

CN: 201703018170

SN: 588

PC: 4

FILED

MAR 26 2024

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

Superior Court of Washington, County of Spokane

In re: RELO w/o notice - custody trial

Petitioner/s (*person/s who started this case*):

Sirinya Polarj (Surina)

And Respondent/s (*other party/parties*):

Aaron Surina

No. 17-3-01817-0

Supplemental to motion or reconsideration of
court's ruling, motion for new trial (CR59)
(MT)

**SUPPLEMENTAL TO MOTION FOR
RECONSIDERATION**

1. Relief Requested

COMES NOW the Respondent, Aaron Surina, who respectfully submits this supplemental to the motion for reconsideration and expressly objects to the unethical behavior demonstrated by the Petitioner's counsel (Stanley Kempner Jr.). This supplement further elaborates on the request for appropriate judicial oversight and sanctions due to actions that undermine the integrity of the court and the justice system.

I. Introduction

This supplement addresses the specific and egregious conduct of the Petitioner's counsel in failing to disclose critical information to the Court and the Respondent. This failure pertains directly to the duty to note the modification of custody hearing, a duty

deliberately ignored in an attempt to re-litigate previously decided issues to the disadvantage of the Respondent, a pro se litigant.

II. Objection to Unethical Behavior of Opposing Counsel

A. Failure to Disclose and Misrepresentation

The Petitioner's counsel, knowingly obligated to note the modification of custody hearing as directed by the Court, chose to withhold this information. By proceeding to litigate matters already favorably decided for the Respondent, the counsel has engaged in deceptive practices that mislead both the Court and the Respondent. This act of omission and commission constitutes a direct violation of the ethical standards expected from an officer of the Court.

B. Lack of Candor Towards the Tribunal

Such behavior exhibits a clear lack of candor towards the tribunal and the new presiding judge. This not only disrespects the judicial process but also exploits the vulnerabilities inherent to pro se litigation. The intentional obfuscation of critical procedural steps and prior court decisions is antithetical to the principles of fairness, transparency, and justice.

C. Request for Judicial Oversight and Sanctions

Given the severity of these actions by a veteran attorney, the Respondent requests the Court to exercise its judicial oversight by reprimanding the Petitioner's counsel for perpetuating fraud upon the Court and displaying a flagrant lack of candor. Such conduct should not be tolerated, especially from an individual with 42 years of experience in the law, where the expectation of adherence to ethical standards is significantly higher.

III. Conclusion and Relief Sought

In light of the above, the Respondent respectfully requests the Court to:

Acknowledge the objection to litigating previously ruled on issues made in the hearing by respondent on March 12, 2024 and this objection to the re-litigating issues that the court did rule in favor of respondent and the unethical behavior of the Petitioner's counsel regarding their attempts to relitigate those matters.

Conduct a thorough investigation into the conduct of the Petitioner's counsel and impose appropriate sanctions for the ethical breaches identified.

Reinforce the integrity of the judicial process by upholding the doctrines of Res Judicata and Collateral Estoppel, affirming the decisions previously made in favor of the Respondent.

Order a new trial which is a modification of custody provided by the court's previous rulings

Grant all other reliefs requested in the initial motion for reconsideration and its amendments.

The respondent intends this to be respectfully submitted,

Aaron Surina

PO BOX 30123

Spokane, WA 99223

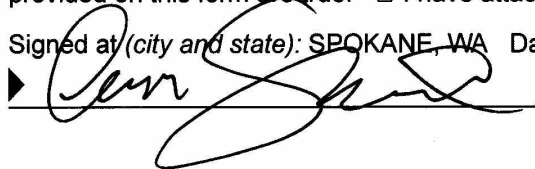
707-200-4372

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): _____ pages.

Signed at (city and state): SPOKANE, WA

Date: ~~3/20/24~~ 3/22/24 ^{us}₁₅

▶ 

AARON SURINA

I agree to accept legal papers for this case at PO BOX 30123, SPOKANE, WA 99223

NOTARY BLOCK

Subscribed and sworn to (or affirmed) before me on this 20th day of March, 2024, by

Aaron Surina, proved to me on the basis of satisfactory evidence to be the person

who appeared before me.

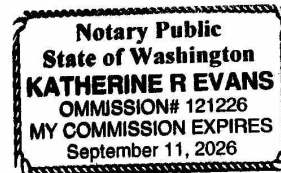
Notary Public for the State of Washington

DECLARATION DATE: 03/22/24

FULL NAME: Katherine R. Evans

COUNTY OF SPOKANE

Katherine R. Evans



My commission expires: 09/11/2026

Sworn and subscribed attached Document: