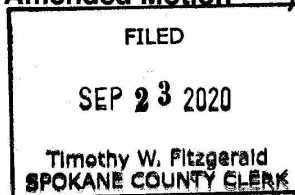


CN: 201703018170

SN: 401

PC: 16

Amended Motion *w/o exhibits*



FILED

2020 SEP 23 P 4:36

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

**Superior Court of Washington,
County of Spokane**

In re: Surina Dissolution	
Petitioner: <u>Sirinya Polarij (Surina)</u>	No. 17-3-01817-0
And Respondent: <u>Aaron Surina</u>	Motion and Order set aside judgement under Rule 60 nun pro tunc – Clerical error
	Amended Final orders
	(MT)

**Motion to vacate/amend judgements
correct clerical errors under Rule 60(a)(b) nun pro tunc;
Amended Final Orders and relief of judgements under
Rule 59a and 60**

1. Relief Requested

- My name is: Aaron Surina I am a pro se litigant and am indigent, I ask the court:
- Order petitioner to provide the 8332 tax exemptions as awarded in the final orders from 2019 forward when opposing counsel attempted to reserve said exemptions and was denied said request in favor of respondent.
- The state's sale of the property taken through the 5th amendment violations was also distributed according to judgements without facts being tried that were assigned due to misunderstanding of who owned the property, who was responsible for a GAL and her indigency and respondent even paid the GAL fees to his lawyer in October of 2018 before the next 8 months would continue demanding the court to participate in title fraud, mortgage fraud and much more

through shocking access to direct the court's orders in violation of the rights of respondent in many matters through this case.

- The court ordered that it was not community property prior to the sale of the house and prior to trial. That was omitted in further hearings regarding community property when a lawyer and judge know that community property in Washington state was legislated out of law in 2008 through 26.16.010..
- The 55,000 that the respondent had titled rights to in forced loss of rents, profits plus the standard 12% court fee which applies for Sept 2017 to Sept 2020.
- To end the siege on respondent's separate property prior to a trial of facts, respondent ended up paying the GAL out of the tax return he ended up paying cash in October of 2018 for the GAL.
- The sole and separate property at the time of the taking is not the calculation used. The compensation has multiplied due to the length of time in default on payment.
- Respondent is asking for just compensation as provided by the 5th amendment. The court can not justify nearly 1,000,000 in takings for a 2500 dollar retainer that respondent had no responsibility to pay for and the investigation was for the petitioner who was indigent.

The court choosing to order a private pay GAL on demand of petitioner's attorney is neither a concern of respondent in these matters years have passed which is the appropriate standard relief. $405,000.00 + (90,000 \text{ in rights violations of lost rent, profits and enjoyment } 2500 \times 36 \text{ months}) + \text{interest at } 0.12\% \text{ standard rate}$ the court issues. There is 29 years of future income to also include as ROE is applied in takings when investment income is a matter to be adjudicated. 348 more months at 2500 (no inflation / conservative estimate at 870,000.00 in equitable returns over the course of this investment at it's current rate of return but without interest attached in these calculations).

The total is 1,365,000.00 not counting the 30,008 in overpaid child support up to the date the state sold it's rights to the property it had seized to cover a public charge which it did not enforce. Respondent paid the GAL fee for the petitioner to try to save the equitable interest and his ability to help her get on her feet in October of 2018 when he paid CASH for the GAL fee for her investigation. The

court continued to deny rights and order more violations of 49.61 (Human rights as property rights).

- Respondent still is waiting for the court's action and has not been compensated for the property which was taken to cover a public charge for an indigent party whom legally was unable to show the court any evidence that she in fact actually had this false ownership in any manner of the property which her lawyer continued to classify as community property knowing the conveyance was legal and intended and there was no entry in the auditor's office within 30 days as required on top of the deed and quit claim forbearance.
- The contract between the parties segregating that property as separate in Washington state met the statute requirements outlined in 26.16, was valid, was notarized and met the requirements which prevented the title company, estate lawyer, opposing counsel and the court from being able to sell the property without the forced and coerced signature of respondent which was provided under the condition that when the stolen property was liquidated, petitioner needed a restraining order assigned to her preventing international travel which was granted and I signed unwillingly and not on my own freewill under threat of this court's continued trafficking of me and my children.
- The court denied respondent's property rights starting on August 14, 2017 which constituted a regulatory takings prior to the court actually selling the house without the titled owner and attempting to have the petitioner whom the title company could not insure as the owner because of her quit claimed interest and omission from the title.
- The court continued to levy judgements at her counsel's demand which April was both sanctions and attorney's fees. Caselaw does not support such abuse of a pro se litigant.
- Respondent had no financial responsibility to pay for a private party GAL that was ordered because of the petitioner's reports that the court found to be credible with regards to abuse and neglect.
- This absolutely establishes that CASA GAL volunteers were available, were

