CN: 201703018170 SN: 272 FILED PC: 28 MAY 1 4 2019 Timothy W. Fitzgerald SPOKANE COUNTY CLERK 5 6 7 SUPERIOR COURT OF WASHINGTON **COUNTY OF SPOKANE** 8 9 In re the Marriage of: **No.** 17-3-01817-0 **SIRINYA SURINA** 10 **DECLARATION OF EMAILING** Petitioner, 11 And 12 **AARON MICHAEL SURINA** Respondent. 13 14 Keith A. Glanzer Declares: 15 1. I am the attorney of record for Petitioner, Sirinya Surina this matter. 2. Throughout Mr. Richard Kuck's representation of Respondent, Mr. Aaron Surina, we have 16 complied with the local motions and declaration timing rules for exchanged pleadings and 17 communication via email. See Exhibit A 18 3. The current Motion for Contempt Hearing and Request for Repairs to Roof was filed April 26, 2019 and emailed to Mr. Kuck on April 26th. I was on the telephone with Mr. Kuck 19 when Melanie Morman, Judge Hazel's judicial assistant emailed me about Judge Hazel 20 not signing the Show Cause Order for May 3, 2019. I immediately informed Mr. Kuck that 21 I would note the Show Cause Order and send him the date for the hearing via separate

4. Respondent asked to "Push hearing out to 24th? 31st?" I refused on behalf of my client by

email to Mr. Kuck. Responsive Declarations were due by close of business on Friday,

In re the Marriage of Surina **Declaration of Emailing** Page 1 of 2

22

23

24

25

email, which I did. See Exhibit B

KEITH A. GLANZER, P.S.

2024 W. Northwest Blvd. Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

1 May 10, 2019. I did not receive any responsive declarations from Mr. Surina. Instead, we continued the email exchange attached, which requested various documents, including an 2 Authorization to Adjust the Insurance Claim and an Assignment of Claim from Mr. Dave 3 Hageman, the roofing contractor. See Exhibit C. 4 5. While Mr. Surina has failed to timely file a responsive declaration, he has made his refusal to cooperate with a legitimate insurance claim which will save thousands of dollars clearly 5 known in his email response of May 13, 2019 where he states "First. Order of business is 6 sell the house as is." See Exhibit D. 7 I declare under penalty of perjury under the laws of the state of Washington that the foregoing is 8 true and correct. 9 Signed at Spokane, Washington, May 14, 2019 10 11 12 Keith A. Glanzer, WSBA No. 20424 Attorney for Petitioner, Declarant 13 14 15 16 17 18 19 20 21 22 23 24 In re the Marriage of Surina KEITH A. GLANZER, P.S. **Declaration of Emailing** 2024 W. Northwest Blvd. 25 Page 2 of 2 Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

RE: Surina Response to Motions

Richard K Kuck <richk@rklaw.com>
Fri 4/26/2019 4:44 PM

To: 'Keith Glanzer' <kagps70@hotmail.com>
Cc: reception@rklaw.com <reception@rklaw.com>

1 attachments (3 MB)
Declaration of Aaron Surina in Response.pdf;

Aaron's Response Declaration.

Richard K. Kuck RICHARD K. KUCK, PLLC 250 Northwest Boulevard, Suite 104 P.O. Box 1320 Coeur d'Alene, ID 83816-1320 (208) 667-3600 | Fax: (208) 667-3379

Idaho Certified Civil Case and Child Custody Mediator Contact BillieJo Campbell (<u>billiejo@rklaw.com</u>) (208) 667-3600 for Mediation Scheduling

The information contained in this transmission may contain privileged and confidential information, including attorney-client privileged information protected by federal and/or state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Keith Glanzer [mailto:kagps70@hotmail.com]

Sent: Wednesday, April 24, 2019 5:46 PM

To: richk@rklaw.com

Subject: Surina Response to Motions

Mr. Kuck

I have not yet received Mr. Surina's responses to my client's motions including a motion for a CR 35 psychological examination.

Your responses are due by close of business on Friday.

EXHIBIT A

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

Surina Show Cause Contempt Insurance Claim

Keith Glanzer Fri 4/26/2019 4:23 PM

To: richk@rklaw.com <richk@rklaw.com>

1 attachments (3 MB)
Show Cause Contempt Insurance Claim.pdf;

Mr. Kuck:

I have added the attached motion to our Scheduled Hearing on Friday, May 3, 2019. I will be asking the court to shorten notice time. Time is of the essence with regard to making this claim to get the roof repaired to move to closing.

