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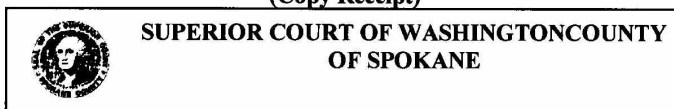
FILED

JUL 18 2018

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

(Copy Receipt)

(Clerk's Date Stamp)



Plaintiff/Petitioner: SIRINYA SURINA

vs.

Defendant/Respondent: AARON SURINA

CASE NO. 17-3-01817-0

NOTE FOR HEARING
ISSUE OF LAW

(NTMTDK)

TO THE CLERK AND TO: Aaron Surina

The undersigned has scheduled a motion for Immediate sale of the family residence, a copy of which is attached.

The hearing is scheduled for 7-27-18 (date) at 10:00 AM (time) before the assigned judge Tony Hazel, Spokane County Superior Court, 1116 W. Broadway Avenue, Spokane, WA 99260-0350.

Motions must be confirmed NO LATER THAN 12:00 NOON, 2 DAYS BEFORE THE HEARING by contacting the judicial assistant for the assigned judge, or the presiding judge for cases that are not assigned.

Name: Keith A. Glanzer

Bar ID: 20424

Telephone No: 509-326-4526

Address: 2024 W. Northwest Blvd

City, State, Zip: Spokane, WA 99205

Date: July 17, 2018

Signed: [Signature]

AUTHORITIES

Cite those authorities which form primary basis for your legal position. Where case authority is cited, provide reference to specific page of opinion, which is controlling. Likewise reference applicable sections or subsection of statutes or court rules. This does not substitute for required Memorandum of Authorities.

Applicable Court Rule: _____

Applicable Statute: _____

Applicable Case Law: _____

NOTE FOR HEARING-ISSUE OF LAW

CR40(a)(2): RCW 4.44.020

Rev: 05/2003

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7 **SUPERIOR COURT OF WASHINGTON**
8 **COUNTY OF SPOKANE**

9 **In re the Marriage of:**

10 **SIRINYA SURINA**

11 **Petitioner,**

12 **And**

13 **AARON MICHAEL SURINA**

Respondent.

No. 17-3-01817-0

**MOTION TO IMMEDIATELY PLACE
FAMILY RESIDENCE UP FOR SALE**

14 **I. Motion**

15 COMES NOW the Petitioner, through her attorney, Keith A. Glanzer, and moves the court for an
16 order to immediately effectuate an arm's length sale of the family residence under the following
17 terms and conditions:

- 18 1.1 The parties have a community interest in real property (hereinafter "the residence")
located at 1616 S. Rock Ridge Drive, Spokane Valley, WA 99212 and more
properly described as:

19 Lot 14 in Block 2, Heather Park First Addition, according to the Plat recorded in
20 Volume 16 of Plats, Page 41;
Situates in the City of Spokane Valley, County of Spokane, State of Washington.

21 Tax Parcel Number: 35261.1514

- 22 1.2 Petitioner, SIRINYA SURINA shall continue to reside in the residence pursuant to
23 the current Temporary Order.

24 In re the Marriage of Surina
25 Motion re: Immediate Sale of Family Residence
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KEITH A. GLANZER, P.S.
2024 W. Northwest Blvd.
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1.3 The parties shall cooperate in immediately listing the home for sale and showing the home on a schedule and in a manner designed to effectuate a sale of the residence which closes as soon after an offer is accepted as possible. Acceptance of an offer that is within the current market value shall not be unreasonably withheld. The net proceeds of sale (after payment of costs of sale, including but not limited to commissions, closing costs, taxes and assessments) shall be deposited into the trust of Keith A. Glanzer, P.S. until further order of the court whether by stipulation or motion.

1.4 The parties shall cooperate in reducing the listing price of the home in a manner designed to effectuate a sale of the residence at the current Spokane, Spokane Valley, Washington real estate market. Upon sale the parties shall cooperate in signing joint escrow instructions to the closing agent which will carry out the terms of this Order.

1.5 Time and good faith compliance are of the essence in effectuating the terms of this order. In the event the provisions regarding the residence require further adjudication for enforcement, full attorney's fees and costs shall be awarded to the substantially prevailing party.

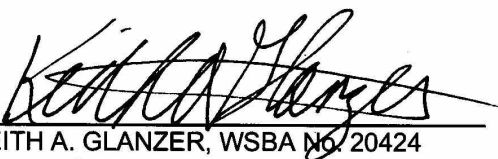
II. BASIS

2.1 This motion is based on the facts set forth:

- a. Records and various documents filed in the file to date
- b. Declaration of Sirinya Surina filed contemporaneously with this Motion.

DATED this 17 day of July 2018.

Presented by:



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

In re the Marriage of Surina
Motion re: Immediate Sale of Family Residence
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