denied by her lawyer to prevent a GAL from entering the record, he was able to get the court to violate the titled rights to property to cover the cost of a GAL 2500 dollar retainer using a 400,000.00 piece of separate property which in a state that is no longer a community property state with regards to real property when 26.16.010 is properly implemented with intention to separate property.

- The respondent was forced into over 30,000 dollars in combination attorney's fees and sanctions which were based on fraud and the assumption that this somehow was community property after the judge refused to declare that prior to finding out about the fraudulent instruments placed on title - **See Exhibit E**
- Respondent needed to be allowed to exercise the benefits of land ownership and receive rents, profits and enjoyment thereof. The courts also denied the respondent's property rights prior to trial forcing the property into foreclosure due to respondent being denied the human right of titled property ownership and the benefits, rents, profits and exercise thereof after respondent's property was seized by fraudulent testimony of hearsay on August 14, 2017 by the petitioner's counsel Keith Glanzer.
- A takings clause cause of action stems from the regulatory takings where the ability to exercise property rights and benefits of property ownership are hindered or denied without the property changing ownership. This is an issue in this court.
- This court forced the sole and separate property owner into homelessness for 17 months and watched the images of his children come through pleadings of numerous black eyes, reports of abuse and neglect which the court even found to be credible.
- None of these protections were granted as rights to the children under 26.09.191 and were ignored, possibly due to financial incentives from dshs which shape placement decisions that are in the state's best interest.
- Award judgement in favor of the respondent for 19,500 dollars which were satisfied by clerical error but denied in the hearings mand should not have been included. See exhibit B (judgement orders and unknown car paid 4,500 to petitioner for 2003 Ford Excursion.

- I have no title or vehicle to date. Please find petitioner in contempt or to purge the contempt, please order petitioner to compel this 9,000.00 vehicle or setoff this nun pro tunc as this fraud was recognized recently when trying to figure out what the court and opposing counsel had negotiated without respondent able to correct the clerical errors.
- Please continue the summer 50/50 parenting plan outlined in the child support order
- Please order judgement on awards satisfied by clerical error and terminate title iv-d services in this case immediately. There has been no abandonment and this is another formal objection under 42USC1301(d) which prevents the state from forcing children into dependency when a fit parent objects and is willing to take charge of their children to prevent such unwarranted intrusion into the families of american people. The respondent is the only support the children have ever had and he never abandoned them. The court recognized the support order was also obtained by fraud and amended the order on Nov 8th 2017 accordingly when respondent insisted the record reflect the truth. The respondent is being trafficked for labor and his income without the court following the social security act and federal regulations. This is why those regulations exist.
- Order judgement in the amount of 800 in fraudulent TANF stolen from respondent's bank account in August of 2017 due to claims that he had moved out of state and abandoned the children and wife while he was the only paying the rent, buying the food and the money was stolen out of his account while she was still living in the same house with him. This is a cause to terminate support in this matter.
- Order to compel subpoena used to obtain account information protected under the computer abuse act.
- The final orders require an amendment for the QDRO to be validated.
- Amend final parenting plan consistent with RCW 26.09.260 by orders to extend the summer parenting plan permanently and re-establishing original primary custodian's fundamental, guaranteed legal rights to the children which were by fraud and deception removed for reasons unrelated to children in pursuit of financial gain as filed on Aug 14, 2017 by Petitioner;

