

CN: 201703018170

SN: 310

PC: 8

FILED

JUN 24 2019

**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

RESPONSIVE PROCEDURAL
DECLARATION RE: RESPONDENT'S
EMAIL CONTACT WITH THE COURT
RE: MOTION FOR MISTRIAL AND JURY
DEMAND

Keith A. Glanzer Declares:

1. I am the attorney of record for Petitioner, Sirinya Surina this matter.
2. Mistrial and Jury Demand. Respondent contacted the court via email, notifying the court he was bringing a motion for a mistrial and jury demand. (Exhibit A, which is a true and correct copy of Respondent's June 19, 2019 email)
3. Declaration in Support of Motion. Respondent subsequently filed a Declaration in support of a Motion for Mistrial dated .
4. Exparte contact with court staff. Respondent alleges he was procedurally denied a default order on March 27, 2019 and "forced into a continuance" due to intervention when "Amanda [took] opposing counsel's side and filled in for him, stating that he would want a continuance and not a default as "Keith is moms lawyer and would want to continue" or something along those lines." In fact, Respondent was in the process of hiring attorney Richard Kuck and had agreed to a continuance. (Exhibit B, which is a true and correct

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

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

1 copy of Respondent's email thread with your declarant)

- 2 5. Pre-Trial Conference Record. The court read the email and addressed Respondent's
3 request for mistrial and jury demand at the June 19, 2019 pre-trial conference on the
4 record without responsive argument from Petitioner's counsel. Respondent persisted in
5 filing a Declaration in Support of his Motion for a Mistrial.

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

8 Signed at Spokane, Washington, June 24, 2019

9 

10 Keith A. Glanzer, WSBA No. 20424
11 Attorney for Petitioner, Declarant
12
13
14
15
16
17
18
19
20
21
22
23

Mistrial -

Aaron Surina <aaron@surina.org>

Wed 6/19/2019 11:18 AM

To: Morman, Melanie <MMORMAN@spokanecounty.org>; Keith Glanzer <kagps70@hotmail.com>

I am going to send over my motion for mistrial.

The merits of this motion are met above and beyond the simple prejudice comment or equivalent.

I feel like a 2nd class citizen from the bias that Keith Glanzer has so easily created in out of court -ex parte communications with staff including some staff being so involved, they have engaged in the case causing judicial outcomes to change from default to continuance for example when Keith was a no show. I don't have the same public employees working on my behalf. That's a prejudice that I can not overcome very easily. That denied my parenting plan on March 27? 2018 and GAL fee waiver and forced me into a continuance when the commissioner that day was going to grant me a default if Amanda had not taken opposing counsel's side and filled in for him stating that he would want a continuance and not a default as "Keith is moms lawyer and would want to continue" or something along those lines. That was the date of the judicial conferences so we can pull the audio from that docket call session that morning. They were continuing most of the cases unless someone didn't show :). I have been denied what RCW 26.16.125 guarantees now for 2 years after being found to be the only fit parent including being forced into paying 680 dollars that opposing counsel swore they were going to pay if I was willing to do the parent assessment which came out wonderful aside from her concern about Glanzer salting the well and creating a prejudice in ex parte communications.

Keith Glanzer is a key witness in this case. I am apparently being denied the ability to question the star and only witness that has testified orally (on August 14, 2017) making huge statements in regards to this case. Those accusations are being held as evidence and I am not being granted the opportunity to question my accuser. That's not going to work, that is a huge part of my defense in this case.

I also demanded a jury trial by paper for obvious reasons and have yet to hear about selecting jurors. I signed the demand for jury trial at the first status conference where commissioner Anderson was directing the hearing. It was the first status conference in case it's necessary.

I will file the motion and scan it and send it over when I get a chance.

I don't have the money to print out stuff or the joint mgmt report so there is another reason for a mistrial actually. I have 56,000 in proceeds and no lawyer and I'm being forced into a trial with ADHD, being threatened with incarceration for interrupting which is a well known symptom of this impairment and no accommodations outside of jail are being sought.

