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FILED

DEC 31 2018

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

Superior Court of Washington, County of SPOKANE

No. 17-3-01817-0

In re the Marriage of:

SIRINYA SURINA

Petitioner,

And

AARON MICHAEL SURINA

Motion For The Following:

1. Contempt;
2. To Enter A Finding Re:
Community Property Character
Of Family Residence, and
3. To Order Petitioner, Sirinya
Surina To Act As The Sole
Representative Of The
Community to Manage and
Facilitate The Sale Of The
Family Residence.

Motion for Contempt Hearing

I declare:

1. I am a: Petitioner in this case.
2. The other party: Aaron M. Surina, did **not** obey the orders listed below that were signed by the court on: *September 28, 2017, March 15, 2018 and August 10, 2018* in: Spokane County, WA

1 The Temporary Order entered September 28, 2017, Section 9. Household Expenses:
2 Respondent to pay Vehicle. Respondent's Financial Declaration included Vehicle
3 payment at \$600.00 per month.

4 Order Denying Modification of Child Support and Allocation of Community Expenses
5 Entered March 15, 2018: The court denied a reallocation of the September 28, 2017
6 Temporary Order ordering Respondent to pay Household expenses including the
7 mortgage on the family residence.

8 Order to Immediately Place Family Residence For Sale Entered August 10, 2018. The
9 court ordered the parties to accept offers within the current market value and to not
10 unreasonably withhold acceptance of such offers.

11 *Please see Declarations of Sirinya Surina and Donna Henry, which describes how the*
12 *orders were violated.*

13 **3. Request – I ask the court to:**

- 14
- 15 • Order the other party to go to court to show why the court should not approve the
16 judgment and orders I've requested,
 - 17 • Find the other party in contempt, and
 - 18 • Approve the requests in Section 5 below.

19 **4. Money judgment requested**

20 I ask the court to approve a judgment ordering the other party to pay attorney fees requested
21 below.

	Amount	Interest	From (date)	To (date)
Attorney Fees	\$1,500.00	\$		

22 **5. Fines and penalties (remedial sanctions) requested**

23 Approve other reasonable orders, including ordering the other party to:

- 24 • Enter findings characterizing the family residence as community property to be
25 equitably divided between the parties.
- Name Petitioner, Sirinya Surina, as the managing member of the community to
solely execute the required documents to facilitate the sale of the family residence.
- Reserve a money award to Petitioner in the amount equal to the loss incurred due
to Respondent's unreasonable refusal to accept the reasonable offer as noted in
Petitioner's declaration.
- Pay a fine for each day the court's orders are not followed,
- Meet certain conditions to stop being in contempt (purge the contempt),
- Pay my lawyer fees and costs, and
- Any other relief allowed by law (Chapter 7.21 RCW, Chapter 26.09 RCW, Chapter
26.10 RCW, Chapter 26.26 RCW, and RCW 26.18.040).

1 **6. Other orders requested (if any):**

2 **Person making this motion fills out below:**

3 I declare under penalty of perjury under the laws of the state of Washington that the facts I have
4 provided on this form are true.

5 Signed at Spokane, Washington

Date: 12/29/2018

6 

7 Sirinya Surina
8 Petitioner/Moving Party

9
10 Presented by:

11 

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

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15 Email: kagps70@hotmail.com
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