- These guaranteed rights have been, and again are raised and reserved under RCW 26.16.125 in the case, in trial and in motions nun pro tunc for amended orders. State revenue incentives offered for enforcement decisions are in conflict with support orders based on those placement orders being affected through financial incentives.
- This is human trafficking of parents who the court found to be fit, whose support orders were found to be obtained in fraud and were amended on or around Nov 8, 2017 to reflect the start date later than its originally filed application and which were overpaid excessively by clerical error for 3 years.
- The court has an obligation to correct these errors and can do so under rule 59 and 60, nun pro tunc and/or on it's own motion. Please adjudicate these issues of clerical error as motioned and set forth herein..
- The schedule requested is a healing step towards the parties moving forward and children being protected from further decisions to increase the income of the county, court, its agents and the state without regard for the regulations protecting families from their children taken as state dependents without any need for Government assistance and without any abandonment by a deadbeat parent on the part of the parent who is the only support the children have ever had from birth to this very day..
- Order all statute of limitations regarding joint complaints of both parties to recover from actions be stayed and don't begin until parties can communicate and review cause of actions allowing proper access to justice which is ordered blocked from such legal rights to redress.
- Access to the care, custody and control of my children was revoked due to counsel testifying as a witness of hearsay. Respondent moved the court for a mistrial.
- Residential schedule of the summer is a big part in the healing of the parties and their children. The first week of the year rotates based on Christmas so no major changes are required..

- Amend and sign final orders nunc pro tunc to correct the following clerical errors
- Setoff QDRO with denied judgements that the court, through clerical error, awarded.
- Order the county to compensate respondent for 55,000 dollars in lost rental income from the violation of 5th amendment rights to property as a titled owner.
- Order the county to compensate for the taking of his sole and separate property at the time of the taking for twice the value of the property now that 3 years have passed which is the supreme court's standard relief. $(810,000.00 = 405,000 \times 2)$. Respondent still has not been compensated for the property which was taken to cover a public charge for an indigent party whom legally was unable to show the court any evidence that she in fact regained ownership in any manner of the property. The contract between us was valid, was notarized and met the requirements set forth in RCW 26.
- The court denied respondent's property rights based on witness testimony offered by counsel in the case before the case was even filed or therein shortly after on the same morning.
- in order to prevent the waste of respondent's sole and separate property which was legally separated from the community by a married woman whom intended to do so and because respondent had that legal protection even after the court's ordered she be granted all that she had signed away in that contract with a trial of facts to cover the cost of a Guardian Ad Litem for an indigent petitioner whom the court found reports of the abuse and neglect towards the parties children to be credible. This finding and the orders from the trial court judge which allowed non titled parties with absolute quitted claim to the property to attempt to find a way to sell the property as if Sirinya owned it due to 42 which absolutely creates a public charge taking of respondent's sole and separate property which after it was sold, the respondent was forced into over 30,000 dollars in combination attorney's fees and sanctions under cr11 without ever having any issues with pleadings brought up prior to a hearing and where most of the hearings were not even timely filed and with merit under the circumstances. what the court continued to refer to and even recharacter as "community property", Respondent needed to be allowed to exercise the benefits of land ownership and receive rents, profits and enjoyment thereof. The courts also denied the

respondent forcing the property into foreclosure due to respondent being denied the human right of titled property ownership and the benefits, rents, profits and exercise thereof after respondent's property was seized by fraudulent testimony of hearsay on August 14, 2017 by the petitioner's counsel Keith Glanzer.

- A takings clause cause of action stems from the regulatory takings where the ability to exercise property rights and benefits of property ownership are hindered or denied without the property being sold. This is an issue in this court. This court forced the sole and separate property owner into homelessness for 17 months and watched the images of his children come through pleadings of numerous black eyes, reports of being raped by 3rd parties and financial investors in this case including an officer of the court while forcing the only party willing to support his family into absolute financial ruin intentionally. The matters that took place in this court are nothing short of human trafficking and criminal conduct by most of those involved with the case. I sought justice and justice was not found in this courthouse for me where the county issued orders and seized the legal sole and separate property of the respondent on August 14, 2017 and would be deceived into ordering the sale of the house to pay for a GAL to investigate the petitioner whom was indigent. This constitutes a public charge. decisions to reflect the court's ruling on November 27, 2019 on page 10 starting at line 4 to Line 17. The actual amount at separation is attached in August 14, 2017 statement exhibit A
- Award judgement in favor of the respondent for 19,500 dollars which were satisfied by clerical error and should not have been included. See exhibit B (judgement orders and unknown car paid 4,500 to petitioner for 2003 Ford Excursion.
- I have no title or vehicle to date. Please find petitioner in contempt and order petitioner to compel this 9,000.00 vehicle or setoff this nun pro tunc.
- Please continue the summer 50/50 parenting plan outlined in the child support order
- Please order judgement on awards satisfied by clerical error and terminate title iv-d
- The August statement was not immediately available so a statement from Sept 30, 2017 was used to calculate the award. **See Exhibit A FOR UPDATED**

