

CN: 201703018170

SN: 59

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FILED

OCT 19 2017

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

Superior Court of Washington, County of SPOKANE

In re the Marriage of:

SIRINYA SURINA

Petitioner,

And

AARON MICHAEL SURINA

No. 17-3-01817-0

Motion for Contempt Hearing
(MTSC)

Motion for Contempt Hearing

To both parties:

Deadline! Your papers must be filed and served by the deadline in your county's Local Court Rules, or by the State Court Rules if there is no local rule. Court Rules and forms are online at www.courts.wa.gov.

If you want the court to consider your side, you must:

- File your original documents with the Superior Court Clerk; AND
- Give the Judge/Commissioner a copy of your papers (if required by your county's Local Court Rules); AND
- Have a copy of your papers served on all other parties or their lawyers; AND
- Go to the hearing.

The court may not allow you to testify at the motion hearing. Read your county's Local Court Rules, if any.

Bring proposed orders to the hearing.

To the person filing this motion:

To schedule a hearing on this motion, you must ask the court to sign the Order to Go to Court for Contempt Hearing (Order to Show Cause) (FL All Family 166). This Order may be signed "ex parte" (without the other party there). Contact the Superior Court Clerk's office for the procedure in your county. You must have this Motion and the Order to Go to Court personally served (by someone else) on the other party.

To the person receiving this motion:

If you do not agree with the requests in this motion, file a statement (using form FL All Family 135, *Declaration*) explaining why the court should not approve those requests. You may file other written proof supporting your side.

1 I declare:

2 1. I am a: Petitioner in this case.

3 2. The other party: Aaron M. Surina, did **not** obey the orders checked below that were signed
4 by the court on: October 6, 2017 in: Spokane County, WA

5 The restraining order.

6 *Describe how the order was **not** obeyed including dates and times:*

7 Aaron M. Surina contacted me via email and text in violation of the parts of the order
8 restraining him from contacting in writing and only about the children.

9 He entered onto my premises in violation of the order to exchange our children
10 curbside. He further violated the curbside exchange order when entered into our
11 child's school and blocked David from leaving with me and herded him out the door
12 and into his car at the school. Please see Declaration of Sirinya Surina in Support of
13 Contempt Motion and attachments filed contemporaneously with this Motion.

14 3. **Request** – I ask the court to:

- 15
- 16 • Order the other party to go to court to show why the court should not approve the
 - 17 judgment and orders I've requested,
 - 18 • Find the other party in contempt, and
 - 19 • Approve the requests checked below.

20 4. **Money judgment requested**

21 I ask the court to approve a judgment ordering the other party to:

	Amount	Interest	From (date)	To (date)
Attorney Fees	\$1,500.00	\$		

22 5. **Fines and penalties (remedial sanctions) requested**

23 Approve other reasonable orders, including ordering the other party to:

- 24 • Pay a fine – civil penalty (required for violations of parenting time orders),
- 25 • Pay a fine for each day the court's orders are not followed,
- Meet certain conditions to stop being in contempt (purge the contempt),
- Pay my lawyer fees and costs, if any,
- Give me make-up parenting time, if appropriate, and
- Any other relief allowed by law (Chapter 7.21 RCW, Chapter 26.09 RCW, Chapter 26.10 RCW, Chapter 26.26 RCW, and RCW 26.18.040).

1 **6. Other orders requested (if any):**

2
3 **Person making this motion fills out below:**

4 I declare under penalty of perjury under the laws of the state of Washington that the facts I have
5 provided on this form are true.

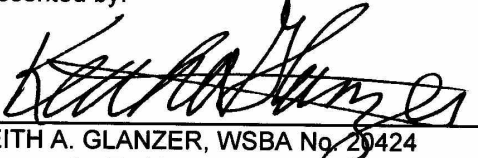
6 Signed at Spokane, Washington

Date: 10/19/2017

7 
8 _____
9 Sirinya Surina
10 Petitioner/Moving Party

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

12 Presented by:

13 
14 _____
15 KEITH A. GLANZER, WSBA No. 20424
16 Attorney for Petitioner

17 Email: kagps70@hotmail.com

18 **Warning!** Documents filed with the court are available for anyone to see unless they are sealed. Financial,
19 medical, and confidential reports, as described in General Rule 22, **must** be sealed so they can only be seen by
20 the court, the other party, and the lawyers in your case. Seal those documents by filing them separately, using a
21 Sealed cover sheet (form FL All Family 011, 012, or 013). You may ask for an order to seal other documents.