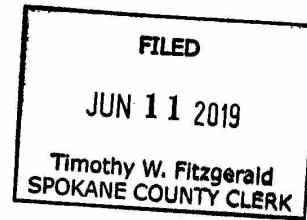


CN: 201703018170

**SN: 289**

PC: 9



**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**

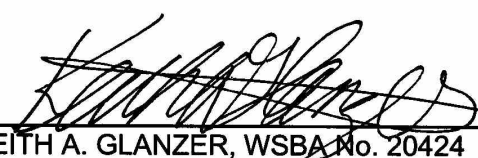
**Motion to Quash June 7, 2019  
Immediate Restraining Order  
and for CR11 Sanctions**

**I. Motion**

Petitioner, Sirinya Surina by and through her attorney, Keith A. Glanzer moves the court for an order quashing the Immediate Restraining order (Ex Parte) and Hearing Notice attorney fees and for CR11 Sanctions.

This motion is based on the declaration of Petitioner below, and the records and files herein.

Dated: 6-11-2019

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

In re Marriage of Surina  
Motion and Declaration to Quash Restraining Order and  
Order Sanctions.  
Page 1 of 4

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

## II. Declaration

Sirinya Surina declares:

1. I am the Petitioner in this case.
2. I have not been "evicted" from my house. I am moving out of my present residence because we sold it.
3. Respondent was fully aware of the time line of selling the house because he met with the closing attorney for two hours at the Spokane County Law Library on the second floor of the courthouse the same day, he appeared in court on the third floor to ask for this emergency order.
4. I had possession of the house on the closing date, June 10, 2019 until 9:00 p.m. The closing date was delayed until Monday, June 10<sup>th</sup> partially due to Respondent's not signing the closing documents until late Friday, June 7, 2019.
5. I am not homeless. I have been looking for a house to rent and making applications on some of them. I have not permanently located, but me, my mom and our children, David and Andrew are comfortably staying at Sunisa and Robert Evans' house at 10103 E. 39<sup>th</sup> Avenue, Spokane Valley, WA 99206 for the rest of this week. Our living arrangements will not interfere with Respondent's scheduled visitation.
6. I am confident I will finish up the process of getting a rental by the end of the week. In the meantime, I and the boys are having a family moving adventure.

- 1 7. Our moving has been anticipated due to the fact we have been trying to sell our  
2 residence since the court entered an order to do so in September 2018.  
3  
4 8. Although Respondent continues to take the position that I am somehow going to  
5 take off with the children and travel to Thailand, I have no such intention.  
6  
7 9. He falsely says he is trying to prevent a child abduction. The last time he acted  
8 on the "advice of the state department" to prevent a child abduction, he flew to  
9 Thailand and obtained a default Thailand divorce that placed the children  
10 primarily in his care. He returned to Spokane and filed the Thailand Orders in  
11 the Spokane County Superior Court fully expecting the court to enforce the  
12 Thailand Orders. The court dismissed the orders awarded attorney fees and  
13 sanctioned the Respondent in the total amount of \$4,000. Respondent still  
14 insists that we are divorced by the Thailand decree. (See Spokane Superior  
15 Court Cause Number 19-3-00129-32) (Exhibit A; Page 23 – 24 VBT of  
16 February 22, 2019 Hearing to Dismiss)  
17  
18 10. Respondent is once again representing to the court that the State Department  
19 has "advised" him to obtain an order banning international travel. He is fully  
20 aware of the process required to accomplish international travel and either he or  
21 his previous attorney, Heather Hoover hold David's passport. Respondent and  
22 his attorney Heather Hoover admit having David's passport at our November 8,  
23 2017. (Exhibit B; Page 20 of VBT for November 8, 2018 Hearing)  
24

1 11. Our trial is scheduled for June 24, 2019 with a Pre-trial conference on June 19,  
2 2019 at 4:00 p.m. (Exhibit C)

3  
4 12. **Request** -- I ask the court to:

5 (a) Quash the Immediate Restraining Order and Sanction Respondent for  
6 bringing this frivolous motion.

7 **Money Judgement requested**

I ask the court to approve a judgment ordering the other party to pay:

| Judgment for                                                                                                                                    | Debtor's name | Creditor's name | Amount      | Interest |
|-------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------|-------------|----------|
| Sanctions                                                                                                                                       | Aaron Surina  | Sirinya Surina  | 1,000.00    |          |
| Lawyer fees and costs                                                                                                                           | Aaron Surina  | Sirinya Surina  | \$ 1,500.00 | \$       |
| Yearly Interest Rate for child support, medical support, and children's expenses: 12% .<br>For other judgments: % (12% unless otherwise listed) |               |                 |             |          |
| Lawyer (name): Keith A. Glanzer represents: Sirinya Surina                                                                                      |               |                 |             |          |
| Lawyer (name): Richard Kuck represents: Aaron Surina                                                                                            |               |                 |             |          |

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

Signed at Spokane, Washington, June 11, 2019

15  
16 

17 Sirinya Surina  
18 Petitioner, Declarant

1 turning that property over into a community property. You were  
2 smart. You didn't do it, but if you had, that property would  
3 have been owned immediately by Carl Wilson. \$370,000 property  
4 for 34 grand. Come on. You think she wanted to sign that? I  
5 don't know, maybe she did. I don't -- I have no idea.

6 These are grave injustices, and they're happening inside  
7 these courts without the judicial authorities really  
8 understanding what's going on because there's not enough time.  
9 There's not enough time for you guys to get acquainted with all  
10 these things. It's scary to me. I mean, I'm just a normal  
11 guy.

