From: AnnaLisa C. Danysh

Sent: Friday, February 9, 2024 1:05 PM

To: Vanessa G. Woods <woods@lasher.com>; Lisa Ann Sharpe <sharpe@lasher.com>

Cc: Kirsten A. Serkin < kserkin@insleebest.com >

Subject: RE: Moyer: Agreed Temporary Order - earlier draft entered

Vanessa and Lisa Ann,

Following up on Vanessa and Kirsten's communications, below, I am forwarding an Amended Restraining order. It has been changed slightly since the last version that you signed and which we were supposed to file but erroneously did not. First, it indicates Adrian's correct age: 11, not 9. Second, in the "other restraining orders" section, it is rephrased slightly to more clearly present the content. I do not believe it makes material changes from the last version.

If acceptable, please sign and return and we will get the correct version filed.

Regards,

AnnaLisa

Lisa Summers

From: Kirsten A. Serkin <kserkin@insleebest.com>

Sent: Friday, February 9, 2024 9:31 AM **To:** Vanessa G. Woods; AnnaLisa C. Danysh

Cc: Lisa Ann Sharpe

Subject: RE: Moyer: Agreed Temporary Order - earlier draft entered

[EXTERNAL]

Hi Vanessa,

Yes, I accidentally filed the wrong version. We will be in touch soon with an Amended TRO.

Sorry about that!

Thanks, Kirsten



Kirsten A. Serkin | Paralegal

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From: Vanessa G. Woods < woods@lasher.com>

Sent: Friday, February 9, 2024 9:23 AM

To: AnnaLisa C. Danysh <adanysh@insleebest.com>; Kirsten A. Serkin <kserkin@insleebest.com>

Cc: Lisa Ann Sharpe <sharpe@lasher.com>

Subject: Moyer: Agreed Temporary Order - earlier draft entered

Good morning,

In reviewing the temporary restraining order filed by your office earlier this week it appears that the earlier draft from Jan 24th was entered instead of the most recent version agreed and signed on Feb 5th. Can you please confirm the later updated draft was received and advise why the earlier superseded version was entered? I have attached our email enclosing the latest approved Agreed Temporary Restraining Order as well as the signed order itself for your reference.

Best regards,

From: AnnaLisa C. Danysh <adanysh@insleebest.com>

Sent: Tuesday, February 6, 2024 11:16 AM

To: Vanessa G. Woods <woods@lasher.com>; Kirsten A. Serkin <kserkin@insleebest.com>; Lisa Ann Sharpe

<sharpe@lasher.com>

Subject: RE: Letter from AnnaLisa Danysh and TRO - Moyer

[EXTERNAL]

Received. Thank you.



INSLEE AnnaLisa C. Danysh | Shareholder
Skyline Tower, Suite 1500 | 10900 NE 4th Street | Bellevue, WA 98004 P: 425.450.4234 | F: 425.635.7720

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From: Vanessa G. Woods < woods@lasher.com> Sent: Tuesday, February 6, 2024 11:01 AM

To: Kirsten A. Serkin <kserkin@insleebest.com>; Lisa Ann Sharpe <sharpe@lasher.com>

Cc: AnnaLisa C. Danysh <adanysh@insleebest.com> Subject: RE: Letter from AnnaLisa Danysh and TRO - Moyer

Good morning,

Please see attached Temporary Restraining Order signed by Lisa Sharpe.

Best regards,

Vanessa G. Woods

Legal Assistant DIRECT +1 206-654-2488



601 UNION STREET ■ SUITE 2600 ■ SEATTLE WA 98101

FAX 206-340-2563 WWW.LASHER.COM

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From: Kirsten A. Serkin < <u>kserkin@insleebest.com</u>>

Sent: Monday, February 5, 2024 4:27 PM To: Lisa Ann Sharpe <sharpe@lasher.com>

Cc: AnnaLisa C. Danysh <a danysh@insleebest.com>; Vanessa G. Woods <woods@lasher.com>

Subject: Letter from AnnaLisa Danysh and TRO - Moyer

[EXTERNAL]

Hi Lisa,

Attached is a letter from AnnaLisa Danysh and accompanying TRO.

