellaw@gmail.com>
Date: Mon, Apr 20, 2015 at 9:09 AM
To: TJ Simon <agentappraiser@gmail.com>
Cc: Gary Stenzel <Stenz2193@comcast.net>

Teresa,

Your hearing has now been set for April 24, 2015. I have let Gary know that Ron has eye surgery the day before and will not be able to appear in person.

--
If you have any questions, please contact our office.

Very Truly Yours,

Cassandra Taggart
Paralegal

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From: Cassandra Taggart <cassandra.stenzellaw@gmail.com>
Date: Mon, Apr 20, 2015 at 9:12 AM
To: TJ Simon <agentappraiser@gmail.com>
Cc: Gary Stenzel <Stenz2193@comcast.net>

Teresa,

The hearing is set for 1:30 pm with Comm. Rugel in Room 306

--
If you have any questions, please contact our office.

Very Truly Yours,

Cassandra Taggart
Paralegal to Robert J. Hervatine

--
Teresa Simon
(509) 535-6500

EXHIBIT 26

Fwd: Order Assigning Commissioner and Ex Parte TRO

From: TJ Simon (agentappraiser@gmail.com)

To: corrieamsden@yahoo.com

Date: Saturday, July 25, 2020, 02:34 PM PDT

----- Forwarded message -----

From: Cassandra Taggart <cassandra.stenzellaw@gmail.com>

Date: Tue, Apr 21, 2015 at 10:19 AM

Subject: Order Assigning Commissioner and Ex Parte TRO

To: TJ Simon <agentappraiser@gmail.com>

Teresa,

Attached for your records are the above-referenced pleadings.

--
If you have any questions, please contact our office.

Very Truly Yours,

Cassandra Taggart
Paralegal to Robert J. Hervatine

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--
Teresa Simon
(509) 535-6500

 simon order.pdf
46.5kB

 simon ex parte order.pdf
227.6kB

EXHIBIT 27

Fwd: GAL Order

From: TJ Simon (agentappraiser@gmail.com)

To: corrieamsden@yahoo.com

Date: Friday, August 7, 2020, 07:04 AM PDT

----- Forwarded message -----

From: Cassandra Taggart <cassandra.stenzellaw@gmail.com>

Date: Tue, Apr 21, 2015 at 1:56 PM

Subject: GAL Order

To: TJ Simon <agentappraiser@gmail.com>

Teresa,

You and Ron will need to sign this and get back to our office. You can scan and email me your signatures or drop by the office whichever is more convenient.

--
If you have any questions, please contact our office.

Very Truly Yours,

Cassandra Taggart
Paralegal to Robert J. Hervatine

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--
Teresa Simon
(509) 535-6500



simon gal order.pdf

338.6kB

Superior Court of Washington County of Spokane

In re:
Christopher Simon,

No. 15-5-00185-5

Wayne Janke and Doris Strand,
Petitioners,
and
Ronald Simon and Teresa Simon,
Respondents.

Order Appointing Guardian ad Litem on Behalf of Minor (ORAPGL)

L. Basis

1.1 Basis for the Appointment

This appointment is being made pursuant to

- | | | | |
|--------------------------|-----------------------------|-------------------------------------|---|
| <input type="checkbox"/> | RCW 26.09 Dissolution | <input checked="" type="checkbox"/> | RCW 26.10 Non-parental Custody/or
De Facto Parental status |
| <input type="checkbox"/> | RCW 26.44 Abuse and Neglect | <input checked="" type="checkbox"/> | RCW 26.26 Paternity |
| <input type="checkbox"/> | RCW 26.50 Domestic Violence | | <i>- De Facto Parentage</i> |

1.2 Children to Whom the Order Applies

The petitioners respondent court moved for appointment of a guardian ad litem for the following minor child in this action:

Name
Christopher Simon

Age
13

II. Findings

After reviewing the case record to date and the basis for the motion, the court *finds* that the motion should be granted because appointment of a guardian ad litem is in the best interest of the child.

III. Order

It is Ordered:

3.1 Appointment of Guardian ad Litem

Kimberly A. Kamel is appointed as guardian ad litem for the above-named minor child of the parties and shall receive copies of all pleadings and notice of all court proceedings regarding the child.

3.2 Duties of the Guardian ad Litem

The guardian ad litem shall investigate and report factual information regarding the issues ordered to be reported or investigated to the court. The guardian ad litem shall always represent the child's best interests. The guardian ad litem may make recommendations based on her investigation. The guardian ad litem shall report the child's expressed preferences regarding the parenting plan to the court, together with the facts relative to whether any preferences are being expressed voluntarily and the degree of the child's understanding.