**STATEMENT OF AUGUST 14, 2017 TO RECALCULATE EQUITABLE SPLIT
AT THE DATE OF SEPERATION FOR AMENDED QDRO.**

- The QDRO was actually altered and 1800 in fees was deducted from my Acct in review fees where a reply was given requesting if two awards were ordered doubling the amount.
- November 27th verbatim page 50 lines 15 – 17 order the maximum amount including fees and associated transaction deductions into total amount which are already 1,800.00
- Order to compel subpoena used to obtain account information protected under the computer abuse act.
- The final orders require an amendment for the QDRO to be validated.
- Amend final parenting plan consistent with RCW 26.09.260 by orders to extend the summer parenting plan permanently and re-establishing original primary custodian's fundamental, guaranteed legal rights to the children which were by fraud and deception removed for reasons unrelated to children in pursuit of financial gain as filed on Aug 14, 2017 by Petitioner;
- These guaranteed rights have been, and again are raised and reserved under RCW 26.16.125 in the case, in trial and in motions nun pro tunc for amended orders. State revenue incentives offered for enforcement decisions are in conflict with support orders based on those placement orders being affected through financial incentives.
- This is human trafficking of parents who the court found to be fit, whose support orders were found to be obtained in fraud and were amended on or around Nov 8, 2017 to reflect the start date later than its originally filed application and which were overpaid excessively by clerical error for 3 years.
- The court has an obligation to correct these errors and can do so under rule 59 and 60, nun pro tunc and/or on it's own motion. Please adjudicate these issues of clerical error as motioned and set forth herein..
- Order all statute of limitations regarding joint complaints of both parties to recover from actions be stayed and don't begin until parties can communicate and review cause of actions allowing proper access to justice which is ordered blocked from such legal rights to redress.

- Access to the care, custody and control of my children was revoked due to counsel testifying as a witness of hearsay. Respondent moved the court for a mistrial.
- Residential schedule of the summer is a big part in the healing of the parties and their children. The first week of the year rotates based on Christmas so no major changes are required..

2. **Statement of Issues**

I ask the court to decide the following issues (*specify*):

- The orders submitted after hours on December 20, 2019 were not drafted with the court's final rulings given orally in November of 2019. They were rushed and signed without a hearing between the final ruling and orders submitted by opposing counsel on December 20, 2019. These need to be amended according to Fidelity which requires the final orders match the **QDRO see exhibit A page 3**.
- There was no abandonment by respondent as stated in the application for support services and title IV-D support which took place while still living and being supported by the respondent contrary to application details made in July 2017.
- This objection filed on Sept 4th is based on the provisions found within the SSA preventing unwarranted intrusion into the family of american citizens by Congress and my children are not in need of government assistance.
- QDRO has specific orders given in the court's ruling including all penalties and fees are included in this total award.
- The parties currently have 50/50 parenting plan which is set to revert to a parenting plan that caused many issues and would disrupt the obligations of both parents and the children's education and healing with constant confusion played by the petitioner.
- On September 10th, the petitioner refused to exchange the children, refused to provide a reason why she was withholding them and threatened to call the police if I showed up to pick up my children. I refused to be a no show on my day and

found this to be some sort of new trickery or clever scheme. I do not agree to changing the rotation of weekends going forward either.

- Children's need for increased efforts with elementary educational assistance by both parties.
- There are major disadvantages from caretaker being unable to communicate with children who only speak English and know little if any of her foreign language.
- Petitioner has left the children alone and abandoned them for long periods of time while out with her fiancé; This became an issue recently where the children's friend's parents found them on August 29th, 2020 wandering around the south hill barefoot after dark.
- The petitioner has a fiancé whom has a great job and petitioner stated he makes around the same as I did at Providence and does similar work. They recently bought a brand new Dodge pickup truck in both of their names and stepdad also disciplines the children but has not been added to the child support worksheets reducing the amount of reimbursement the county is able to obtain from title iv-d services in this case.
- The petitioner testified that she often allows the 8 year old to supervise the 4 year old when she's busy and they ride their bikes alone or go to Manito park by themselves with no supervision.
- The children are currently denied communication with anybody including refusing to facilitate communication with their grandparents, local friends and cousins as well as all other family members.
- Remove petitioners request to not receive calls from children when not with her. Children should never be denied phone calls to biological parents. Where was this discussed and why would this be in any order or parenting plan? This is backed by every parenting professional and software for co parenting available. This extends to Dad and this is a denial of a child's rights of access to their fit and loving parent who has been a victim of human trafficking in this very court for 3 years now.
- This communication is a very important part of the children recovering from the 3 years of physical, sexual and emotional assaults they have been forced into.
- Why petitioner does not want her children calling her when with Dad is not for this court to decide but the respondent does not share in this state of mind and asks

the court to consider this issue and allow the children phone contact with Dad. Petitioner and Respondent haven't spoken for 3 years now and have no issues with each other.

