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FILED

MAR 06 2018

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

**SUPERIOR COURT OF WASHINGTON
COUNTY OF SPOKANE**

In re the Marriage of:

SIRINYA SURINA

Petitioner,

And

AARON MICHAEL SURINA

Respondent.

No. 17-3-01817-0

**MOTION TO EXTEND DISCOVERY
CUTOFF, CONTINUE TRIAL DATE
AND FOR CR 35 PSYCHOLOGICAL
EXAMINATION**

I. Motion

COMES NOW the Petitioner, through her attorney, Keith A. Glanzer, and moves the court for an order as follows:

- 1.1 Extend Discovery Cutoff to 45 days before trial date;
- 1.2 Change Trial Date, and
- 1.3 Enter an order requiring Respondent father to submit to a parent-child assessment by Caitlin M. Soriano, MA, LMHC including but not limited to completing the Adult-Adolescent Parenting Inventory (AAPI-2)
- 1.4 Order the parties to pay their share of Ms. Soriano's fees pursuant to the Child Support Worksheets filed herein, within 30 days
- 1.5 Authorizing Ms. Soriano to promptly release her report and findings to the Court, the GAL, if any, and to Counsel.

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Motion re: Income Tax Return Filing
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KEITH A. GLANZER, P.S.

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1 **II. BASIS**

2 2.1 This motion is based on the facts set forth:

- 3 a. Declaration of counsel below re: current case status and procedure
4 b. Declaration of Sirinya Surina (filed March 6, 2018)
5 c. Brief of Counsel re: CR 35 Motion

6 DATED this 5th day of March 2018.

7 Presented by:

8 
9 KEITH A. GLANZER, WSBA No. 20424
Attorney for Petitioner

11 **DECLARATION**

12 Keith A. Glanzer DECLARES:

- 13 1. I am the attorney for record for Petitioner, Sirinya Surina;
14 2. Petitioner's 1st set of Interrogatories were delivered to Respondent on January
15 22, 2018;
16 3. Opposing Party, Aaron Surina, pro se, has agreed to written legal communication
17 at aaron@surina.org and legal@surina.org, but mostly at legal@surina.org.
18 4. A Notice of Deposition Upon Oral Examination was delivered to Respondent at
19 aaron@surina.org January 20, 2018 setting the deposition of Mr. Surina on
20 Friday, February 2, 2018. The date was subsequently struck by agreement to
21 choose another date more convenient to both parties. No more convenient date
22 has been forthcoming from Mr. Surina. Petitioner's attorney will be forced to set
23 another date to take the deposition.
24 5. An Order to appoint a Guardian ad Litem was entered by the court February 16,
25 2018. Parties were unable to agree upon a GAL. Three names were submitted

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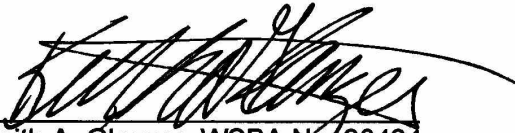
1 from the GAL list maintained by the court with each party striking one name. The
2 remaining name was Heather Lund. Ms. Lund informed the parties she would
3 accept the case and enter an order appointing GAL upon receipt of a \$2,500.00
4 retainer fee.

5 6. An Order re: Allocation of Guardian Ad Litem Fees was entered February 16, 2018
6 ordering Respondent to pay 81% and Petitioner to pay 19% of the retainer.

7 7. Respondent has refused to pay the ordered percentage, maintaining that the
8 Temporary Child Support Order should be modified to order that Petitioner
9 should pay 71% of the GAL fees. Consequently no GAL order has been
10 prepared nor is an order imminent.

11 I declare under penalty of perjury under the laws of the state of Washington that the
12 foregoing is true and correct.

13 Signed at Spokane, Washington on March 5, 2018.

14 
15 Keith A. Glanzer, WSBA No. 20424
16 Attorney for Petitioner
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