Please contact me with any questions.

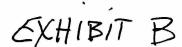
I still have not received his responses.

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.



Re: Show Cause-Surina

Keith Glanzer Fri 4/26/2019 5:00 PM

To: Morman, Melanie < MMORMAN@spokanecounty.org>

Thanks Melanie:

I was on the telephone with Mr. Kuck when I got your email and alerted him to that fact. Mr. Kuck said he would try to settle the matter and move forward with the claim, which I was hoping for. I will however re-note the hearing with regular notice and hope we don't lose the buyer in the meantime.

Is normally for the court May 10, 2019 at 4:00 p.m. is we don't get this settled? Please let me know the next court date and time we can have with this matter.

See you next Friday, May 3, 2019 on the other matters.

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

From: Morman, Melanie < MMORMAN@spokanecounty.org>

Sent: Friday, April 26, 2019 4:49 PM

To: Keith Glanzer

Subject: Show Cause-Surina

Keith, I'm sorry but Judge Hazel said he wants you to note this up normally. He's not going to sign the show cause.

Thanks.

Melanie A. Morman

Judicial Assistant to Judge Tony D. Hazel
Spokane County Superior Court, Dept. 6

1116 W. Broadway Ave., Room 405

Spokane, WA 99260

509-477-4795

Notice: All email sent to this address will be received by the Spokane County email system and may be subject to public disclosure under GR 31.1 and to archiving and review.

Order to Show Cause re Insurance Claim; Set 5-17-19

Keith Glanzer Thu 5/2/2019 3:11 PM

To: richk@rklaw.com <richk@rklaw.com>

1 attachments (473 KB) 05-02-19 ORD SHW CAUSE 5-17-19.pdf;

Mr. Kuck:

I have attached the Order to Show Cause. Judge Hazel sign the Show Cause Order today, setting the hearing at May 17, 2019.

I have already provided you with the Motion and Supporting Declaration. If you need additional copies, please let me know and I will forward them to you.

As we have discussed, I will take my motion off the calendar when Mr. Surina deems it appropriate to agree to moving forward with the insurance claim to replace the roof due to damage covered by Home Site insurance. The roofer and adjuster have already adjusted and qualified the claim. The other option is to reduce the \$326,000 sale price by \$15,000.

Mr. Surina's agreement will need to be in writing to allow for removing the motion from the court calendar.

Thanks for your consideration of this matter.

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error. please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

Page 2 is a Blank page. Kab

about:blank

Page 1 of 2

Superior Court of Washington, County of SPOKANE

In re the Marriage of: SIRINYA SURINA

Petitioner.

And

2

5

6

7

8

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

AARON MICHAEL SURINA

No. 17-3-01817-0

Order to Go to Court for Contempt Hearing (Order to Show Cause) (ORTSC)

Order to Go to Court for Contempt Hearing (Order to Show Cause)

1. Findings

The court has reviewed the *Motion for Contempt Hearing* filed by Respondent and finds there is reason to approve this order.

2. The court orders: Aaron M. Surina to:

Go to court on: Friday, May

Friday, May 17, 2019 at 2:30 p.m.

at:

West 1116 Broadway

in Courtroom 405

Spokane, WA, 99260-0350

Family Law Judge: Judge Tony Hazel

At the hearing, you must show why the court should **not** approve the requests made by the other party and find you in contempt.

RCW 26.09.160 Mandatory Form (05/2016) FL All Family 166

Order to Go to Court for Contempt Hearing

p. 1 of 2

KEITH A. GLANZER, P.S.

2024 W. Northwest Bivd. Spokane, WA 99205 Telephone: 509-326-4526 Facsimile: 509-324-0405

 Approve the other party's requests without hearing your side, and 2 · Issue a warrant for your arrest. If the other party has asked the court to send you to jail, and you cannot afford a lawyer, 3 you may ask the court to appoint a lawyer to represent you. 3. Other orders (if any): 5 Ordered. 6047 7 Orioti, i fillad 8 TONY HAZEL U4Y 03 2019 Date Judge Tony Hazel 10 11 Presented by: 12 13 14 KEITH A. GLANZER, WSB. Attorney for Petitioner 15 16 17 18 19 20 21 22 23 24 RCW 26.09.160 Order to Go to Court for 25 KEITH A. GLANZER, P.S. Mandatory Form (05/2016) Contempt Hearing 2024 W. Northwest Blvd. FL All Family 166 Spokane, WA 99205 p. 2 of 2

Telephone: 509-326-4526 Facsimile: 509-324-0405

Warning! if you do not go to the hearing, the court may:

Re: Options: Push hearing out to 24th? 31St?

