**COMPLETE EMERGENCY CIR FILING PACKET**

**Snohomish County Superior Court – Case No. 25-2-04968-31**  
**Ready to Print and File Today - July 23, 2025**

**DOCUMENT 1: COVER LETTER**

William Orley Miller Jr.  
1024 S Machias Rd  
Snohomish, WA 98290  
(206) 226-2085  
wmiller@muddmonkiesinc.com  
  
July 23, 2025  
  
Clerk of the Court  
Snohomish County Superior Court  
3000 Rockefeller Ave  
Everett, WA 98201  
  
Re: Emergency Ex-Parte Motion – Case No. 25-2-04968-31  
  
Dear Clerk:  
  
Please file the enclosed emergency ex-parte motion, declaration, and exhibits on an urgent basis. This motion requests temporary orders and scheduling of a Committed Intimate Relationship (CIR) determination hearing. Due to my life-threatening medical condition and ongoing financial harm, I respectfully request same-day presentation to the duty judge.  
  
Enclosed documents:  
1. Motion for Temporary Orders and CIR Determination Hearing  
2. Sworn Declaration of William Orley Miller Jr.  
3. Exhibit Index  
4. Exhibits A, F, L (separately tabbed)  
  
Respectfully submitted,  
  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
William Orley Miller Jr. (Pro Se)

**DOCUMENT 2: MOTION FOR TEMPORARY ORDERS AND CIR DETERMINATION HEARING**

IN THE SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY  
  
WILLIAM ORLEY MILLER JR., ) No. 25-2-04968-31  
 Petitioner, )  
 ) MOTION FOR TEMPORARY ORDERS  
v. ) AND COMMITTED INTIMATE  
 ) RELATIONSHIP DETERMINATION  
CANDI LYNN BRIGHTWELL, ) HEARING  
 Respondent. )  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)  
  
TO THE HONORABLE COURT:  
  
Petitioner William Orley Miller Jr., appearing pro se, respectfully moves this Court for:  
  
I. TEMPORARY EMERGENCY ORDERS  
  
1. TEMPORARY EXCLUSIVE USE of the residence at 1024 S Machias Rd, Snohomish, WA 98290, due to Petitioner's life-threatening medical conditions requiring stable housing;  
  
2. TEMPORARY RESTRAINING ORDER prohibiting Respondent from selling, transferring, disposing, encumbering, hiding, or wasting ANY shared assets, property, belongings, business equipment, household items, records, animals, or personal effects of ANY value, including through online sales or third-party transactions, pending further court order;  
  
3. TEMPORARY RESTORATION of Petitioner's access to business assets, equipment, and facilities necessary for continuing operations of Mudd Monkies Inc.;  
  
4. TEMPORARY INJUNCTION against harassment, interference with business operations, and making false reports to authorities;  
  
5. PRESERVATION ORDER requiring both parties to maintain and safeguard all shared property, documents, digital files, accounts, and financial resources pending final determination;  
  
6. ORDER requiring Respondent to immediately cease all online sales of shared property and provide full accounting of any items sold and proceeds received.  
  
II. SCHEDULING OF CIR DETERMINATION HEARING  
  
7. ACCEPT JURISDICTION over this matter for determination of Committed Intimate Relationship (CIR) status under Connell v. Francisco, 127 Wn.2d 339 (1995);  
  
8. SCHEDULE HEARING for full adjudication of CIR based on the five-factor test: cohabitation, duration, purpose, pooling of resources, and intent;  
  
9. GRANT LEAVE to supplement the record with additional CIR evidence and documentation as it becomes available.  
  
III. CONTEMPT ALLEGATIONS  
  
10. FIND RESPONDENT IN CONTEMPT for unauthorized online sale of jointly-owned business and personal property without Petitioner's knowledge or consent, in violation of property rights and court expectations regarding asset preservation;  
  
11. ORDER full accounting of all items sold online and funds received from such unauthorized sales.  
  
IV. EMERGENCY BASIS  
  
This motion is based upon the following emergency circumstances:  
  
A. MEDICAL EMERGENCY: Petitioner suffers from a carotid aneurysm and PTSD requiring stable residence for health and safety (Exhibit A - Medical Records).  
  
B. FINANCIAL HARM: Ongoing exclusion from residence and business has resulted in substantial business losses with continuing daily harm from denied access to equipment and facilities.  
  
C. ASSET DISSIPATION: Respondent has been selling shared property online without consent, creating irreparable harm to the joint estate and violating asset preservation principles.  
  
D. PRIMA FACIE CIR CASE: Evidence establishes all five Connell factors:  
 - Cohabitation: Continuous shared residence at 1024 S Machias Rd since 2018  
 - Duration: 7+ year relationship with engagement in 2020 (Respondent still possesses engagement ring)  
 - Purpose: Joint business operations (Mudd Monkies Inc.), shared family goals, marital-like partnership  
 - Pooling: 5+ years of comingled finances documented in bank statements (Exhibit L)  
 - Intent: Engagement in 2020, ongoing reconciliation attempts through 2025  
  
V. SUPPORTING EVIDENCE  
  
The attached exhibits demonstrate:  
- Exhibit A: Medical documentation of life-threatening aneurysm and PTSD  
- Exhibit F: Communications with Respondent's attorney (Nazaria email) showing interference  
- Exhibit L: Bank statements from 2019-2024 showing extensive financial comingling  
  
VI. LEGAL AUTHORITY  
  
This motion is filed pursuant to:  
- CR 65 (Temporary Restraining Orders and Preliminary Injunctions)  
- RCW 26.09.060 (Temporary Family Law Orders)  
- RCW 26.09.194 (Committed Intimate Relationships)  
- RCW 7.21.010 (Contempt of Court)  
- Connell v. Francisco, 127 Wn.2d 339 (1995)  
- In re Marriage of Lindsey, 101 Wn.2d 299 (1984)  
  
VII. PRAYER FOR RELIEF  
  
WHEREFORE, Petitioner respectfully requests that this Court:  
1. Grant all temporary emergency orders requested above;  
2. Schedule a hearing for full CIR determination within 30 days;  
3. Preserve all shared assets and property pending final adjudication;  
4. Find Respondent in contempt for unauthorized online sales of joint property;  
5. Order immediate cessation of all asset sales and full accounting of proceeds;  
6. Grant leave to supplement the evidentiary record;  
7. Award such other relief as the Court deems just and proper.  
  
RESPECTFULLY SUBMITTED this 23rd day of July, 2025.  
  
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William Orley Miller Jr., Pro Se  
1024 S Machias Rd  
Snohomish, WA 98290  
(206) 226-2085  
wmiller@muddmonkiesinc.com

**DOCUMENT 3: SWORN DECLARATION OF WILLIAM ORLEY MILLER JR.**

IN THE SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY  
  
WILLIAM ORLEY MILLER JR., ) Case No. 25-2-04968-31  
 Petitioner, )  
 ) DECLARATION OF  
v. ) WILLIAM ORLEY MILLER JR.  
 ) IN SUPPORT OF MOTION FOR  
CANDI LYNN BRIGHTWELL, ) TEMPORARY ORDERS  
 Respondent. )  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)  
  
I, William Orley Miller Jr., declare under penalty of perjury as follows:  
  
1. I am the Petitioner in this matter and am competent to testify to the matters stated herein.  
  
2. MEDICAL EMERGENCY: I suffer from a diagnosed carotid aneurysm and PTSD. My medical records (Exhibit A) confirm that displacement from stable housing poses a life-threatening risk to my health. I require immediate access to my residence at 1024 S Machias Rd for medical safety and recovery.  
  
3. COHABITATION: Since 2018, I have continuously resided with Respondent Candi Lynn Brightwell at 1024 S Machias Rd, Snohomish, WA 98290. We maintained a shared household, joint responsibilities, and intimate partnership throughout this period.  
  
4. ENGAGEMENT: Respondent and I became engaged in or around 2020. She still possesses the engagement ring. This engagement demonstrates our mutual intent to form a permanent, marital-like relationship.  
  
5. FINANCIAL COMINGLING: Our finances have been thoroughly intertwined for over five years. The attached bank statements (Exhibit L) covering 2019-2024 document extensive pooling of resources, joint expenses, shared financial decisions, and mutual financial responsibility consistent with a committed intimate relationship.  
  
6. JOINT BUSINESS: We operated Mudd Monkies Inc. together as business partners, sharing equipment, facilities, income, and business decisions. My exclusion from the business premises has resulted in substantial ongoing financial harm to our joint enterprise.  
  
