COURT PREPARATION GUIDE (MOCK DRAFT EXAMPLE)

For William Orley Miller Jr. - Snohomish County Superior Court

Hearing Date: June 10, 2025

*(This guide combines your prepared statement for presentation with anticipated arguments from opposing counsel and strong, factual counter-points for your reference. It is NOT legal advice or a script for direct testimony/answers. Court proceedings are dynamic. You MUST consult with a licensed attorney for specific legal advice and courtroom representation.)*

**PART 1: PETITIONER WILLIAM ORLEY MILLER JR.'S BRIEF COURT STATEMENT (To be read aloud to the Court)**

Your Honor, I am William Orley Miller Jr., the Petitioner in Case No. 25-2-03181-31. I respectfully ask this court to **renew my Anti-Harassment Protection Order** against Respondent Candi Lynn Brightwell and to **order specific access to my home, belongings, and animals.**

I am a combat veteran with PTSD, and I have a diagnosed carotid artery dissection, a life-threatening condition. These circumstances classify me as a vulnerable adult under Washington law.

My prior Anti-Harassment Order lapsed because I was on life support and physically unable to attend the renewal hearing on April 22, 2025. My absence was not a choice; it was a severe medical emergency directly caused by Respondent's harassment.

Despite the lapse of my prior order, and even after the court granted a Temporary Protection Order in my favor on May 30, 2025 (Case No. 25-2-04968-31), Respondent's harassment, control, and unlawful actions against me have persisted and escalated.

**Specifically, on May 29, 2025, Respondent unlawfully prevented my entry to my shared property at 1024 S Machias Rd.** This violates my rights as a co-owner in a Committed Intimate Relationship. Respondent has also **unlawfully withheld my essential personal belongings, business tools, and animals** (Lilly, Rayne, and Macy), including items from my private room, effectively evicting me and crippling my livelihood.

Her recent attempt, through her attorney, to force all communication through their office, despite my TPO allowing direct text regarding joint property, is a further act of coercive control and obstruction. This pattern of behavior, which includes her **exploitation of my PTSD and vulnerability during medical crises**, using our daughter as an intermediary, surveillance, false reports, and physical aggression, is a severe threat to my life and recovery.

Your Honor, this ongoing harassment poses a direct threat to my life and recovery. I urgently need this Protection Order renewed, and I need the court to order that I receive **keys and codes to my property, unobstructed access to my home and woodshop to conduct my business, access to all my personal items, and access to my animals, as I have custody.** I also request the ability to reside at the property until the legal property division process is complete.

Thank you, Your Honor.

**PART 2: ANTICIPATED ARGUMENTS FROM OPPOSING COUNSEL & YOUR STRONG, FACTUAL COUNTER-ARGUMENTS (For Preparation)**

*(This section outlines potential arguments Candi or her attorney might make against you, and provides the key factual points and legal principles you should be prepared to state in response. Focus on delivering these facts clearly and concisely.)*

**I. ARGUMENTS AGAINST YOUR PROTECTION ORDER RENEWAL (Case No. 25-2-03181-31)**

1. **Opposing Argument: "Mr. Miller's prior order lapsed, indicating he no longer needed protection or his claims were unsubstantiated."**
   * **Your Counter-Argument:** "Your Honor, the prior order lapsed solely because I was on life support due to a severe medical crisis on April 13, 2025, directly caused by Respondent's harassment. I was physically unable to attend the renewal hearing. My absence was not willful; it was a medical emergency that threatened my life. Medical reports (Exhibit 8, 9, 10) substantiate this. The harassment did not cease; it directly led to my hospitalization."
2. **Opposing Argument: "Mr. Miller is exaggerating or fabricating claims of harassment/coercive control."**
   * **Your Counter-Argument:** "Your Honor, my claims are not exaggerated; they are supported by a consistent pattern of Respondent's conduct. This includes repeated unlawful denials of property access (May 29, 2025, and ongoing), documented privacy violations through hacking and surveillance, false reports to police, physical aggression, and her ongoing exploitation of my known PTSD and medical vulnerabilities. I have specific evidence for each incident."
3. **Opposing Argument: "Mr. Miller's health issues are unrelated to Respondent's conduct."**
   * **Your Counter-Argument:** "Your Honor, medical evidence (Exhibits 8, 9, 10) confirms my PTSD and a life-threatening carotid artery dissection. My doctors confirm that stress and hostile interactions directly exacerbate my condition. Respondent's pattern of harassment, control, and exploitation of my vulnerabilities directly contributed to my medical crises and continued inability to recover safely."
4. **Opposing Argument: "Mr. Miller is merely seeking property access under the guise of a protection order."**
   * **Your Counter-Argument:** "Your Honor, my property rights are fundamental, but Respondent's actions of denying access, unlawfully withholding my belongings and animals, misusing my business assets, and creating uninhabitable conditions are **forms of harassment and coercive control (RCW 7.105.010)**. My safety and livelihood are directly tied to access to my property. The court has the authority to order such access in a protection order where property interference is part of the harassment."