Keith Glanzer Fri 5/10/2019 3:09 PM

To: richk@rklaw.com <richk@rklaw.com>

1 attachments (11 KB)

5-10-19 Claim Payment Authorization.pdf;

Mr. Kuck:

I have attached a proposed statement for Mr. Surina to sign to authorize the insurance claim with Home Site insurance as noted in the Authorization.

Please keep me advised about the execution of the document.

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526 Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

From: Richard K Kuck <richk@rklaw.com> Sent: Friday, May 10, 2019 12:42 PM

To: 'Keith Glanzer'
Cc: Receptionist

Subject: RE: Options: Push hearing out to 24th? 31St?

Keith,

Send me the document you would like Mr. Surina to sign for the insurance company for the roof replacement ASAP. Thank you.

about:blank

EXHIBIT C

Page 1 of 5

Richard K. Kuck RICHARD K. KUCK, PLLC 250 Northwest Boulevard, Suite 104 P.O. Box 1320 Coeur d'Alene, ID 83816-1320 (208) 667-3600 | Fax: (208) 667-3379

Idaho Certified Civil Case and Child Custody Mediator Contact BillieJo Campbell (<u>billiejo@rklaw.com</u>) (208) 667-3600 for Mediation Scheduling

The information contained in this transmission may contain privileged and confidential information, including attorney-client privileged information protected by federal and/or state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Keith Glanzer [mailto:kagps70@hotmail.com]

Sent: Friday, May 10, 2019 12:27 PM

To: richk@rklaw.com

Subject: Re: Options: Push hearing out to 24th? 31St?

That is the least of our worries. Why wouldn't the sale close? The buyers are still on board. Everyone is waiting until Aaron reduces his agreement for the insurance company to move forward with the claim to a writing to the company. Or a decision is made by the court next Friday. If the court does not rule favorably, we will have to reduce the sale price of the house by the replacement cost of a new roof.

The Home Site field adjuster has adjusted the claim and there is coverage due to wind damage. I don't have a copy of the adjuster's assessment due to the hold up caused by Aaron. It is a valid claim and the contractor can be on the job next week with a closing the following week. The buyers are waiting to do their appraisal until the roof issue is resolved one way or the other.

We have other litigation issues to resolve. Like an exchange of our witness list due by May 23rd along with a trial joint management report. A pretrial May 30th or so and a trial on June 10th etc.

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

From: Richard K Kuck <richk@rklaw.com> Sent: Friday, May 10, 2019 11:48 AM

To: 'Keith Glanzer'

Subject: RE: Options: Push hearing out to 24th? 31St?

Keith,

If the house sale does not close, how is the \$1,000.00 deductible on the roof repair going to be paid?

Richard K. Kuck RICHARD K. KUCK, PLLC 250 Northwest Boulevard, Suite 104 P.O. Box 1320 Coeur d'Alene, ID 83816-1320 (208) 667-3600 | Fax: (208) 667-3379

Idaho Certified Civil Case and Child Custody Mediator Contact BillieJo Campbell (<u>billiejo@rklaw.com</u>) (208) 667-3600 for Mediation Scheduling

The information contained in this transmission may contain privileged and confidential information, including attorney-client privileged information protected by federal and/or state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Keith Glanzer [mailto:kagps70@hotmail.com]

Sent: Wednesday, May 8, 2019 3:24 PM

To: richk@rklaw.com

Subject: Fw: Options: Push hearing out to 24th? 31St?

Mr. Kuck:

Since you are still the attorney of record until May 16th, I will NOT be responding to Mr. Surina's emails until after that date.

The issue to be heard on Friday, May 17th has to do with meeting the contingency of the recent buyers who are under contract to purchase the property in question.

The most sensible way to resolve this matter is to move forward with the insurance claim, which Home Site's field adjuster has adjusted and agrees the roof should be replaced under the Home Site insurance policy.

Mr. Surina is suggesting he has not received the pleadings, however, your office has been served with the motion and declaration on April 27th and the notice of the May 17th hearing was timely served in our usual manner of exchanging pleadings, i.e. email, due to your office being located out of state.

That Mr. Surina is not agreeing to have a new roof put on this house to consummate this sale is baffling to say the least. I will not agree to continue this matter because time is of the essence in getting his sale closed.