The guardian ad litem shall make a full and complete written report to the court and counsel/parties at least 60 days before trial provided that an extension may be granted by the court. This report shall include recommendations and bases for those recommendations.

Issues ordered to investigate and report:

- | | | | | | | |
|--|--------------------------|--------|--------------------------|--------|--------------------------|-------|
| <input checked="" type="checkbox"/> all issues relating to development of a parenting plan | <input type="checkbox"/> | mother | <input type="checkbox"/> | father | <input type="checkbox"/> | other |
| <input type="checkbox"/> substance abuse of | <input type="checkbox"/> | mother | <input type="checkbox"/> | father | <input type="checkbox"/> | other |
| <input type="checkbox"/> domestic violence of | <input type="checkbox"/> | mother | <input type="checkbox"/> | father | <input type="checkbox"/> | other |
| <input type="checkbox"/> mental health issues of | <input type="checkbox"/> | mother | <input type="checkbox"/> | father | <input type="checkbox"/> | other |
| <input type="checkbox"/> physical health issues of | <input type="checkbox"/> | mother | <input type="checkbox"/> | father | <input type="checkbox"/> | other |
| <input type="checkbox"/> sexual abuse allegations of | <input type="checkbox"/> | mother | <input type="checkbox"/> | father | <input type="checkbox"/> | other |
| <input type="checkbox"/> criminal history of | <input type="checkbox"/> | mother | <input type="checkbox"/> | father | <input type="checkbox"/> | other |
| <input type="checkbox"/> abandonment or neglect by | <input type="checkbox"/> | mother | <input type="checkbox"/> | father | <input type="checkbox"/> | other |
| <input type="checkbox"/> integration into the non-primary parent's home | | | | | | |
| <input checked="" type="checkbox"/> other: Whether or not Petitioners are de facto parent to the Minor Child or if this case should be treated as a third-party non-parental custody case. | | | | | | |

1 The guardian ad litem shall also report to the court any other issues discovered that
2 could affect the safety of the child.

2 OTHER: For purposes of this Order, the guardian ad litem shall be deemed an Expert under
3 Evidence Rule 706.

4 **3.3 Other Duties**

5 Other duties of the guardian ad litem include appearing at all court hearings and pretrial
6 conferences within the scope of appointment unless excused by the court and assisting the
7 parties and counsel in reaching a resolution of the matters involving said child.

8 **3.4 Guardian ad Litem Access to Child, Records and Information**

9 To facilitate reasonable investigation of information pertaining to the best interest of the
10 child, the guardian ad litem shall have access to the child and to all records and
11 information, including authorization to speak with interested persons, from the following
12 sources: law enforcement agencies; Child Protective Services (or the equivalent out-of-state
13 agency); health care providers; mental health care providers; child care providers; the
14 Department of Social and Health Services (or the equivalent agency in another state); and
15 educational institutions.

16 These agencies may withhold or blackout portions of requested information as warranted
17 by law or by court order. The guardian ad litem shall maintain the confidentiality of
18 information except as necessary to fulfill his or her duties as guardian ad litem.

19 Within the scope of appointment, the guardian ad litem shall have access to all Superior
20 Court and Juvenile Court files, including any sealed/confidential portions thereof, other
21 than records sealed pursuant to RCW 13.50.050(7). All information obtained from sealed
22 or confidential files shall remain sealed or confidential, and the guardian ad litem shall
23 inform the court if the guardian ad litem report contains sealed or confidential information.

24 The court clerk shall provide certified copies of this order to the guardian ad litem upon
25 request and without charge.

26 Upon good cause shown, the guardian ad litem or the parties may move that the court make
27 confidential any reports or documents placed in the court file by the guardian ad litem.

28 OTHER: The guardian ad litem shall have access to alcohol and drug treatment records
29 whether written or oral and including, but not limited to TASC and other information
30 regarding the child and the parties. The records shall be released directly to the guardian ad
31 litem upon presentation of a copy of this order, either in person or by mail, at no cost.

1 The guardian ad litem shall have access to all records indicated herein at no cost for the
2 child and each parent. Access to those records indicated herein shall include records of the
3 child over the age of 12 if that/those child/children have signed this order.
4

3 The parties and their attorneys agree that the guardian ad litem may redisclose in her report
4 any and all mental and physical health treatment records, criminal histories, police records
5 and alcohol/drug treatment history of the parties.

5 **3.5 Payment of Fees and Costs**

6 The guardian ad litem fee is \$200.00 per hour up to \$15,000, the maximum the guardian ad
7 litem may charge without additional court review and approval.

