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2023 SEP 25 P 2:51

SUPERIOR COURT FOR THE STATE OF WASHINGTON TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

IN AND FOR THE COUNTY OF SPOKANE

SIRINYA SURINA,

Plaintiff,

vs.

AARON SURINA,

Defendant

Case No.: 17-3-01817-0

**MOTION TO COMPEL
DISCLOSURE OF ALL RELEVANT INFO**

**RESPONDENT'S MOTION TO COMPEL DISCLOSURE OF RELEVANT AND NEW
INFORMATION PRIOR TO WITHDRAWAL OF OPPOSING COUNSEL**

I. INTRODUCTION

This Motion seeks to compel Petitioner's counsel to disclose any newly discovered or relevant information that remains undisclosed before they withdraw from representing the Petitioner.

II. BACKGROUND

1. Petitioner's counsel has filed a notice of intent to withdraw from the case.
2. This Court has established hearing dates starting the beginning of October.

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1 3. Petitioner's counsel has submitted orders containing multiple inaccuracies,
2 raising concerns about the integrity of the legal process and its impact on the
3 case's outcome.
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5 6 7 **III. LEGAL STANDARD**

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9 Under Washington Rules of Civil Procedure (CR), Rule 26, parties are entitled to obtain
10 discovery of any non-privileged matter pertinent to any party's claim or defense.
11 Additionally, RPC 3.3 mandates that an attorney must not knowingly make a false
12 statement of fact or law to a tribunal.
13
14

15 16 **IV. DEMAND FOR DISCLOSURE**

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18 In light of these standards and facts, this Motion urges the Court to compel Petitioner's
19 counsel to disclose any newly discovered or relevant information prior to their
20 withdrawal to preserve the integrity, fairness, and efficiency of these proceedings.
21
22

23 **V. PRAYER FOR RELIEF**

24 The Respondent respectfully requests this Court to:
25

- 26 1. Grant this Motion to Compel Disclosure of Newly Discovered or Relevant
27 Information;
28

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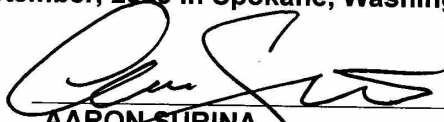
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- 1 2. Order Petitioner's counsel to disclose any pertinent or recently discovered
2 information prior to their withdrawal;
3
4 3. Award any other relief the Court deems just and proper.
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6
7 Dated this 23rd day of September, 2023 in Spokane, Washington
8

9 
10 AARON SURINA
11 [RESPONDENT - FATHER]
12

11 Aaron Surina
12 PO BOX 30123
13 Spokane, WA 99223
14 ams@surina.org
15 707.200.4372
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