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

From: LEGAL@SURINA.ORG < LEGAL@surina.org>

Sent: Wednesday, May 8, 2019 3:03 PM To: Keith Glanzer; richk@rklaw.com

Subject: Options: Push hearing out to 24th? 31St?

I stil...It is less than 10 days, we need to push it out since I think that recieving papers and being able to form a defense is an important thing.

Try sending the pleadings, once in a while.



Stevens county agreeable on a removal?

Can you send me a copy of your oath of affirmation also?

Respectfully,

Aaron

http://www.linkedin.com/in/voipdesign

aaron@siptrunk.us

707.200.4372

AUTHORIZATION TO ADJUST INSURANCE CLAIM

Re: Home Site Insurance Claim Number: 2442807

I, Aaron Surina, as the named insured on Home Site Insurance Policy Number 33158710, hereby authorize Home Site Ins. to move forward with the above numbered insurance claim.

I further agree to execute any and all documents Home Site Insurance may require me to sign in order to timely adjust this claim.

Further, I will promptly execute any claim checks issued as payment for this claim, payable to me and/or any other entity, (whether it is the mortgage holder or the contractor performing the work), to the contractor who has performed the work and submitted invoices for the work performed.

Executed photocopies of this Authorization shall be as binding as the original.
DATED this day of May 2019
By:Aaron Surina
STATE OF
) ss: COUNTY OF)
Before me, the undersigned authority, on this date appeared Aaron Surina who being first duly sworn on oath deposes and says:
That he is the person identified above, and has read the foregoing and executed the foregoing Authorization to Adjust Insurance Claim
SUBSCRIBED AND SWORN TO before me on the day of May 2019
Name:
Notary Public in and for the state of, residing at,
My Commission Expires:

Fw: Surina - Assignment of Claim

Keith Glanzer Fri 5/10/2019 4:16 PM

To: richk@rklaw.com <richk@rklaw.com>

1 attachments (195 KB)

Glacier-AOC FORM (Assignment of Claim) -Surina .pdf;

Mr. Kuck:

This is the roofing contractor's assignment. I believe Mr. Surina has already spoken with him

This is one of the documents the authorization refers to along with Glacier's contract, which will have to be signed by Mr. Surina as the named insured of the Home Site policy

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526 Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

From: Dave Hageman <dave@myglacierhome.com>

Sent: Friday, May 10, 2019 4:08 PM

To: kagps70@hotmail.com

Subject: Surina - Assignment of Claim

Here is one document we would have to have Mr Surina sign. The other document is our contract.

Assignment of Claim allows us to work with insurance company, the mortgage company and all drafts, checks will have our name on them.

Dave Hageman Owner/President HAAG Certified Roof Inspector Glacier Property Solutions Inc.

206-819-4839 cell 509-420-5663 office

Visit us online! www.myglacierhome.com

ASSIGNMENT OF INSURANCE CLAIM

The undersigned, herein referred to as the "Client(s)", agrees to provide full consideration of the performance of the work pursuant to the contract executed by Client(s) and allow Glacier Property Solutions Inc, herein referred to as "GPS" to file all documents necessary to complete the requirements for filing a claim and settling a claim with the insurance company:



Homesite Insurance (Insurance Company)	for damage sustained to the property	listed below through claim:
This re (Claim #)	eflects a loss sustained at the property kn	own at:
1616 S Rocky Ridge Drive Spo (Property Address)	okane, WA 99212	
respective claim #. In addition, the Glacier Property Solutions Inc. as pay "GPS". to assist, or by this agreement	"Client(s)" instruct the insurance carri- yees on any and all drafts and checks iss ent, file documents necessary to compl	by the above named insurance carrier and er to place both the insured name(s) and sued for the repairs. Furthermore, I allow lete the requirements for any mortgage ections, and return all endorsed checks to
Signed this the	day of	, 20
Client Printed Name	Client Signature	
Client Printed Name	Client Signature	
GPS Printed Name	GPS Signature	
DUE. PER OUR CONTRACT TERMS.	ILT IN LENGTHY DELAYS WHICH CAN C A FIRST PAYMENT IS DUE BEFORE WE EASE FILL OUT THE FOLLOWING INFOR	
Claim #	Date of Loss	
Mortgage Company	Loan	#
Mortgage Company Phone	Contact	ct Name
Mortgage Company Addres	ss (Loss Draft Department)	

Glacier Property Solutions Inc. 16307 E Trent Ave Spokane Valley, WA 99216

Glacier Property Solutions Inc.

