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TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

FILED

2023 SEP -1 P 4: 53

SUPERIOR COURT OF WASHINGTON, COUNTY OF SPOKANE

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

In re: Surina v Surina

Petitioner:

Sirinya Surina

v.

Respondent:

Aaron Surina

No. 17-3-01817-0

Ex-Parte Motion for immediate Orders

(MT)

Ex-Parte Immediate Motion for Orders due to recent findings

Aaron Surina
PO BOX 30123
Spokane, WA 99223
707-200-4372
legal@surina.org

Page 1 of 7

Case No 17-3-01817-0 |

Ex-Parte motion for immediate orders preventing unilateral decisions without the court

in re: Surina v Surina

Aaron Surina

September 1, 2023

1 September 1, 2023
2 ---

3 Honorable Judge Steve Dixon
4 Spokane County Superior Court
5 1116 W. Broadway Ave
6 Spokane, WA 99201

7 Johnathan Biscelgia
8 KSBLIT Law
9 jbiscelgia@ksblit.legal
10 Spokane, WA 99201

11 Logan Rogers [Deputy Clerk]
12 Spokane County Superior Court
13 1116 w. Broadway Ave
14 Spokane, WA 99201
15 ---

16
17 **Re: Immediate Request for Ex-Parte Orders in Case No: 17-3-01817-0**

18 Your Honor, and Esteemed Parties,
19

20 I am writing this letter to bring to your immediate attention an alarming procedural
21 discrepancy and a situation that poses a significant threat to the well-being of my
22 children, David and Andrew. A hearing scheduled for August 11, 2023, was neither
23 communicated to me nor the opposing party apparently, and as a result, neither of us were
24 present for it. Consequently, a hearing appears to have occurred without either party
25 present, rendering the court's actions on that date inexplicable and leaving this case in a
26 perilous state. What was before the court? Where was the process service for this
27

Page 2 of 7

Case No 17-3-01817-0 |

in re: Surina v Surina

Ex-Parte motion for immediate orders preventing unilateral decisions without the court

Aaron Surina

September 1, 2023

1 hearing?

2
3 **### Immediate Need for Ex-Parte Orders**

4
5 Given this procedural anomaly and the immediate risks it poses to my children, I urgently
6 request the issuance of ex-parte orders for the following:

7
8 **1. Preventing Relocation and School Enrollment Changes:** An immediate order to
9 prevent the children's mother from unilaterally changing their school district or location, thus
10 keeping them from being isolated from their established support networks, friends, family,
11 and most notably, their father. Their normal school and friends all start on Tuesday of next
12 week. My oldest son is scheduled for his launch conference in 45 minutes.

13
14
15 **2. Right of First Refusal:** An immediate order granting me, the father, the right of first
16 refusal for any care arrangements for the children. This would prevent them from being left
17 with third parties when they could be in the care of a biological parent.

18
19 **### Legal Justifications**

20
21 This request is in alignment with RCW 26.09.260 and federal case law, including Troxel v.
22 Granville, 530 U.S. 57 (2000), which collectively uphold the father's constitutional rights for
23 the care, custody, and control of his children. The unilateral actions currently being taken not
24 only violate the law but also directly compromise the children's well-being.

1
2 **Other Immediate Reliefs**

3
4 I also request an immediate inquiry into the circumstances surrounding the erroneous
5 scheduling of the hearing on August 11, 2023. The lack of proper service and notice to
6 both parties raises serious questions about procedural integrity and due process.

7
8 Your Honor, my children are on the brink of having their lives upended to save their
9 mother a mere six minutes on her daily commute while they are isolated from their
10 established lives. Such a situation is untenable and must be addressed immediately to
11 prevent irreversible harm. I trust that you will consider this request with the utmost
12 urgency it requires.
13

14
15 **Conclusion:**

16
17 I, Aaron Surina, appreciate the court's attention to this motion and request. I firmly
18 believe that your intervention will ensure justice and fairness in this matter,
19 protecting the rights and well-being of all parties involved.
20

21
22
23 I remain committed to upholding the principles of justice and maintaining the
24 utmost professionalism throughout this litigation. Thank you for your attention to
25 this matter, and I look forward to the Court's guidance in resolving this case.
26
27

1 I, Aaron Surina, the undersigned, do swear or affirm under penalty of
2 perjury that the foregoing is true and correct to the best of my
3 knowledge and belief.
4

5 DATED this 1st day of September, 2023 and signed in Spokane County,
6 Washington
7

8 
9
10 Aaron Surina
11

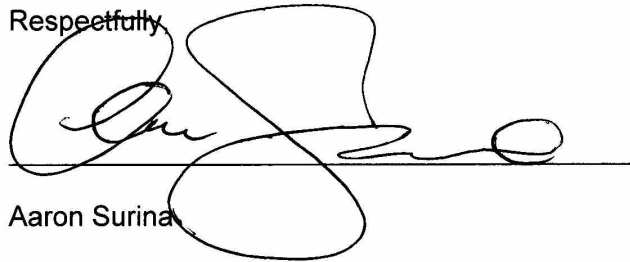
12 **Attachments:**
13

- 14
- 15 1. Case No: 17-3-01817-0 – my note for hearing is filed on the record, July 28, 2023.
 - 16 2. Previous Court Orders and Hearing Notices are not on the record and none received for
17 an August 11, 2023 hearing.
 - 18 3. Trial Minutes dated August 11, 2023 and incorporated as set forth herein.
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- 20
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CERTIFICATE OF SERVICE

I certify that on September 1st, 2023 a copy of this pleading / motion to
move the court was served on the counsel of the petitioner, by email.

Respectfully

A large, stylized handwritten signature in black ink, appearing to read 'A. Surina', written over a horizontal line.

Aaron Surina

 /s/ _____

Location: Spokane County, Washington