

**Draft: Combined Discovery Packet and Master Index (Snohomish County Superior Court)**

Below is a structured, single “Discovery Packet” document that compiles and organizes all relevant case documents found in the file set, arranged to follow Snohomish County Superior Court practices for civil protection order/family law matters. It includes a master index, Bates-label scheme, defined discovery requests, and an attachments section referencing each item so it can be filed/served as one cohesive packet. Where useful, I embedded short, numbered citations to the underlying items so a court or opposing counsel can locate them quickly.

Note: Replace bracketed placeholders like “[BATES-0001]” and “[Exhibit A]” with final pagination once exported. File names and content summaries tie to the identified items below.

**Caption**

Superior Court of Washington, County of Snohomish

In re the Relationship of  
William Orley Miller Jr., Petitioner,  
and  
Candi Lynn Brightwell, Respondent.

* Family law matter with associated protection order proceedings.
* Related Case Nos.: 25-2-04968-31; 25-2-03361-31; 25-2-03181-31.[[1]](#fn1)[[2]](#fn2)[[3]](#fn3)

Title: Petitioner’s Consolidated Discovery Packet, Master Index, and Initial Disclosures

**Section 1 — Master Index of Included Materials**

A. Core Pleadings and Court Orders

* Case Information Cover Sheet (Snohomish Superior Court) — identifies nature of action, related cases, and domestic violence basis.[[2]](#fn2)
* Motion for Temporary Orders and Proposed Temporary Order — requests exclusive use, support, restraints, animals, and evidence limitations, with supporting declaration.[[2]](#fn2)
* Ex Parte Motion for Temporary Orders; Motion for OSC Re: Contempt; Cover letters for urgent filing — consolidates urgent relief and contempt bases tied to alleged violations of reissued TPO.[[4]](#fn4)
* Temporary Protection Order and Hearing Notice (PO 030) — terms including no-contact, stay-away, transfer of assets restraint (Section K), and animals/other terms.[[5]](#fn5)
* Reissuance of Temporary Protection Order and Notice of Hearing (ORRTPO) — extends TPO, calendars date, and contains clerk/law enforcement actions.[[6]](#fn6)
* Denial Orders and Hearing-Setting Orders in 25-2-03361-31 — denial without full order pending hearing, service instructions, Zoom details; sets hearing and denies temporary pending hearing.[[1]](#fn1)
* Respondent’s Response to Petition for Protection Order in 25-2-03361-31 — point-by-point responses, affirmative defenses, and related facts; references anti-harassment case and communications.[[3]](#fn3)

B. Declarations and Factual Support

* Declaration of William Orley Miller Jr. in Support of Motions — details CIR/meretricious relationship, domestic violence/coercive control allegations, medical vulnerability, business interference, Aflac policy timeline, animals, and property issues.[[7]](#fn7)[[2]](#fn2)
* Exhibits A–I to Contempt/TPO issues — texts, emails with counsel, reissuance order, narrative of alleged violations (denied access, disposal, tools, pet custody), and harm calculations.[[8]](#fn8)[[6]](#fn6)

C. Filing Covers and Exhibit Cover Sheets

* Submitted-by coversheet for exhibit attachment and clerk processing.[[4]](#fn4)

D. Standardized Court Form

* PO 030 form as issued content (with filled data and terms).[[5]](#fn5)

E. Additional Orders/Notices

* Order Setting Hearing with attendance guidance, service directions, and Zoom logistics.[[1]](#fn1)

Index note: Each document is incorporated by reference, to be Bates-stamped sequentially and cross-referenced in the fact timeline and requests below.

**Section 2 — Parties’ Initial Disclosures (CR 26(a) adapted for Family Law/PO context)**

Without waiving objections, Petitioner discloses:

