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FILED
MAR 26 2024
TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

SIRINYA SURINA, Petitioner And AARON SURINA, Respondent.	NO. 17-3-01817-0 DECLARATION OF STANLEY KEMPNER RE: ATTORNEY FEES

I, Stanley A. Kempner, Jr., declare as follows:

1. I am the attorney for the Petitioner and submit this declaration in support of her request for the award of attorney fees incurred on her behalf in the defense of Respondent's objection to relocation and other motions by the respondent.

2. I have been practicing law in Washington for 43+ years.

3. My hourly rate is $300 per hour that is reasonable in the community and my experience.

4. Petitioner has incurred $10,023.00 in attorney fees as described in the History Bill attached.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 25TH day of March, 2024 in Spokane, Washington.

STANLEY A. KEMPNER, JR.
WSBA #11260

STANLEY A KEMPNER, JR.
Attorney at Law
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Stanley A. Kempner, Jr.
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900 N. Maple St., Suite 200
Spokane, WA 99201

History Bill

Date: 3/25/2024

Sirinya Surina — Client No.
Surina, Sirinya — Case No. 17-3-01817-0

Date	Staff	T/E	Description	Dur/Qty	Amount
10/10/2023	SAK	T	meeting with client and open new file	1	$300.00
10/10/2023	SAK	T	review of documents supplied on thumbdrive	0.8	$240.00
10/10/2023	SAK	T	Telephone call with court administrator's office and with client concerning whether there are motions set	0.1	$30.00
10/11/2023	SAK	T	Preparation of email to Miguel Garcia concerning issues to be presented at hearing	0.2	$60.00
10/16/2023	SAK	T	telephone call to attorney Jonathon Bisceglia	0.3	$90.00
10/16/2023	SAK	T	meeting with Aaron Surina (he dropped items off at office)	0.5	$150.00
10/17/2023	SAK	T	Review of documents received from Aaron on 10/16/23	0.4	$120.00
10/18/2023	SAK	T	Review of proposed orders from attorney Bisceglia and file	1	$300.00
10/18/2023	SAK	T	telephone call to client in response to her e-mail	0.1	$30.00
10/19/2023	SAK	T	Preparation of email regarding proposed orders sent to judge's clerk	0.2	$60.00
10/20/2023	SAK	T	Review of email from client and preparation of response	0.1	$30.00
10/21/2023	SAK	T	preparation of notice of presentment	0.1	$30.00
10/23/2023	SAK	T	review of discovery submitted by Aaron	0	$0.00
10/24/2023	SAK	T	review of documents filed by Aaron on 10/12/23	0.5	$150.00
10/24/2023	SAK	T	Telephone call with client to go over issues regarding hearing and extracurricular activities	0.4	$120.00
10/25/2023	SAK	T	review of e-mail from Aaron regarding proposed orders and tax forms and preparation of response	0.2	$60.00
10/26/2023	SAK	T	preparation of motion for contempt re: back child support	0.4	$120.00
10/26/2023	SAK	T	telephone call to client concerning support arrears and explaining to her why needed the entire readout from DCS as to Aaron's support in arrears	0.2	$60.00
10/27/2023	SAK	T	review of e-mail from client, preparation of response and additional preparation of motion for contempt regarding child support	0.4	$120.00
10/30/2023	SAK	T	review of e-mail from Aaron addressed to Miguel Garcia and preparation of argument before Judge Dixon	1	$300.00
10/31/2023	SAK	T	preparation for and attendance at presentment hearing	1.5	$450.00
11/01/2023	SAK	T	Preparation of email to court regarding setting times for contempt motion and trial setting	0.2	$60.00
11/07/2023	SAK	T	review of discovery submitted by Aaron and e-mail to client regarding same.	0.4	$120.00
11/09/2023	SAK	T	telephone call to client concerning discovery issues	0.2	$60.00
11/15/2023	SAK	T	telephone call to client concerning discovery issues	0.2	$60.00
11/15/2023	SAK	T	Telephone call with client concerning discovery issues	0.8	$240.00

Stanley A. Kempner, Jr.
Attorney at Law
900 N. Maple St., Suite 200
Spokane, WA 99201

History Bill

Date: 3/25/2024

Date	Staff	T/E	Description	Dur/Qty	Amount
11/15/2023			preparation of responses to Aaron's discovery requests		
11/15/2023	SAK	T	telephone call to Miguel Garcia about case scheduling	0.2	$60.00
11/16/2023	SAK	T	preparation of discovery response continued	1.06	$318.00
11/22/2023	SAK	T	preparation of note for trial setting	0.2	$60.00
1/04/2024	SAK	T	Preparation of email to Kim Kilham about scheduling trial etc.	0.1	$30.00
1/24/2024	SAK	T	Review of e-mails from Aaron concerning impending trial	0.15	$45.00
2/02/2024	SAK	T	meeting with client to go over questions etc for trial	1	$300.00
2/04/2024	SAK	T	preparation of trial brief continued and begin trial preparation	2	$600.00
2/28/2024	SAK	T	preparation of brief	1.2	$360.00
3/04/2024	SAK	T	telephone call from client to discuss submissions from Aaron	0.5	$150.00
3/04/2024	SAK	T	preparation of trial brief	2.5	$750.00
3/04/2024	SAK	T	review of documents received from Aaron	0.3	$90.00
3/05/2024	SAK	T	preparation of trial brief continued and preparation of exhibits	2	$600.00
3/08/2024	SAK	T	meeting with client to go over trial questions	1.5	$450.00
3/11/2024	SAK	T	trial preparation continued	2	$600.00
3/12/2024	SAK	T	attendance at afternoon trial session	2	$600.00
3/12/2024	SAK	T	attendance at morning trial session	3.5	$1,050.00
3/20/2024	SAK	T	review of Aaron's motion for reconsideration	0.2	$60.00
3/24/2024	SAK	T	preparation of final order and motion for CR 11 sanctions and to prevent vexatious litigation and preparation of brief in support of those issues.	1.8	$540.00
			Subtotal	33.41	$10,023.00
			Total	33.41	**$10,023.00**
			Total Time and Expenses	**33.41**	**$10,023.00**