8 The fees and costs of the guardian ad litem shall be paid as follows:^{*}

- 9 50% by petitioners and 50% by respondents
10 ____% by other:
11 Other:

12 If the guardian ad litem has been appointed at public expense, the court may assess this cost
13 against the parties if there is a change in financial circumstances.

14 **OTHER:**

15 a. In private pay cases, the fees and costs of the guardian ad litem shall be paid as follows:

- 16 The initial advance of \$5,000.00 shall be paid as follows:^{*}
17 50% by petitioners
18 50% by respondents
19 ____% by other:

20 The guardian ad litem is not obligated to begin the investigation until the initial advance
21 has been paid. The advance is not a fixed fee. Parties are responsible for their
22 proportionate share of fees on a monthly basis, once the advance is exhausted.

- 23 The balance of fees/costs owing to the guardian ad litem, once the advance is
24 exhausted, shall be paid as follows:^{*}
25 50% by petitioners
26 50% by respondents
27 ____% by other:

28 The guardian ad litem may be discharged, pursuant to court order, for non-payment of the
29 initial advance, or non-payment of the monthly bill for guardian ad litem fees and/or costs.
30 Interest shall accrue on any unpaid balance at the rate of 12% per annum.

31 **Subject to the court determining apportionment
32 of fees at a later date.*

1 b. In County pay cases, the guardian ad litem fees/costs shall be paid as follows:

2 Spokane County shall pay a maximum of \$____ in fees, at a rate of \$60.00 hour.

3 The petitioner shall contribute \$____.

4 The respondent shall contribute \$____.

5 The total amount awarded shall be at the discretion of the court up to the maximum amount
6 allowed after the guardian ad litem files an itemized statement of time with the court, along
7 with a specific request for fees and a proposed Order. Guardians ad litem who are not
8 volunteers shall provide the parties with an itemized accounting of their time and billing for
9 services each month.

10 In County pay cases the guardian ad litem shall submit their bill to Spokane County for
11 payment within 30 days of the conclusion of the case or the discharge of the guardian ad
12 litem.

13 **3.6 Consent of Children Over Twelve to Investigation**



15 Christopher Simon has reached the age of twelve. Written consent for the guardian
16 ad litem to consult with and obtain information from medical, psychiatric, or other
17 experts who have served the child in the past has has not been given by the
18 child.

19 **3.7 Authorization for Release of Information**

20 Each party's signature hereunder constitutes an authorization for release of information by
21 that party to the agencies listed in paragraph 3.4, above.

22 **3.8 Termination of Appointment**

23 The appointment terminates:

24 Upon entry of the final parenting plan or residential schedule.

25 **3.9 Other**

26 a. After the guardian ad litem's investigation has been completed, the guardian ad
27 litem shall meet with the parties and their counsel. The guardian ad litem shall reveal all
28 sources relied upon and shall present, in general terms, recommendations according to the
29 scope of appointment. The parties, after consulting with their respective attorneys, may
30 attempt to resolve matters at issue. This conference is not a settlement conference or a
31 mediation. If resolution is reached the parties are to place the agreement on the record

immediately in Ex Parte Court. If resolution is not reached at the conference, the guardian ad litem shall draft a written report pursuant to the Domestic Case Scheduling Order.

b. Discovery involving the child:

c. All parties are to comply with Local Rule 94.05(g). Report confidential. The report of the guardian ad litem is a proceeding under RCW Title 26 and shall be treated as confidential by the Clerk of the court, the parties and their counsel unless otherwise ordered by the court. However, attorneys of record may use and disclose such information from the report as is reasonably necessary for their investigation of the case and for trial preparation. Attorneys are prohibited from reproducing or distributing any portion of the written report to any person other than the attorney's client without further order of the court. Parties representing themselves shall be subject to the same use and disclosure limitations as attorneys.

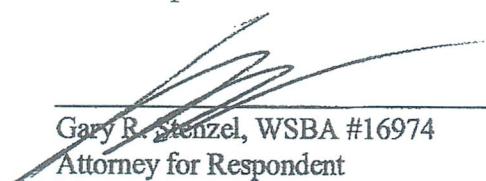
Dated: _____

Judge/Commissioner

Presented by:


Spencer W. Harrington, WSBA #35907
Attorney for Petitioner

Approved for entry:
Notice of presentation waived:


Gary R. Stenzel, WSBA #16974
Attorney for Respondent

Accepted upon approval by the court

Kimberly A. Kamel, WSBA #30041
Guardian ad Litem

Signatures of the Parties:

Wayne Janke, Petitioner

Ronald Simon, Respondent

Doris Strand, Petitioner

Teresa Simon, Respondent

Christopher Simon, Child (See paragraph 3.6)

EXHIBIT 28

FILED
Court of Appeals
Division III
State of Washington
2/21/2020 10:11 AM

COA No. 35974-3

IN THE COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON

RONALD SIMON and TERESA SIMON, Appellants,

v.