* Individuals likely to have discoverable information:
  + Parties: William Orley Miller Jr.; Candi Lynn Brightwell. Subject areas include relationship history, property access/denial, communications, incidents July 2024–June 2025, pets, and compliance with TPO.[[7]](#fn7)[[6]](#fn6)[[8]](#fn8)[[3]](#fn3)[[2]](#fn2)[[4]](#fn4)
  + Counsel for Respondent (Van Siclen, Stocks & Firkins) — communications regarding access/animals and purported conditions.[[6]](#fn6)[[8]](#fn8)
  + Law enforcement and Court Administration (Snohomish County Sheriff; courtroom staff) — service, civil standbys, reissuance entries, and calendar.[[5]](#fn5)[[6]](#fn6)[[1]](#fn1)
  + Medical/EMS: Snohomish Regional Fire & Rescue; hospital providers related to Sept 2024 and April 13, 2025 events (ICU/life support).[[3]](#fn3)[[2]](#fn2)[[4]](#fn4)
  + Aflac representatives regarding group policy status, effective dates, claims No. GRP-6320164.[[7]](#fn7)[[4]](#fn4)
* Categories of documents/data:
  + Court orders and filings in related case numbers (TPO, reissuance, denial orders, hearing orders).[[2]](#fn2)[[4]](#fn4)[[6]](#fn6)[[3]](#fn3)[[1]](#fn1)[[5]](#fn5)
  + Communications: texts and emails re access, codes/keys, animals, and counsel directives.[[8]](#fn8)[[6]](#fn6)
  + Property and business records: inventory, tools, shop stock, alleged disposal items; proof of business disruption and revenue impacts.[[4]](#fn4)[[8]](#fn8)[[2]](#fn2)
  + Medical and EMS records tied to April 13, 2025 and other dates.[[3]](#fn3)[[2]](#fn2)[[4]](#fn4)
  + Insurance (Aflac) account snapshots, policy status notices, portal access logs/credentials communications, and claim filings/responses.[[7]](#fn7)[[4]](#fn4)
* Damages computation:
  + Business loss assertion of $750/day tied to denial of access from Sept 13, 2024 (or a subset), subject to records/mitigation and court determination.[[8]](#fn8)[[4]](#fn4)
* Insurance agreements:
  + Aflac group accident/critical illness policy recorded as active/lapsed dispute; effective dates in question; claim GRP-6320164; sought as part of discovery.[[4]](#fn4)[[7]](#fn7)

**Section 3 — Factual Timeline (Concise)**

* July 2024: Incident leading to arrest and subsequent disputes over property and communications.[[6]](#fn6)[[3]](#fn3)[[7]](#fn7)
* Nov 6, 2024: Arrest incident; contested accounts of lying/property; animal and property disputes arise.[[6]](#fn6)[[3]](#fn3)[[7]](#fn7)
* Dec 27, 2024: Incident forming DV case background; contested details and later filings.[[8]](#fn8)[[3]](#fn3)[[7]](#fn7)
* Early Mar–Apr 2025: Garage access dispute; April 5–6 police calls; April 11 anti-harassment filing; April 13 medical crisis with EMS and ICU.[[2]](#fn2)[[3]](#fn3)[[4]](#fn4)[[6]](#fn6)[[8]](#fn8)
* May 30, 2025: TPO issued for Miller v. Brightwell; terms include Section K “Do not transfer jointly owned assets” and pet custody language.[[5]](#fn5)[[6]](#fn6)
* June 6–13, 2025: Miller’s compliance demands; counsel responses restricting access; reissuance June 10; civil standby June 14.[[6]](#fn6)[[8]](#fn8)
* June 16–27, 2025: Motions for temporary orders and contempt; exhibits and cover filings; ex parte submissions.[[2]](#fn2)[[4]](#fn4)[[8]](#fn8)[[6]](#fn6)
* April–June 2025: Aflac policy coverage/termination dispute and claim filing GRP-6320164.[[7]](#fn7)[[4]](#fn4)

All dates, where precise, derive from filed documents and embedded dates therein.[[1]](#fn1)[[3]](#fn3)[[5]](#fn5)[[4]](#fn4)[[8]](#fn8)[[2]](#fn2)[[6]](#fn6)

**Section 4 — Discovery Requests (to Respondent)**

Instructions: Produce within 30 days consistent with CR 26–37 and Snohomish County local practice. Electronically stored information should be produced in native or reasonably usable format with metadata for communications and logs.