**II. ARGUMENTS AGAINST DENYING CANDI'S PETITION (Case #: 25-2-03361-31)**

1. **Opposing Argument: "Mr. Miller's counter-allegations are false or designed to distract from his own misconduct."**
   * **Your Counter-Argument:** "Your Honor, my statements are factual and supported by evidence. My detailed response refutes each of Petitioner's claims. For example, my communication with my daughter, Samantha, was a direct result of Petitioner violating my anti-harassment order (Case No. 25-2-03181-31) by using Samantha as an intermediary, irresponsibly manipulating her own child to circumvent a court order."
2. **Opposing Argument: "Mr. Miller engaged in aggressive actions (e.g., December 2024 incident) justifying Petitioner's fear."**
   * **Your Counter-Argument:** "Your Honor, Petitioner's own actions in December 2024 included physical assault (striking, pushing, spitting, following) and kicking in the shop door when I attempted to retreat. This conduct created a substantial risk of injury. While a criminal DV case is filed against me stemming from this, I deny her allegations as presented and am actively fighting the charge. My actions were a direct consequence of Petitioner's extreme instigation, including ongoing neglect, mind games, and stonewalling tactics that provoked distress."
3. **Opposing Argument: "Mr. Miller is unstable or a threat (e.g., from April 13, 2025 incident)."**
   * **Your Counter-Argument:** "Your Honor, the April 13, 2025 incident was a medical crisis due to a mistaken dose of a substance, occurring while I was under extreme duress from Petitioner's harassment. Petitioner was aware of my critical state but allowed me to remain unattended for hours until I was near death, constituting neglect of a vulnerable adult. This conduct highlights *her* disregard for my safety and *her* actions that destabilized me, rather than me posing a threat."
4. **Opposing Argument: "Mr. Miller has lied to authorities (e.g., July 30, 2024, November 6, 2024 incidents)."**
   * **Your Counter-Argument:** "Your Honor, in the July 30, 2024 incident, Petitioner was arrested due to my head injury. I provided false information to police to facilitate her release, demonstrating my vulnerability and her capability. In the November 6, 2024 incident, I was arrested based on *her* false report, with police never establishing probable cause for the lying charge against me. These incidents show *her* pattern of false reporting and manipulation."

**III. OVERARCHING THEMES TO EMPHASIZE (In both contexts):**

* **Pattern of Harassment & Coercive Control:** Reiterate that Petitioner's actions are part of a consistent, escalating pattern to control, isolate, and harm you (RCW 7.105.010).
* **Vulnerability:** Stress your status as a vulnerable adult (RCW 74.34.020) and how Petitioner systematically exploited this.
* **Direct Threat to Health & Safety:** Connect her harassment directly to your ongoing life-threatening medical condition and its exacerbation by stress.
* **Violation of Court Orders:** Highlight her direct and indirect violations of prior orders (RCW 7.105.450), including her attorney's recent attempt to impose communication restrictions that contradict your TPO.
* **Unlawful Property Interference:** Emphasize her pattern of denying access, withholding property/animals, and imposing uninhabitable conditions, which are clear violations of property rights and tenant laws (RCW 59.18.290, 59.18.300).
* **Court's Prior Finding:** Always refer to the Temporary Protection Order granted in your favor on May 30, 2025 (Case No. 25-2-04968-31), as it is a judicial finding of harassment *by her* against *you*.

**Remember to:**

* **Stay calm and factual.** Deliver your points clearly and directly.
* **Refer to your documents and exhibits.** "As stated in my Declaration..." or "As shown in Exhibit [Number]..."
* **Address the judge respectfully.** "Your Honor..."
* **Listen carefully.** Adapt your responses to the specific questions asked, but always steer back to these key facts and legal arguments.
* **Consult your actual attorney immediately** to discuss this guide and prepare for the hearing.