WAYNE JANKE and DORIS STRAND, Respondents.

BRIEF OF GUARDIAN AD LITEM

MATTHEW W. DALEY, WSBA # 36711
WITHERSPOON · KELLEY
422 West Riverside Avenue, Suite 1100
Spokane, Washington 99201
Phone: (509) 624-5265

*Counsel for the Guardian Ad Litem, Kimberly A.
Kamel*

I. INTRODUCTION & RELIEF REQUESTED

These consolidated family law proceedings began in 2015. The case began with a "Child in Need of Service" ("CHINS") petition, filed by a minor known as CS. At the time CS was 13 years old – CS is now an adult. CS asked to be removed from his biological parents' custody and placed in the custody of two people who (according to the petition) he had viewed as his true parents since his birth. CS's biological parents – Ron and Teresa Simon – opposed CS' petition.

The other proceeding that is involved in the consolidation was filed on or about March 31, 2015. That proceeding was filed by Wayne Janke and Doris Strand. Mr. Janke and Ms. Strand argued that they were CS's *de facto* parents or, in the alternative, sought custody of CS through a third-party Custody Petition.

The Court appointed Kimberly A. Kamel to serve as CS' guardian ad litem. Ms. Kamel was appointed on or about April 27, 2015. She was not released from service until May 14, 2018. During that time, two trials were held in the consolidated matters, numerous witnesses were interviewed, and countless documentary exhibits were reviewed. During that time, no fewer than 7 attorneys were involved – Mrs. Simon alone was represented at one time or another by 5 different lawyers.

Ultimately, the Spokane County Superior Court held that the Simons were not unfit as parents but that, nonetheless, CS' placement with the Simons would

II. RESTATEMENT OF ISSUE PRESENTED²

With respect to Ms. Kamel, the sole issue before the Court is whether the Trial Court correctly awarded guardian ad litem fees and entered judgment against Mr. and Mrs. Simon (in the amount of \$24,379.21) for their portion of those guardian ad litem fees.

III. STATEMENT OF THE CASE

A. ON APRIL 27, 2015, KIMBERLY A. KAMEL WAS APPOINTED AS GUARDIAN AD LITEM FOR CS.

In or about April 27, 2015, both the Simons, on the one hand, and Mr. Janke and Ms. Strand, on the other hand, brought motions for the appointment of a guardian ad litem to protect CS' interests in the consolidated family law proceedings. CP 1001. On or about April 27, 2015, the Spokane County Superior Court entered an Order granting that motion and appointing Kimberly A. Kamel as CS' guardian ad litem. CP 1001-1006.

² Though it has no bearing upon the Court's review of the Trial Court's award of guardian ad litem fees, brief comment is warranted on the Simons' arguments regarding the declaration of Corrie Amsden. The Simon's Opening Brief, pp. 10-11. Ms. Amsden's "declaration" is rife with multi-layered hearsay, speculation, conjecture, and prejudicial allegations without any factual support. See CP 10-11. The Court should be aware that Ms. Amsden is Ms. Kamel's former legal assistant and that Ms. Amsden appears to have taken (misappropriated) documents from Ms. Kamel's confidential files and disseminated the same in violation of the Trial Court's protective order. The Court should entirely disregard Ms. Amsden's declaration and the Simons' arguments based upon that declaration.

Pursuant to the Court's Order of appointment, Ms. Kamel was tasked with investigating: (i) whether Mr. Janke and Ms. Strand qualified as de facto parents for CS; (ii) whether the case should be regarded as a third party custody case; and (iii) all issues related to the development of a parenting plan for CS. CP 1002. The Order set \$200.00 per hour as Ms. Kamel's fee, and the Order pre-authorized up to \$15,000 in fees – noting that any additional fees would require a further Court Order. CP 1004-1005. Lastly, the Court's appointment Order allocated the guardian ad litem's fees on a 50/50 basis, with Mr. Janke and Ms. Strand paying 50% and the Simons the other 50%. CP 1004. The Order also provide for interest to accrue at 12% on any unpaid fees. CP 1004.