A. Requests for Production

1. All communications (texts, emails, messaging apps) between Respondent and Petitioner from July 1, 2024 to present concerning residence access, keys/codes, tools, animals, property removals, remodeling, and civil standbys.[[3]](#fn3)[[8]](#fn8)[[6]](#fn6)
2. All communications between Respondent/counsel and any third party (including law enforcement) about Petitioner’s access rights, animals, and property from May 30, 2025 to present.[[8]](#fn8)[[6]](#fn6)
3. All documents, photos, video, security camera exports, and logs relating to modifications, disposal, donation, or sale of items alleged to be Petitioner’s or business property since Sept 13, 2024, including dumpster contents and remodeling records (invoices, receipts, before/after photos).[[8]](#fn8)
4. All pet veterinary records, receipts, and communications relating to Lily, Rayne, and Macy from Jan 1, 2024 to present; and any communications disputing custody/possession or transfer logistics following May 30, 2025.[[5]](#fn5)[[6]](#fn6)[[8]](#fn8)
5. All documents and communications with Aflac or employer plan administrators about the group policy status, coverage dates, enrollments/terminations, portability/continuation options involving Petitioner from Jan 1, 2025 to July 1, 2025, including portal logs/credentials exchanged.[[4]](#fn4)[[7]](#fn7)
6. All documents concerning any alleged unauthorized access, surveillance, or recording by Petitioner, including device lists, camera placements, network logs, and complaints/reports.[[3]](#fn3)[[6]](#fn6)[[8]](#fn8)
7. All documents supporting contentions that Petitioner caused damage to the residence or property, including photos, repair invoices, estimates, police reports, and insurance claims.[[8]](#fn8)
8. All law enforcement reports and civil standby documentation for events at 1024 S Machias Rd between July 1, 2024 and July 1, 2025.[[6]](#fn6)[[8]](#fn8)
9. All financial records evidencing payments made for mortgage, utilities, property taxes, insurance, and any asserted financial support or reimbursements, from July 1, 2024 to present.[[2]](#fn2)[[4]](#fn4)[[8]](#fn8)
10. All documents reflecting Respondent’s positions communicated by counsel on or about June 6–13, 2025 regarding access restrictions and pet custody, including email threads and attachments.[[6]](#fn6)[[8]](#fn8)

B. Interrogatories

1. Identify each instance since Sept 13, 2024 when Petitioner sought access to the residence, shop, tools, or animals; state Respondent’s response, date/time, persons present, and reasons for denial/conditions imposed.[[6]](#fn6)[[8]](#fn8)
2. Describe with specificity any remodeling, alterations, or property changes to 1024 S Machias Rd since Sept 13, 2024, including who performed the work, scope, materials used, and funding source.[[8]](#fn8)
3. Identify all items of Petitioner’s and of Mudd Monkies Inc. property Respondent contends were disposed of, moved, or used since Sept 13, 2024, the date/action, current location, and basis for action.[[8]](#fn8)
4. State Respondent’s knowledge concerning the May 30, 2025 TPO terms about assets and animals and explain steps taken to comply between May 30 and June 14, 2025.[[5]](#fn5)[[6]](#fn6)[[8]](#fn8)
5. Describe Respondent’s understanding of the Aflac policy status, dates, and Petitioner’s enrollment/termination events in Q1–Q2 2025 and identify each person at Aflac/employer with whom Respondent communicated.[[7]](#fn7)[[4]](#fn4)
6. Identify each law enforcement or court interaction involving the parties from July 1, 2024 to July 1, 2025 and summarize Respondent’s account of each.[[1]](#fn1)[[4]](#fn4)[[3]](#fn3)[[2]](#fn2)[[6]](#fn6)[[8]](#fn8)

C. Requests for Admission

1. Admit that on and after May 30, 2025, Respondent was aware of PO 030 terms restraining transfer of jointly owned assets (Section K).[[5]](#fn5)
2. Admit that on or about June 10–14, 2025, Respondent or Respondent’s counsel refused Petitioner general entry to the residence beyond limited civil standby.[[6]](#fn6)[[8]](#fn8)
3. Admit that Petitioner was awarded temporary custody of pets identified in the TPO and reissuance order.[[5]](#fn5)[[6]](#fn6)
4. Admit that one or more of Petitioner’s or Mudd Monkies Inc. items were thrown into a dumpster or otherwise removed/disposed after May 30, 2025.[[8]](#fn8)
5. Admit that Respondent performed or directed remodeling/alteration work at the residence after Sept 13, 2024 without Petitioner’s consent.[[8]](#fn8)
6. Admit that Respondent had communications with Aflac or plan administrators after April 1, 2025 regarding policy status affecting Petitioner.[[4]](#fn4)[[7]](#fn7)

**Section 5 — Protective Order Proposal (if needed)**

Given sensitive medical/financial data and account credentials, Petitioner proposes a stipulated protective order limiting use and disclosure of:

* Medical records and EMS reports.
* Insurance credentials/logs.
* Account/device logs or camera placements.

Scope: Use only for this litigation, with return/destruction at conclusion.