7. SHARED ASSETS: All property at 1024 S Machias Rd, including household items, business equipment, tools, animals, and personal belongings, has been historically shared between us. Respondent has recently begun selling these shared assets online without my consent, causing irreparable harm.  
  
8. UNAUTHORIZED ONLINE SALES: I have recently discovered that Respondent has been listing and selling our jointly-owned business and personal property on online marketplaces without my knowledge or consent. These items were acquired and used as part of our shared household and joint business operations.  
  
9. DURATION: Our relationship has continued for over seven years, far exceeding the duration typically required for CIR recognition under Washington law.  
  
10. PURPOSE: Our relationship demonstrated all characteristics of a marital-like partnership, including shared residence, joint business operations, financial interdependence, family planning, and long-term commitment evidenced by our engagement.  
  
11. INTENT: Despite recent difficulties, our relationship showed mutual intent to maintain a permanent partnership. Our engagement, joint business ventures, shared financial responsibilities, and ongoing reconciliation attempts demonstrate this intent.  
  
12. ATTORNEY COMMUNICATIONS: Communications with Respondent's attorney (Exhibit F - Nazaria email) document interference with my rights and access to shared property.  
  
13. EMERGENCY RELIEF NEEDED: Without immediate temporary orders, I face:  
 - Life-threatening health risks due to housing instability  
 - Continuing business losses from denied property access  
 - Irreparable loss of shared assets through unauthorized online sales  
 - Inability to access necessary business equipment and records  
  
14. I respectfully request this Court grant temporary emergency relief, find Respondent in contempt for unauthorized asset sales, and schedule a hearing for full CIR determination based on the substantial evidence of our committed intimate relationship under all five Connell factors.  
  
I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.  
  
EXECUTED this 23rd day of July, 2025, at Snohomish, Washington.  
  
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William Orley Miller Jr.

**DOCUMENT 4: EXHIBIT INDEX**

IN THE SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY  
  
WILLIAM ORLEY MILLER JR., ) Case No. 25-2-04968-31  
 Petitioner, )  
 ) EXHIBIT INDEX  
v. )  
 )  
CANDI LYNN BRIGHTWELL, )  
 Respondent. )  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)  
  
The following exhibits are submitted in support of Petitioner's Motion for Temporary Orders and CIR Determination Hearing:  
  
EXHIBIT A: Medical Records and Documentation  
 - Carotid aneurysm diagnosis and treatment records  
 - PTSD documentation and treatment history  
 - Medical opinions regarding housing stability requirements  
  
EXHIBIT F: Attorney Communications  
 - Nazaria email correspondence  
 - Documentation of legal counsel interference with property rights  
  
EXHIBIT L: Bank Statements Demonstrating Financial Comingling (2019-2024)  
 - Personal bank statements covering 2019-2024  
 - Evidence of pooled resources and shared financial responsibilities  
 - Joint expenses and financial interdependence documentation  
  
NOTE: Additional exhibits supporting the five-factor CIR analysis will be filed as supplementals as they become available, including property records, additional relationship documentation, and further evidence of cohabitation, duration, purpose, pooling of resources, and intent.  
  
DATED this 23rd day of July, 2025.  
  
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William Orley Miller Jr., Pro Se

**FINAL FILING CHECKLIST**

**BEFORE LEAVING FOR COURT:**

✅ **PRINT** all 4 documents above  
✅ **SIGN** Cover Letter, Motion, Declaration, and Exhibit Index where indicated  
✅ **DATE** all documents July 23, 2025  
✅ **ATTACH** your physical Exhibits A, F, L (separately tabbed)  
✅ **PREPARE** original + 3 copies of complete packet  
✅ **BRING** existing fee waiver order if available

**AT THE COURTHOUSE:**  
✅ **FILE** at Clerk's counter (3000 Rockefeller Ave, Everett, WA)  
✅ **REQUEST** same-day ex-parte presentation to duty judge  
✅ **KEEP** your stamped copy for records  
✅ **PROVIDE** self-addressed stamped envelope for return orders

**KEY POINTS TO EMPHASIZE TO JUDGE:**

* Life-threatening medical emergency requiring stable housing
* 7+ years of documented relationship with financial comingling
* Ongoing unauthorized sale of shared assets creating irreparable harm
* Strong prima facie case for CIR under all five Connell factors

**YOUR COMPLETE FILING PACKET IS NOW READY - GO FILE TODAY!**