B. FOLLOWING HER APPOINTMENT, MS. KAMEL UNDERTOOK AN INVESTIGATION AND SUBMITTED MULTIPLE REPORTS TO THE COURT.

Between the time of her appointment through August 2015, Ms. Kamel spent over 80 hours investigating the issues and speaking with approximately twenty-four witnesses, reviewing the court file, obtaining medical and mental health information, requesting criminal history information and child protective services information. CP 1068-1121. She further spent numerous hours participating in Court hearings, contacting the minor child's counselor and discussing issues with the parties. CP 1068-1121, 679-681. The disputes between

EXHIBIT 29

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If you disagree with any part of the motion, you must respond to the motion in writing before the hearing and by the deadline for your county. At the hearing, the court will consider *Written witness affidavits or declarations. Oral testimony may Not be allowed. To respond, you must:*

Ex Parte Restrainting Order to Show Cause (PROTSC/ORTSC) - 1 of 3
WPF CL 03.0170 Mandate (06/2008) - CR 65(h); RCW 26.10.115
1517 W. Broadway Avenue
Spokane, WA 99201
Phone: 509-343-3300

1116 W. Broadway, Spokane, WA

10h

Koom/Department:

Time: 8:30 am

Date: April 14, 2015

time and place:

All is ordered that Ronald Simons and Teresa Simon appear and show cause, if any, why the restrictions below should not be continued in full force and effect pending final determination of this action and why the other relief, if any, requested in the motion should not be granted. A hearing has been set for the following date,

1. Show Cause Order

Violation of a Restraint Order in Paragraph 4.1 Below With Actual Knowledge of its Terms is a Criminal Offense Under Chapter 26.50 RCW and Will Subject the Violator to Arrest RCW 26.10.115.

Name of person(s) restrained: Ronald Simon and Teresa Simon.
Name of person(s) protected: Wayne Jake, Doris Strand and Christopher Simon.
See paragraph 4.1.

Restraining Order Summary: [] Does not apply. [x] Restraining Order Summary is set forth below:

<input type="checkbox"/> Ex Parte Restrainting Order <input type="checkbox"/> Order to Show Cause <input type="checkbox"/> (Nonparental Custody) <input type="checkbox"/> (PROTSC/ORTSC)	<p>Wayne Janke and Doris Strand, Petitioners,</p> <p>Ronald Simon and Theresa Simon, Respondents.</p>
<input checked="" type="checkbox"/> Clerk's Action Required <input checked="" type="checkbox"/> Law Enforcement Notification	<p>and</p> <p>14.1</p>

15500185-5

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SUPERIOR COURT OF WASHINGTON, FOR SPOKANE COUNTY

SPOKANE COUNTY CLERK

MAR 31 2015

FILED

Violation of a Restraining Order in Paragraph 4.1 With Actual Notice of its Terms is a Criminal Offense Under Chapter 26.50 RCW and Will Subject the Violator to Arrest. RCW 26.10.115.

Restraint Order

It is Ordered:

IV. Order

The court adopts Paragraphs 2.1, 2.2, and 2.4 of the Motion/Declaration for an Ex Parte Registration Order and for an Order to Show Cause (Form WPF CU 03.0150) as its findings, except as follows:

[X] The child(ren) are not Indian children (rem) as defined by 25 U.S.C. § 1903 and the Indian Child Welfare Act, 25 U.S.C. § 1901, et seq., does not apply to these proceedings.

Indian child status:

Indian Child Welfare Act

III. Findings

A motion for a temporary restraining order without written notice to (name of nonrelenting party) Ronald Simon and Terres Simon or that party's lawyer has been made to this court. The court has consulted the judicial information system, if available, to determine the existence of any information and proceedings that are relevant to the placement of the child.

III. Basis

Fallure to Apper May Result in a Temporary Order Being Enterred by the Court Which Grants the Relief Requested in the Motion Without Further Notice.

1) file your documents with the court; (2) provide a copy of those documents to the judge or
commissioner's staff; (3) serve the other party's attorney with copies of your documents (or have the
other party served if that party does not have an attorney); and (4) complete your filing and service of
documents within the time period required by the local court rules in effect in your county. If you need
more information, you are advised to consult an attorney or a courthouse书记员.

[] **Clerk's Action.** The clerk of the court shall forward a copy of this order, on or before the next judicial day, to (name of appropriate law enforcement agency) Spokane County Sheriff/Police Dept. which shall enter this order into any computer-based criminal intelligence system available in this state used by law enforcement agencies to list outstanding warrants. (A law enforcement information sheet must be completed by the party or the party's attorney and provided with this order before this order will be entered into the law enforcement computer system.)

Service

The requesting party must arrange for service of this order on the restrained party. File the original Return of Service with the clerk and provide a copy to the law enforcement agency listed above.