**Section 6 — Production From Petitioner (available for inspection/copy)**

* Copies of TPO and Reissuance orders; hearing orders and denial orders.[[1]](#fn1)[[5]](#fn5)[[6]](#fn6)
* Petitioner’s motions, declarations, and exhibits A–I, including demand letters and counsel email responses.[[2]](#fn2)[[4]](#fn4)[[6]](#fn6)[[8]](#fn8)
* Available texts/emails seeking access/animals and referring to keys/codes windows.[[6]](#fn6)[[8]](#fn8)
* EMS/hospital discharge records concerning April 13, 2025 (to the extent in possession; others to be subpoenaed).[[3]](#fn3)[[4]](#fn4)[[2]](#fn2)
* Aflac claim submission confirmations and communications referencing GRP-6320164 and policy date disputes.[[7]](#fn7)[[4]](#fn4)

**Section 7 — Subpoena/Third-Party Discovery Plan**

* Snohomish Regional Fire & Rescue: run sheets, call audio, and records for April 13, 2025.[[4]](#fn4)[[3]](#fn3)[[2]](#fn2)
* Hospital(s) treating Petitioner in Sept 2024 and April 2025: admissions, ICU, imaging, surgery, discharge instructions.[[3]](#fn3)[[2]](#fn2)[[4]](#fn4)
* Aflac and employer plan admin: policy certificates, enrollment/termination logs, notices, claims file, and portal activity logs for Q1–Q2 2025.[[7]](#fn7)[[4]](#fn4)
* Snohomish County Sheriff: civil standby records and incident reports tied to property and animal retrieval dates.[[6]](#fn6)[[8]](#fn8)

**Section 8 — Compliance Notes for Snohomish County SOP**

* Use court-approved forms for protection orders and service; ensure WACIC/NCIC entries via clerk actions are acknowledged.[[1]](#fn1)[[5]](#fn5)[[6]](#fn6)
* Remote appearance and interpreter/ADA notices preserved; include the Zoom IDs/passwords only as contained in issued orders when attaching copies.[[1]](#fn1)[[5]](#fn5)
* File as one PDF with bookmarks: “Index,” “Pleadings,” “Orders,” “Declarations,” “Exhibits,” “Discovery Requests,” and “Initial Disclosures”; apply Bates labels in footer.

**Section 9 — Exhibits List (to attach behind this packet)**

* Exhibit 1: Case Information Cover Sheet, Motion for Temporary Orders, Declaration, and Proposed Order (filed June 16, 2025)[[2]](#fn2)
* Exhibit 2: PO 030 Temporary Protection Order and Hearing Notice (May 30, 2025, as issued content)[[5]](#fn5)
* Exhibit 3: Reissuance of Temporary Protection Order and Notice of Hearing (June 10–11, 2025)[[6]](#fn6)
* Exhibit 4: Denial Order(s) and Order Setting Hearing (25-2-03361-31)[[1]](#fn1)
* Exhibit 5: Ex Parte Motion for Temporary Orders; Motion for OSC Re: Contempt; filing coversheets (June 24–27, 2025)[[4]](#fn4)
* Exhibit 6: Declaration set and Aflac policy analysis narrative (policy dates, claim GRP-6320164)[[7]](#fn7)[[4]](#fn4)
* Exhibit 7: Exhibits A–E (texts/correspondence excerpts and narrative)[[6]](#fn6)
* Exhibit 8: Exhibits F–I (obstruction allegations, counsel email quotes, harm assertions)[[8]](#fn8)
* Exhibit 9: Respondent’s Response in 25-2-03361-31 (Google Docs export)[[3]](#fn3)

Each Exhibit is incorporated as produced; authenticity and completeness reserved pending third-party subpoena returns.

**Signature**

Dated: \_\_\_\_\_\_\_\_\_\_\_\_, 2025

William Orley Miller Jr.  
Petitioner, Pro Se

Service: Via e-file and email per service agreement, and by mail if required under local rules.

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Implementation notes for filing/serving:

* Combine the sections above into a single PDF, followed by the exhibits in the order listed, all Bates-stamped.
* Use the clerk’s “Submitted By” exhibit coversheet as the first page of the exhibits section if preferred by the assigned department.[[4]](#fn4)
* Where the PO 030 and reissuance orders include Zoom IDs and warnings, include the full issued pages without alteration.[[5]](#fn5)[[6]](#fn6)
* Keep the denial/hearing orders intact to preserve service and appearance instructions, which can be important for the record.[[1]](#fn1)

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1. candi-denied-order.pdf

1. 67BDAA8C605C8A0C99A8F816A7451885\_299292.pdf

1. respone-to-canis-prder-.-Google-Docs.pdf

1. june-27-temp-orders-attempt.pdf

1. PO\_030\_Temporary\_Protection\_Order\_AH-DV-STK\_1.24.pdf

1. exhibits-contempt-dvpo-A-E-cond.pdf

1. include-any-domestic-violence-rcw-that-coulkd-be.pdf

1. exhibits-contempt-dvpo-f-I-cond.pdf

1. exhibits-contempt-dvpo-J-O.pdf

1. exhibits-contempt-dvpo-J-O.pdf

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1. <https://keep.google.com/u/1/>