Please let me know if you need anything other than a motion for the mistrial -

EXHIBIT A

Re: Surina Motions 3/27

LEGAL@SURINA.ORG

Fri 3/16/2018 2:55 PM

To: Keith Glanzer <kagps70@hotmail.com>

I'm hopeful that I will be represented by Richard. He's going to need to get familiar with the case before he's going to be able to speak on my behalf.

I hope to have him officially working with you by the 3rd. No stress on 27th, i politely apologize and agree to the 1 week continuance.

You return on the 27th.

Its a basic mod, quit delaying and let's move on with our case.

I'll go in on the 27th and continue the parenting plan (or before) for a week and run with the waiver. The court lady said it's required for the GAL.

Since you agree to the waiver, we're good, have a good vacation boss!

Respectfully,

Aaron Surina

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

aaron@surina.org

707.200.4372

On Fri, Mar 16, 2018, 2:02 PM Keith Glanzer <kagps70@hotmail.com> wrote:

Are you being represented in this matter? I have been in contact with Rich Kuck with regard to the 26i conference and it is my understanding he will be filing a notice of appearance in this matter and representing you.

I am asking for a 2 week continuance, at least. If you or Mr. Kuck aren't agreeing to 2 weeks, I will have Ezra appear and ask the court for a 2 week continuance on the 27th.

KAG

Keith A. Glanzer, P.S.
2024 W. Northwest Blvd
Spokane, WA 99205

EXHIBIT B

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: Friday, March 16, 2018 12:54 PM

To: Keith Glanzer

Subject: Re: Surina Motions 3/27

Have a great vacation. Im ok continuing a week. Not being able to get a GAL considered.....another month.Its

That pushes the GAL out a month. That's not reasonable to agree to under this court order.

Can i get you the paper copy Tuesday or Wednesday....or the pictures i can send to you directly.

Best option here for the boys, agree to GAL waiver, and we can continue the parenting plan 1 week.

Parenting mod to weekends with Dad and every other thursday?

Maybe we can agree for once in the case, I'm reasonable and flexible. I'm asking for what you've already agreed off the record. Look at the plan and tell me what you would like to see. It's open to negotiating like always. I'm not refusing to compromise on anything but realize your client is not willing to mediate or agree to negotiating on anything.

Mediation was refused again by you and your client. >

You can go in for pp mod on the 3rd if your client refuses to allow the children meaningful access to family who clearly love them.

Let me know what your client will agree to and let's go from there.

Respectfully,

Aaron Surina

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

aaron@surina.org

707.200.4372

.I

On Mar 16, 2018 11:23 AM, "Keith Glanzer" <kagps70@hotmail.com> wrote:

Mr. Surina:

Please send me hard copies of your latest filings. There are several exhibits that will not download clearly through our regular email exchange of Notice and Pleadings. You can also drop the pleadings or have someone else drop them at my office. If the office is closed just drop the papers through my mail slot.

Also, I will be out of my office from March 19, 2018 through March 27th and will require at least a two week continuance of this hearing.

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: Thursday, March 15, 2018 8:40 PM
To: Keith Glanzer
Subject: Surina Motions 3/27

Keith,

Orders are basic, and totally negotiable:

Motion to modify parenting plan -weekends + every other Thursday
Motion to waive private party pay GAL
MTAF attached

We should be able to agree to simple items that are in the children's best interests outside of court. Tsk tsk

Also,

Received the orders today. I've asked my accountant to run the joint job. Mine is still in review. We'll see when that comes back, what it will take to amend. I've asked my accountant to prepare the joint amendment.

You lied to the commissioner saying I didn't file separate last year when you knew that I had. Shame on you.

 20180315140011054.pdf

 20180315185852920.pdf

 20180315190135150.pdf

Respectfully,

Aaron Surina

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

aaron@surina.org

[707.200.4372](tel:707.200.4372)