- This case was not a case between respondent and petitioner. It was a case between Peittioner's loan brokers and their misuse of civil proceedings against respondent which is why we are here on the 24th still.

3. **Statement of Facts/Ground**

These facts support my request (*list supporting facts*):

- Children are used to the fair 50/50 parenting plan and reverting to the past plans would really disrupt their growth and healing process and cause undue burden to already impacted educational progress from missing so much school last year.
- The respondent was laid off due to the work on phone systems being outsourced to vendors and overall the outdated phone system industry is being replaced by phone calls over the internet
- The respondent's income prior to this very rare position at Providence which he moved to Spokane to work was around 63,000.00/yr. The respondent is unlikely to find another position with the previous income at this time as only two systems exist in the area. The court's phone system and sacred heart. Both have been outsourced in previous reorganization of IT services..
- Children are scoring below average in Public School and have very little available support for american studies while staying with foreign family and being left often in the care of something they can not communicate with consistently.
- This summer schedule has seen the least amount of conflict other than the denial of contact with friends and family which is extremely unnecessary.
- The contract between dshs and county court commissioner services provides incentives for placing the children into the custody of the house with the least income and this incentive directly conflicts with the children's best interest in the case.
- The 50/50 plan has enabled the two boys to re-establish develop relationships with old friends from school, get involved with sports, learning new activities, volunteering, and giving back to their communities and more.
- Dad has no issues with his responsibilities and obligations for the children The

children are active in sports and are not allowed to participate in any activities with their mother.

- The respondent has a right to request the court perform “an ability to pay inquiry on all LFO’s assigned by the court” as caselaw in State of WA vs. Blazini set precedence on. See Exhibit C

4. Evidence Relied Upon

I ask the court to consider declarations and other documents that support this request:

- Exhibit A: QDRO letter of denial without correcting QDRO as outlined and matching amended final orders with correct Fidelity Statement for Aug 14, 2017
- Exhibit B: Judgement documents showing clerical errors for motion denied May 17th by Judge Hazel in the amount of over 19,000.00
- Custodial Interference Case #202020159534 (Waiting for records request)
- The court continued to protect the revenue being received from dshs incentives which are obtained by keeping the children in the petitioner's custody.
- There have been rights which are meant to protect the children denied on numerous occasions and the children are still waiting on counseling ordered in 2018 and a GAL which the court ordered due to the reports of abuse and neglect committed by the petitioner towards the children to be credible in Feb/Mar 2018.
- High ranking members of the WA state Bar implicated in the violent sexual assault of the children which they have reported throughout the case and continue to be terrified to return to their mother's house where her mother has these connections blocked to protect those participating in the abuse that are officers of the court. Counseling and a GAL in this case are basics for children forced to live with the perpetrator of domestic violence, whom testified in trial admitting her actions were violent and other people made her commit those acts and they weren't her fault and still remain the fault of the children when it happens. to process this abusive misuse of civil proceedings by 3rd parties intent on recovering money they were conned out of by the petitioner.

5. Legal Authority

I have the right to ask for these orders according to the law and civil rule 60.

I meet the requirements for the parenting plan modification required in RCW 26.09.260.

The court's intentions and the final ruling of case 17-3-01817-0 which was given orally in person on November 27, 2019 without any further hearings that would remove awards provided respondent other than potential ex-parte communications with the court where respondent was not provided an opportunity to question his accusers.

In State v. Jones, 182 Wn.2d 1, 338 P.3d 278 (2014), a recent unanimous decision by this court, we said that Ford held unpreserved sentencing errors "may be raised for the first time upon appeal because sentencing can implicate fundamental principles of due process if the sentence is based on information that is false, lacks a minimum indicia of reliability, or is unsupported in the record." Jones, 182 Wn.2d at 6.

The current parenting plan and support schedule which was tested during the summer of 2020 and has been almost entirely absent of any and all conflict.