4.2 Other Restraining Order

- Ronald Simon and Teresa Simon is/are restrained and enjoined from permanently removing the child from the state of Washington.
- The child shall reside with Wayne Janke and Doris Strand until the hearing.
- [] Other:

4.3 Surrender of Deadly Weapons

- [] Does not apply.
- It is ordered that Ronald Simon and Teresa Simon surrender any deadly weapon in his or her immediate possession or control or subject to his or her immediate possession or control to:
 - the Spokane county sheriff.

The court finds that irreparable injury could result if an order is not issued until the time for response has elapsed. (See RCW 26.09.060(2)(b).)

4.4 Expiration Date

This order shall expire on the hearing date set forth above or 14 days from the date of issuance, which ever is sooner, unless otherwise extended by the court.

4.5 Other

Dated: 3/31/2015 at 2:23 a.m./p.m.


Judge/Commissioner

Presented by:


Spencer W. Harrington, WSBA #35907
Attorney for Petitioners

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S4

Ex Parte Restraining Order, Order to Show Cause (TPROTS/C/ORTSC) - 1 of 3
1517 W. Broadaway Avenue
Spokane, WA 99201
Phone: 509-338-8300
WPF CU 03.01.70 Manditory (06/2008) - CR 65(b); RCW 26.10.115

If you disagree with any part of the motion, you must respond to the motion in writing before the hearing and by the deadline for your county. At the hearing, the court will consider *Written sworn affidavits or declarations*. Oral testimony may *Not* be allowed. To respond, you must:

Place: Spokane County Superior Court
Room/Department: 401
Time: 8:30 am
Date: April 17, 2015
Time and place:

It is ordered that Ronald Simon and Teresa Simon appear and show cause, if any, why the restraining below should not be continued in full force and effect pending final determination of this action and why the other relief, if any, requested in the motion should not be granted. A hearing has been set for the following date, April 17, 2015.

I. Show Cause Order

Violation of a Restraining Order in Paragraph 41 Below With Actual Knowledge of its Terms is a Criminal Offense Under Chapter 41 Below With Subject to Arrest RCW 26.10.115.

Name of person(s) restrained: Ronald Simon and Teresa Simon.
Name of person(s) protected: Wayne Janke, Doris Strand and Christopher Simon.
See paragraph 41.

Does not apply. Restraining Order Summary is set forth below:

Restraining Order Summary:

<p>Ex Parte Restraining Order</p> <p>Order to Show Cause (Nonparental Custody)</p> <p>TPROTS/C/ORTSC</p> <p>Chid,</p> <p>Christopher Simon, In re the Custody of</p> <p>Wayne Janke and Doris Strand, Petitioners,</p> <p>Ronald Simon and Teresa Simon, Respondents.</p> <p>[X] Clerk's Action Required [X] Law Enforcement Notification, [X] Does not apply.</p>	<p>14.1</p>
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SUPERIOR COURT OF WASHINGTON, FOR SPOKANE COUNTY

SPOKANE COUNTY CLERK

APR 09 2015

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(1) file your documents with the court; (2) provide a copy of those documents to the judge or commissioner's staff; (3) serve the other party's attorney with copies of your documents (or have the other party served if that party does not have an attorney); and (4) complete your filing and service of documents within the time period required by the local court rules in effect in your county. If you need more information, you are advised to consult an attorney or a courthouse facilitator.

Failure to Appear May Result in a Temporary Order Being Entered by the Court Which Grants the Relief Requested in the Motion Without Further Notice.

II. Basis

A motion for a temporary restraining order without written or oral notice to (name of nonrequesting party) Ronald Simon and Teresa Simon or that party's lawyer has been made to this court. The court has consulted the judicial information system, if available, to determine the existence of any information and proceedings that are relevant to the placement of the child.

III. Findings

Indian Child Welfare Act

Indian child status:

- [X] The child(ren) are not Indian child(ren) as defined by 25 U.S.C § 1903 and the Indian Child Welfare Act, 25 U.S.C. § 1901, et seq., does not apply to these proceedings.

The court adopts paragraphs 2.1, 2.2, and 2.4 of the Motion/Declaration for an Ex Parte Restraining Order and for an Order to Show Cause (Form WPF CU 03.0150) as its findings, except as follows:

IV. Order

It is Ordered:

4.1 Restraining Order

Violation of a Restraining Order in Paragraph 4.1 With Actual Notice of its Terms Is a Criminal Offense Under Chapter 26.50 RCW and Will Subject the Violator to Arrest. RCW 26.10.115.