16307 E Trent Rd Spokane Valley, WA 99216

Client:

Aaron Surina

Property:

1616-S Rocky Ridge Dr

Spokane, WA 99212

Operator:

DAVEALLS

Estimator:

Dave Hageman

Business: (206) 819-4839

Type of Estimate:

Wind Damage

Date Entered:

4/23/2019

Date Assigned:

Date Est. Completed:

4/24/2019

Date Job Completed:

Price List:

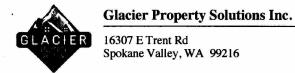
WASP8X_APR19

Labor Efficiency:

Restoration/Service/Remodel

Estimate:

2019-04-24-0614



2019-04-24-0614

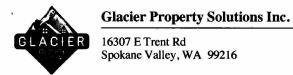
Roof

DESCRIPTION	QTY	RESET	REMOVE	REPLACE	TAX	TOTAL
Remove 3 tab - 25 yr comp. shingle roofing - w/out felt (less back garage section)	32.50 SQ		48.92	0.00	139.91	1,729.81
Wind Damage is beyond repair and shin	gle does not pass brit	tle test.				
Thus, we are recommending full replace	ment other than the b	ack side of the ga	rage (replaced two	years ago)		
2. Replace 3 tab - 25 yr comp. shingle roofing - w/out felt (15% waste factor/less back garage section)	37.67 SQ		0.00	192.49	638.10	7,889.20
3. Replace Asphalt starter - universal starter course (Existing)	358.00 LF		0.00	2.06	64.90	802.38
4. R&R Ridge cap - composition shingles	284.00 LF		2.44	3.77	155.20	1,918.84
5. R&R Valley metal	95.00 LF		0.47	4.96	45.40	561.25
6. Replace Drip edge (CODE)	358.00 LF		0.00	2.10	66.16	817.96
7. Replace Ice & water barrier (CODE) required 2 ft inside heated wall thus 302 ft eaves x 6 ft	1,802.00 SF		0.00	1.64	260.06	3,215.34
8. R&R Chimney flashing - large (32" x 60")	1.00 EA		19.88	470.89	43.19	533.96
9. Remove Additional charge for steep roof - 10/12 - 12/12 slope	32.50 SQ		17.45	0.00	49.91	617.04
10. Replace Additional charge for steep roof - 10/12 - 12/12 slope	32.50 SQ		0.00	62.60	179.04	2,213.54
11. Additional charge for high roof (2 stories or greater)	12.00 SQ		4.20	0.00	4.44	54.84
12. Additional charge for high roof (2 stories or greater)	12.00 SQ		0.00	17.59	18.58	229.66
13. R&R Flashing - pipe jack	4.00 EA		5.59	37.24	15.08	186.40
14. Detach & Reset Roof vent - turtle type - Metal	8.00 EA	50.83	0.00	0.00	35.78	442.42
15. R&R Skylight flashing kit - dome	2.00 EA		4.97	101.14	18.67	230.89
 Replace Digital satellite system - Detach & reset 	1.00 EA		0.00	30.74	2.71	33.45
17. Replace Digital satellite system - alignment and calibration only	1.00 EA		0.00	92.23	8.12	100.35
18. Dumpster load - Approx. 20 yards, 4 tons of debris	1.00 EA		560.00	0.00	49.28	609.28
Totals: Roof				-	1,794.53	22,186.61

2019-04-24-0614

4/24/2019

Page: 2



Miscellaneous

DESCRIPTION	QTY	RESET	REMOVE	REPLACE	TAX	TOTAL
19. Taxes, insurance, permits & fees (Approximate price/ Can do as Incurred)	1.00 EA		0.00	300.00	26.40	326.40
Totals: Miscellaneous					26.40	326.40
Line Item Totals: 2019-04-24-0614					1,820.93	22,513.01

2019-04-24-0614 4/24/2019

Page: 3

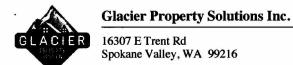
Glacier Property Solutions Inc.



16307 E Trent Rd Spokane Valley, WA 99216

Summary

	Summary	
Line Item Total Sales Tax		20,692.08 1,820.93
Replacement Cost Value Less Deductible		\$22,513.01 (1,000.00)
Net Claim		\$21,513.01
	Dave Hageman	_



Recap of Taxes

 Line Items
 1,820.93

 Total
 1,820.93

2019-04-24-0614 4/24/2019 Page: 5

Fw: Summary judgement

Keith Glanzer Mon 5/13/2019 3:49 PM

To: richk@rklaw.com < richk@rklaw.com>

Mr. Kuck:

Mr. Surina is claiming that he did not receive the documents I emailed to you. You represented to me that you forwarded these documents (Authorization to Adjust Claim and Contractor's required document). I believe you have forwarded these documents to your client. Can you please verify that you have via email to me?

I will forward the documents to Mr. Surina, but I don't want him representing to the court it is his first view of the documents that you already sent to him.

Time is of the essence in this matter due to the current binding Purchased and Sale Agreement.

KAG

Keith A. Glanzer, P.S. 2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526 Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

From: Aaron Surina <aaron@surina.org>
Sent: Monday, May 13, 2019 2:07 PM

To: Keith Glanzer Cc: a-reply@surina.org

Subject: Re: Summary judgement

I don't have any of those.

The house is conveniently taken off the market the busiest time of the year.

EXHIBIT D

about:blank

Page 1 of 4

There is no insurance claim that I have opened because I asked for a time to view my property to file a claim and I was denied. I have not opened a claim nor chosen a bid for this work.

I'd like to see 3 bids for this if I can see there is damage and decide the damage is worth 12000.

The roof has a depreciation value of 75% so I don't know what you are saying other than you are demanding an additional 12000 dollars up front which you also know I don't have.

I have not seen any damage to my property but if there is after the inspection said there isn't, that's going to be clear that the damage is not my fault and I have a claim.

First. Order of business is sell the house as is.

This house is no longer viable for FHA loans due to the declining conditions of the property under occupation by Ms. Polari and her friends.

I'm going to file for summary judgement because there is no clear claim that you're able to obtain at this time.

GAL was paid.

You agree to consolidate the two cases?

On Mon, May 13, 2019 at 12:11 PM Keith Glanzer < kagps70@hotmail.com > wrote: Yes, I mind. I would not have nearly enough time to respond to a Summary Judgment motion.

I would prefer we move forward with the sale of the house you are blocking by not agreeing there is an insurance claim to replace the roof. The contingency of the current Purchase and Sale Agreement, previously provided to you through your attorney Richard Kuck, names the roof repair or credit of the cost of the repaid against the sale price of the house at \$326,000.

I sent you, through your attorney, an Authorization for you to sign and a document you will be required to sign with the contractor who will work with the insurance company to complete the work.

Please have your attorney, Rich Kuck, who is the attorney of record until this Thursday, May 16th, let me know what I can expect.

I will be moving forward with my client's motion regarding your lack of cooperation in this matter on Friday, May 17, 2019 whether I get your responsive declarations or not.

KAG

Keith A. Glanzer, P.S.

2024 W. Northwest Blvd Spokane, WA 99205 Telephone: 509-326-4526

Facsimile: 509-324-0405

CONFIDENTIALITY NOTICE: This message is protected by the Electronic

Communications Act, Sections 2510 through 2521 of Title 19 of the United States Codes, and is confidential and subject to legal privilege (including, but not limited to attorney-client privilege). The information contained in this message is intended only for the use of the above-named recipient. If you are not the intended recipient, you are hereby notified that any dissemination, disclosure, or copying of this communication, including all attachments, is strictly prohibited. If you have received this communication as a consequence of error, please immediately notify us by return email at kagps70@hotmail.com and telephone at 509.326-4526. Please then destroy this original message.

From: Aaron Surina <aaron@surina.org>
Sent: Monday, May 13, 2019 11:02 AM
To: richk@rklaw.com; Keith Glanzer
Subject: Summary judgement

I think i'm going to motion for summary judgement - Keith,

Do you mind if I raise the motion on the 17th? I'll draft it up today.

Very Respectfully,

Aaron

http://www.linkedin.com/in/voipdesign

*707-200-4372 *

This message is intended for the sole use of the addressee, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the addressee you are hereby notified that you may not use, copy, disclose, or distribute to anyone the message or any information contained in the message. If you have received this message in error, please immediately advise the sender by reply email and delete this message.

Very Respectfully,

Aaron

http://www.linkedin.com/in/voipdesign

*707-200-4372 *

This message is intended for the sole use of the addressee, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the addressee you are hereby notified that you may not use, copy, disclose, or distribute to anyone the message

or any information contained in the message. If you have received this message in error, please immediately advise the sender by reply email and delete this message.