Thank you, Kirsten



INSIEE Kirsten A. Serkin | Paralegal Skyline Tower, Suite 1500 | 10900 NE 4th Street | Bellevue, WA 98004

vCard | website | kserkin@insleebest.com

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Message Report

Generated: 02/26/2024 at 07:15 AM by Robert Moyer

Number of messages: 1

Timezone: America/Los_Angeles
Parents: Robert Moyer, Christine Moyer
Child(ren): Adrian Moyer, Max Moyer

Third Party:



OurFamilyWizard 701 N Washington Ave Suite 700 Minneapolis, MN 55401 ourfamilywizard.com info@ourfamilywizard.com

Message 1 of 1

Sent: 02/26/2024 at 07:12 AM

From: Christine Moyer

To: Robert Moyer (*First Viewed: 02/26/2024 at 07:12 AM*)

Subject: Re: Round II: RO Updates

Agree to RO updates. Thank you

On 02/26/2024 at 07:10 AM, Robert Moyer wrote:

To: Christine Moyer (First Viewed: 02/26/2024 at 07:11 AM)

Subject: Round II: RO Updates

Updates for the next RO-

Thanks for the constructive feedback. We will adhere to all the "child or property" related constraints as well as the civility and tone standards that need to be observed. We will do this in a way that addresses your very real concerns about feeling like the mediums below are misused for attacks and threats. Ideally, this is a baby step in a phased approach to normalcy.

Below is what I think we can agree on. I included "urgent updates" to the OFW call approvals and will adhere to the spirit. The purpose is if we have plans that go sideways that result in an inconvenient hardship or an urgent FYI but are not technically an "emergency". School nurse call or missed drop off is what I am thinking. It has to be real. It has to be urgent.

Blessed Updates:

- Use OFW email for urgent updates but allow for OFW-facilitated phone calls if necessary and always for emergencies.
- Allow emails with 3rd parties as proposed, and for "fyi" 1-1 initiated updates and inline responses, as necessary.

Other Updates:

- We sent Anna Lisa a request to remove a "credible threat for physical violence" last week, which I'm sure you saw.

I think this covers the most critical obstacles to a constructive working protocol. I even think it could accommodate a "running list" format if we mutually agree it fits the definition proposed. If you do not, I am open to updating if you like, or just not facilitating that discussion for now. But I think we desperately need it, and just need to be disciplined not to pervert the intent.

I truly hope this is an accurate interpretation of your wishes and accommodates your concerns. If you feel like I am trying to nefariously manipulate you or the situation, I am all ears. That is not my intent. It would be great to have this in place this week and see what it gets us. If you green light, I will send to Lisa this AM. You may need to push Anna Lisa. tbh, she is slow. I am hopeful.

best

robert

Message Report

Generated: 03/19/2024 at 12:53 PM by Robert Moyer

Number of messages: 1

Timezone: America/Los_Angeles
Parents: Robert Moyer, Christine Moyer
Child(ren): Adrian Moyer, Max Moyer

Third Party:

OurFamilyWizard ourfamilywizard.com info@ourfamilywizard.com (866) 755-9991

Message 1 of 1

Sent: 02/06/2024 at 09:49 AM

From: Christine Moyer

To: Robert Moyer (*First Viewed: 02/06/2024 at 09:51 AM*)

Subject: Re: Domestic Abuse

I am confused. Was the RO filed yesterday? What exactly was filed yesterday?

Credible threat- if you disagree please let Lisa know and respond accordingly requesting to remove. I'll connect with AnnaLisa on that box checked.

Communications - can you propose something that you feel is more appropriate. I'm concerned about calls or emails and texts as it is demonstrated they have been ugly, tone is confrontational, scary etc. nothing in recent history demonstrates that will change. I am open to your suggestion.

On 02/06/2024 at 08:57 AM, Robert Moyer wrote:

To: Christine Moyer (First Viewed: 02/06/2024 at 09:44 AM)

Subject: Re: Domestic Abuse

Good Morning,

I have your revised RO. Thank you for getting Anna Lisa to send. Two questions on the terms that I hope that you and I can discuss more cost-effectively than the lawyers.

WRT - [x] Credible Threat: The Restrained Person represents a credible threat to the physical safety of the Protected Person.

Yesterday you told the court I had committed domestic violence. Today you are asking me to sign something that says I am a physical threat to you and the kids. My hands have been there to tie shoes, wipe tears, hold ice packs, make love, walk hand in hand, morning hugs, and make love. That is all they are for with you and the boys.

That is what you have seen and I hope you know is true this morning. Do we need to say you believe that I will beat you and my children? I can't imagine in the deepest depths of my despair over our dissolution I would seek you out and physically harm you or our boys. Must you say that you believe this to be untrue and you think I will beat you all?

WRT - The parties may also communicate via email with third parties included to facilitate business concerning their minor children and/or managing the parties' shared assets.

Thanks again for this. Very helpful. But as I have noted on many occasions that OFW is a terrible platform for much of our communications. It is better as a single subject, single reply, 124 characters, non-copy paste, short burst text tool. Most of the time we communicate on emails we have several things we are trying to resolve in somewhat complex multi-point situations.

And more often than not, we actually do not want to conduct our "sausage-making" in front of the diner who will eat it. But your offer