12 THE COURT: You have never been trained in law, correct?

13 MR. SURINA: I am a total greenhorn.

14 THE COURT: And you've had two lawyers, right? You've had  
15 Ms. Hoover and you had Mr. Kuck?

16 MR. SURINA: I like Mr. Kuck. Ms. Hoover is the who one  
17 signed my --

18 THE COURT: Both lawyers with pretty good reputations.

19 Do you remember the advice I gave you at one of the  
20 hearings?

21 MR. SURINA: I did.

22 THE COURT: I said you should listen to your lawyer.

23 MR. SURINA: Yes.

24 THE COURT: Do you remember me telling you that?

25 MR. SURINA: Yes, I do.

MOTION TO DISMISS

EXHIBIT A

1 THE COURT: Did you follow that advice?

2 MR. SURINA: Yes, I have. I haven't filed a single motion  
3 for over 11 months.

4 THE COURT: Except did your lawyer tell you to file the  
5 Thailand motion?

6 MR. SURINA: This is a registration that has nothing -- the  
7 State Department did.

8 THE COURT: So in other words, no.

9 MR. SURINA: The State Department told me to do it.

10 THE COURT: In other words, you didn't -- your lawyer didn't  
11 tell you to do that.

12 MR. SURINA: No, the State Department.

13 THE COURT: All right.

14 MR. SURINA: So what we're here today really is I'm seeing a  
15 motion for CR 11 sanctions. CR 11 is that statute of federal  
16 civil procedure that says, hey, everything that I'm attacking  
17 here is honest and has integrity and it isn't nonsense. It's  
18 in an attachment attached to any of my responsive declarations  
19 that are bogus, that's frivolous? No. Where are the CR 11  
20 sanctions coming? Is that the best shot? He doesn't have a  
21 chance at dismissing the registration. The only three things  
22 that you can do on a registration dismissal are service of  
23 process. She was served and that's very apparent. Thailand  
24 would not give a final divorce decree.

25 THE COURT: You say she was served?

MOTION TO DISMISS

1 MR. GANZER: We can put that in the order. I  
2 appreciate it.

3 THE COURT: You may put that in the order.

4 MR. GLANZER: Thanks.

5 THE COURT: Yes. Anything else while we're all here?

6 MR. GLANZER: Not that I can think of.

7 MS. HOOVER: I just want to be clear here, they're  
8 saying that my client has them. He says he doesn't. So she  
9 can have copies of them.

10 MR. GLANZER: What?

11 THE COURT: He doesn't have their passports?

12 MR. SURINA: I do not.

13 MS. HOOVER: He has the kid's passport, David's.

14 MR. SURINA: Yes, I do have David's.

15 THE COURT: You don't have moms or grandmas?

16 MR. SURINA: No.

17 THE COURT: Where is it at that she's alleging that---

18 MR. SURINA: Those are in the safe at the house and  
19 only Siriny has access to that safe.

20 MR. GLANZER: And it's---

21 MR. SURINA: Only Siriny has access.

22 MR. GLANZER: She has a notebook with all her legal  
23 documents in it and that notebook is not the---

24 THE COURT: A notebook?

25 MR. GLANZER: Yeah, there's a notebook of all her legal



**SUPERIOR COURT OF WASHINGTON**  
**Spokane County**

**CASE NO. 2017-03-01817-0**

**SURINA, SIRINY A**

**vs.**

**Petitioner**

**SURINA, AARON M**

**Respondent**

**Amended Domestic Case  
Schedule Order**

**(ORACS)**

**I. BASIS**

Pursuant to LAR 0.4.1 IT IS ORDERED that all parties shall comply with the following schedule:

**II. SCHEDULE**

**DUE DATE**

1. Petitioner's/Respondent's Disclosure of Lay and Expert Witnesses
2. Discovery Cutoff/Filing of Parenting Plan
3. File Financial Declaration, Asset Liability List, and Child Support Worksheet
4. Last Day for Filing Motion to Change Trial Date
5. Last Day for Filing GAL Report or Affidavit
6. Last Day to File Confirmation of Mediation
7. Last Date for Filing and Serving Trial Mgmt Joint Rpt and Exch of Witness Exhibit Lists 04:00 PM 06/19/2019
8. Pretrial Conference 04:00 PM 06/19/2019
9. Trial 09:00 AM 06/24/2019

**III. ORDER**

IT IS ORDERED that all parties comply with the foregoing schedule pursuant to Local Rules 0.4.1 and 16. The parties are ordered to attend mediation with a neutral third person agreed to by the parties or ordered by the court and file proof of mediation on or before the above deadline or sanctions may be ordered.

**DATED: 06/06/2019**

**Tony Hazel  
JUDGE**

**EXHIBIT C**

**TO:**

☐ E-Mail  
☐ US Mail  
☐ Hand Delivery  
☐ \_\_\_\_\_

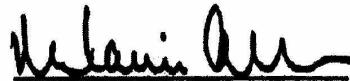
KEITH A GLANZER  
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☐ E-Mail  
☐ US Mail  
☐ Hand Delivery  
☐ \_\_\_\_\_

AARON MICHAEL SURINA  
721 W Hazard Rd  
Spokane, WA 99208-8713  
wa.gov@surina.org

**DECLARATION OF SERVICE**

On June 6, 2019, a copy of this order was served to the parties listed above at the above addresses. I certify under penalty of perjury pursuant to the Laws of the State of Washington that the foregoing Statement is true and correct.



Melanie A Morman  
Judicial Assistant to  
Judge Tony Hazel