

CASE NUMBER
201703018170
SN:499.0 PC:6

FILED
7/10/2023
Timothy W Fitzgerald
Spokane County Clerk

Superior Court of Washington, County of Spokane

In re:

Sirinya Surina

Petitioner

And

Aaron Surina

Respondent

No.17-3-01817-0

**Response to Objection about Moving
with Children and Petition about
Changing a Parenting/Custody Order
(Relocation)
(RSP)**

**Response to Objection about Moving with Children and Petition about
Changing a Parenting/Custody Order (Relocation)**

1. Your response

Look at each section of the *Objection* and give your response below.

Statements in the Objection

1. *Name (no response needed.)*

2. *Legal right to spend time with child/ren*

I agree with what the other party said about this

3. *Notice of move*

I disagree with what the other party said about this because I have not relocated.

4. *Substantially equal residential time*

I disagree with what the other party said about this because Aaron does not have substantially equal residential time.

5. *Statements about objecting to the child/ren moving*

Complete a – k below.

a. Relationships

I disagree with what the other party said about this because the relocation would have minimal impact on our children's social relationships. It would not impact their familial relationships as I am not requesting the parenting plan be changed.

RESPONSE TO OBJECTION - 1

KSB LITIGATION, P.S.
510 W. Riverside Ave. #300
Spokane, WA 99201
T 509 624 8988 F 509 474 0358

Statements in the Objection

b. Agreements

I disagree with what the other party said about this because Aaron's answer does not address the law. We had no prior agreements about relocating.

c. Contact

I disagree with what the other party said about this because disrupting the children's contact with me would be more harmful. Aaron's contact with our children will not be disrupted.

d. Limitations

I don't have enough information to agree or disagree with what the other party said about this. Aaron did not address this in his objection. He is subject to RCW 26.09.191 restrictions in our final parenting plan.

e. Reasons for moving

I disagree with what the other party said about this because my reasons for moving are in good faith. I would like more space, a permanent home, and security in where we live that you cannot find renting.

f. Reasons for objecting

I disagree with what the other party said about this because Aaron does not object in good faith. If the relocation is granted, I will be relocating to Cheney from Spokane. The children would not be isolated from anyone.

g. Child/ren

I disagree with what the other party said about this because I have never forced my children to work in my restaurant. I detail this accusation further in my declaration in support of my relocation.

h. Quality of life

I disagree with what the other party said about this because while some things may be unfamiliar at first, the children are still relocating a very short distance from their current life. This is also not what the law considers. The quality of life and resources available to our children and to myself are substantially the same in Spokane and Cheney.

i. Other arrangements

I don't have enough information to agree or disagree with what the other party said about this. Aaron did not answer this in his objection. No other arrangement is needed as I am requesting a relocation that is about fifteen minutes away from where I currently live. Aaron's relationship with our children will not be disrupted.

j. Alternatives

I disagree with what the other party said about this because Aaron's response does not address the law. My alternative is to forego a permanent home and continue to pay increasing rent. It is feasibly, but likely undesirable, for Aaron to relocate.

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Statements in the Objection	
<i>k. Financial</i>	I don't have enough information to agree or disagree with what the other party said about this. The financial impact on me if the relocation is denied is large. I am requesting to relocate partially to lower my overall monthly costs. I am also moving for a better quality of life. If the relocation is granted, the financial impact on Aaron is minimal as the only difference will be our exchange commute.
6. <i>Statements about changing the parenting/ custody order if the child/ren are allowed to move</i>	I disagree with what the other party said about this because I am relocating a very short distance from my current home. A modification to our parenting plan is unsupported.
7. <i>Child Support</i>	I disagree with what the other party said about this because I request the court deny Aaron's request for a major modification and, therefore, his request to modify child support.
8. <i>Protection Order</i>	I agree with what the other party said about this.
9. <i>Restraining Order</i>	I agree with what the other party said about this.
10. <i>Correct County (Venue)</i>	I agree with what the other party said about this.
11. <i>Child/ren's Home/s</i>	I don't have enough information to agree or disagree with what the other party said about this. The children have not, during the past five years, lived on an Indian reservation, outside Washington State, in a foreign country, or with anyone not a party to this case.
12. <i>Other people with a legal right to spend time with a child/ren</i>	I don't have enough information to agree or disagree with what the other party said about this. I do not know of anyone besides me and the other party to this case who has, or claims to have, a legal right to spend time with any of the children.
13. <i>Other court cases involving a child/ren</i>	I agree and disagree with what the other party said about this because I do not know what "filed charges" Aaron is referencing. I am not aware of any criminal charges.
14. <i>Jurisdiction over child/ren</i>	I disagree with what the other party said about this because Washington has exclusive, continuing jurisdiction to make other orders for our children.
15. <i>Fees and costs</i>	I disagree with what the other party said about this because I have a financial need for my attorney fees to be paid and Aaron has the ability to pay. His objection is not brought in good faith.

Statements in the Objection

16. Other requests, if any

I disagree with what the other party said about this because my children do not work in my restaurant. The court should not issue a restraint on this basis.

2. Protection Order

Do you want the court to issue a Protection Order as part of the final orders in this case?

No. I do not want a Protection Order.

3. Restraining Order

Do you want the court to issue a Restraining Order as part of the final orders in this case?

No.

4. Requests

I ask the court to:

Deny the Objection about Moving with Children and Petition about Changing a Parenting/Custody Order (Relocation).

Approve the following orders:

Moving the Child/ren – Allow the child/ren to move with me as described in my Notice of Intent to Move with Children (Relocation).

Parenting/Custody Order – If the court allows the children to move:

Do not change the current parenting/custody order.

Fees – Order the other parent to pay for my costs, lawyer fees, and other fees.

Person filing this Response 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 (including any attachments) are true. [] I have attached (#): _____ pages.

Signed at (city and state): SPOKANE WA

Date: Jul 10, 2023


SIRINYA SURINA / Jul 10, 2023 13:35:27 PST

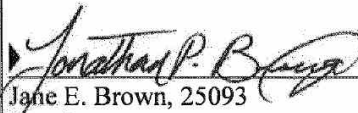
Sirinya Surina

Person filing Response signs here

Print name

I agree to accept legal papers for this case at my lawyer's address, listed below.

Lawyer (if any) fills out below:


Jane E. Brown, 25093
Jonathan P. Bisceglia, 58463

July 10, 2023
Date

510 W Riverside, Suite 300

Spokane

WA 99201

Lawyer's Address

City

State Zip

Email (if applicable): jbrown@ksblit.legal, jbisceglia@ksblit.legal

RESPONSE TO OBJECTION - 4

KSB LITIGATION, P.S.

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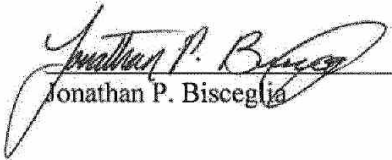
CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2023, I caused to be served a true and correct copy of the foregoing document, by the method indicated below and addressed as follows:

Aaron Surina
PO Box 30123
Spokane, WA 99223

 X

U.S. MAIL
OVERNIGHT MAIL
DELIVERED
FACSIMILE
E-MAIL


Jonathan P. Bisceglia

Response to Objection Surina

Final Audit Report

2023-07-10

Created:	2023-07-10
By:	Jonathan Bisceglia (jbisceglia@ksblit.legal)
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-  Document created by Jonathan Bisceglia (jbisceglia@ksblit.legal)
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