- [] Does not apply.
[X] Ronald Simon and Teresa Simon is/are restrained and enjoined from disturbing the peace of Wayne Janke, Doris Strand and Christopher Simon.
[X] Ronald Simon and Teresa Simon is/are restrained and enjoined from going onto the grounds of or entering the home, work place or school of the protected person(s) or the day care or school of the following named child: Christopher Simon.
[X] Ronald Simon and Teresa Simon is/are restrained and enjoined from knowingly coming within or knowingly remaining within (distance) 2 blocks of the home, work place, or school of the protected person(s) or the day care or school of this child: Christopher Simon.
[X] Ronald Simon and Teresa Simon is/are restrained and enjoined from molesting, assaulting, harassing, or stalking Wayne Janke, Doris Strand and Christopher Simon.

- Clerk's Action.** The clerk of the court shall forward a copy of this order, on or before the next judicial day, to (name of appropriate law enforcement agency) Spokane County Sheriff/Police Dept. which shall enter this order into any computer-based criminal intelligence system available in this state used by law enforcement agencies to list outstanding warrants. (A law enforcement information sheet must be completed by the party or the party's attorney and provided with this order before this order will be entered into the law enforcement computer system.)

Service

The requesting party must arrange for service of this order on the restrained party. File the original Return of Service with the clerk and provide a copy to the law enforcement agency listed above.

4.2 Other Restraining Order

- Ronald Simon and Teresa Simon is/are restrained and enjoined from permanently removing the child from the state of Washington.

The child shall reside with Wayne Janke and Doris Strand until the hearing.

Other:

4.3 Surrender of Deadly Weapons

- Does not apply.
 It is ordered that Ronald Simon and Teresa Simon surrender any deadly weapon in his or her immediate possession or control or subject to his or her immediate possession or control:

[X] the Spokane county sheriff, or turn any firearms over to a 3rd party.

The court finds that irreparable injury could result if an order is not issued until the time for response has elapsed. (See RCW 26.09.060(2)(b).)

4.4 Expiration Date

This order shall expire on the hearing date set forth above or 14 days from the date of issuance, which ever is sooner, unless otherwise extended by the court. If this matter is set past the 14 days from entry, this order shall remain in full force and effect until the date of the hearing set by the court.

4.5 Other

Dated: 4-3-15 at 1:50 a.m./p.m.

Mandy Alton
Judge/Commissioner *part-time*

Presented by:

~~Spencer W. Harrington, WSBA #35907~~
Attorney for Petitioners

objection noted
JW #A6974

RECEIVED

APR 20 2015

Stenzel Law Office

COPY
ORIGINAL FILED

APR 17 2015

SPOKANE COUNTY CLERK

SUPERIOR COURT OF WASHINGTON, FOR SPOKANE COUNTY

In re the Custody of:

Christopher Simon,

Child,

Wayne Janke and Doris Strand,

Petitioners,

and

Ronald Simon and Teresa Simon,

Respondents.

NO. 15-5-00185-5

**REISSUANCE OF Ex Parte
Restraining Order/Order to Show
Cause
(Nonparental Custody)
(TPROTSC/ORTSC)**

Clerk's Action Required
 Law Enforcement Notification,
¶4.1

Restraining Order Summary:

[] Does not apply. [X] Restraining Order Summary is set forth below:

Name of person(s) restrained: Ronald Simon and Teresa Simon.

Name of person(s) protected: Wayne Janke, Doris Strand and Christopher Simon.

See paragraph 4.1.

Violation of a Restraining Order in Paragraph 4.1 Below With Actual Knowledge of its Terms is a Criminal Offense Under Chapter 26.50 RCW and Will Subject the Violator to Arrest. RCW 26.10.115.

I. Show Cause Order

It is ordered that Ronald Simon and Teresa Simon appear and show cause, if any, why the restraints below should not be continued in full force and effect pending final determination of this action and why the other relief, if any, requested in the motion should not be granted. A hearing has been set for the following date, time and place:

Date: April 24, 2015

Time: 8:30 am

Place: Spokane County Superior Court
1116 W. Broadway, Spokane, WA

Room/Department: 401

If you disagree with any part of the motion, you must respond to the motion in writing before the hearing and by the deadline for your county. At the hearing, the court will consider *Written* sworn affidavits or declarations. Oral testimony may *Not* be allowed. To respond, you must:
(1) file your documents with the court; (2) provide a copy of those documents to the judge or commissioner's staff; (3) serve the other party's attorney with copies of your documents (or have the other party served if that party does not have an attorney); and (4) complete your filing and service of documents within the time period required by the local court rules in effect in your county. If you need more information, you are advised to consult an attorney or a courthouse facilitator.

Failure to Appear May Result in a Temporary Order Being Entered by the Court Which Grants the Relief Requested in the Motion Without Further Notice.

II. Basis

A motion for a temporary restraining order without written or oral notice to (name of nonrequesting party) Ronald Simon and Teresa Simon or that party's lawyer has been made to this court. The court has consulted the judicial information system, if available, to determine the existence of any information and proceedings that are relevant to the placement of the child.

III. Findings

Indian Child Welfare Act

Indian child status:

- The child(ren) are not Indian child(ren) as defined by 25 U.S.C § 1903 and the Indian Child Welfare Act, 25 U.S.C. § 1901, et seq., does not apply to these proceedings.

The court adopts paragraphs 2.1, 2.2, and 2.4 of the Motion/Declaration for an Ex Parte Restraining Order and for an Order to Show Cause (Form WPF CU 03.0150) as its findings, except as follows:

IV. Order

It Is Ordered:

4.1 Restraining Order

Violation of a Restraining Order in Paragraph 4.1 With Actual Notice of its Terms Is a Criminal Offense Under Chapter 26.50 RCW and Will Subject the Violator to Arrest. RCW 26.10.115.

- Does not apply.
 Ronald Simon and Teresa Simon is/are restrained and enjoined from disturbing the peace of Wayne Janke, Doris Strand and Christopher Simon.
 Ronald Simon and Teresa Simon is/are restrained and enjoined from going onto the grounds of or entering the home, work place or school of the protected person(s) or the day care or school of the following named child: Christopher Simon.

1
2 [X] Ronald Simon and Teresa Simon is/are restrained and enjoined from knowingly coming
3 within or knowingly remaining within (distance) 2 blocks of the home, work place, or school
4 of the protected person(s) or the day care or school of this child: Christopher Simon.

[X] Ronald Simon and Teresa Simon is/are restrained and enjoined from molesting, assaulting,
harassing, or stalking Wayne Janke, Doris Strand and Christopher Simon.

[X] **Clerk's Action.** The clerk of the court shall forward a copy of this order, on or before
the next judicial day, to (name of appropriate law enforcement agency) Spokane County
Sheriff/Police Dept. which shall enter this order into any computer-based criminal
intelligence system available in this state used by law enforcement agencies to list
outstanding warrants. (A law enforcement information sheet must be completed
by the party or the party's attorney and provided with this order before this
order will be entered into the law enforcement computer system.)

Service

The requesting party must arrange for service of this order on the restrained party. File the original
Return of Service with the clerk and provide a copy to the law enforcement agency listed above.

4.2 Other Restraining Order

[X] Ronald Simon and Teresa Simon is/are restrained and enjoined from permanently removing
the child from the state of Washington.
[X] The child shall reside with Wayne Janke and Doris Strand until the hearing.

[] Other:

4.3 Surrender of Deadly Weapons

[] Does not apply.
[X] It is ordered that Ronald Simon and Teresa Simon surrender any deadly weapon in his or her
immediate possession or control or subject to his or her immediate possession or control to:
[X] the Spokane county sheriff. Or turn firearms over to a 3rd party.

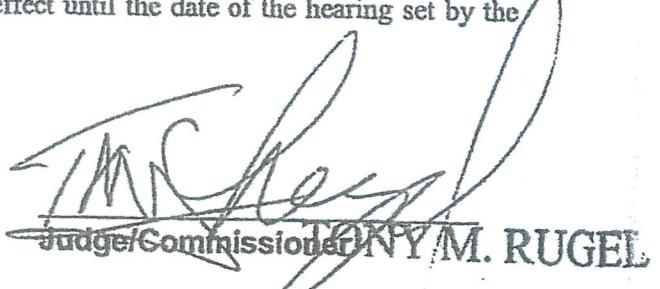
The court finds that irreparable injury could result if an order is not issued until the time for
response has elapsed. (See RCW 26.09.060(2)(b).)

4.4 Expiration Date

This order shall expire on the hearing date set forth above or 14 days from the date of issuance,
which ever is sooner, unless otherwise extended by the court. If this matter is set past the 14 days
from entry, this order shall remain in full force and effect until the date of the hearing set by the
court.

4.5 Other

Dated: 4-17-15 at 9:20 a.m. p.m.


Judge/Commissioner **J.M. RIEGEL**

Harrington Law Office, PLLC
1517 W. Broadway Avenue
Spokane, WA 99201
Phone: 509.347.2200

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2 Presented by:

3 Spencer W. Harrington, WSBA #35907
4 Attorney for Petitioners

Approved by:

Gary R. Stenzel, WSBA # 16974
5 Attorney for Respondents 4/18/23