RCW 26.16.125 Washington state legislatures outlined intended parenting plans to be provided to parents of separation and divorce which conflict with dshs incentives offered and contracted currently with Spokane County court commissioners.

Equal rights of parents are reserved and legislated clearly without any ambiguity by the Washington state legislature. Respondent is now aware of dshs manipulating the outcomes of children's placement in Spokane County court cases through financial incentives based on a portion of the reimbursement for enforcement which is relative to the total child support orders according to the active contract. I object to the county's services which were assigned to a support order obtained fraudulently, through a non judicial order (administrative) under the pretense that the respondent had moved out of state and abandoned his wife and children in the original filing which also stated the respondent needed to have a TRO placed upon him to remove him from his property to avoid any assets (still unknown which assets counsel testified about as a witness to start the case on August 14, 2017) from being moved to Idaho. The testimony blocked counsel from further activity as a lawyer on the case but it was ignored when it was brought up in hearings which is reason for a mistrial which also was requested and ignored.

Formal Objection to Spokane county carrying out any services related to Title IV-D as the only parent the court found to be fit, the only parent who has ever supported his children and is willing to provide for them and willing to take charge of his

children to remove them from the dependency of the state of washington and the federal welfare rights assigned under the social security act in error by this court to obtain financial benefit or increase county revenue offered by dshs and omitted from all hearings and case records to date by those benefitting from said incentives.

This right to object and take charge of children is rooted in the social security act signed by congress in 1935 as well as outlined 42 USC 1301(d)

A Formal Objection Letter regarding abandonment claims and reserved rights was filed previously and again on September 4th, 2020. A copy of which was also delivered to Judge Bjelkengren's box in the annex.

The fraud which was necessary to obtain the child support benefits without proper grounds including TANF while living in my house which I was paying for without any knowledge of this fraud is found in 18USC1601(d) Official statements in proceedings conflicting is perjury. This fraud has cost nearly 100,000.00 in erroneous support payments to the party whom the court found reports of abuse and neglect of the children to be credible and ordered a GAL which was continually blocked and misrepresented as ordered for respondent when the petitioner had been charged with assault of a child in the 2nd degree which is torturing a child that was 18 months old. The case was moved to a new judge immediately who had conversations and was influenced outside of hearings to think those reports were the respondent. The court ordered counseling but counsel for the petitioner was implicated in one of the child's interviews as a violent sexual predator who had raped the parties oldest child whom was only 5 years old when Mom was dropping him off at the attorney's for 2 hours where he was forced to take his pants off and was repeatedly and violently molested by him and the man who used this court to provide distraction and remove the primary custodian prior to counsel's witness testimony which the court granted his request to remove all assets, children, and property from his immediate occupation and possession (the respondent) from being able to protect the children or obtain details and pursue prosecution in these matters. This has continued with these men and their associates for 3 years now. The children are victims of the anger of these men whom the petitioner has swindled out of hundreds of thousands of dollars together. The petitioner

continues to find new targets to steal and swindle and convinces them she has huge payouts coming to her in court. I think I have been the victim of the actions of the court allowing 3 separate 3rd parties to seek repayment for money the petitioner has swindled from these men who thought they were loan sharks and found they were pawns in her hustles. Loans which likely total more than any award she's going to ever get from me. They have no idea she's playing them either. Everyone of them has been a victim to her financial swindles and victim hustle she uses on everyone. ENOUGH IS ENOUGH. WE'VE BEEN DIVORCED FOR 2 YEARS NOW AND IT HAS NOT BEEN OBJECTED TO A SINGLE TIME. THIS COURT WAS LATE TO ISSUE ANY DECREE OF DIVORCE AND THIS STATE ACCEPTS THE DIVORCE WHICH WAS FILED IN THIS COURT EARLY 2019.

6. A Proposed Order needs to be drafted and is **not** attached to this Motion.

Person making this motion fills out below

I declare under penalty of perjury under the laws of the state of Washington that the facts I have provided on this form are true. ☒ I have attached (number of): 15 pages.

Signed at Spokane, WA

Date: 9/23/2020



Aaron Surina

Person making this motion signs here

Print name here

I agree to accept legal papers for this case at (check one):

- ☐ the following address (this does **not** have to be your home address):
PO box 30123, Spokane, WA 99223 - (707) 200-4372

FILED
2020 SEP 23 P 4:36
TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK