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FILED

JAN 10 2018

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

**SUPERIOR COURT OF WASHINGTON
COUNTY OF SPOKANE**

In re the Marriage of:

SIRINYA SURINA

Petitioner,

and

AARON M. SURINA

Respondent.

No. 17-3-01817-0

**PETITIONER'S DISCLOSURE OF
LAY AND EXPERT WITNESSES**

SIRINYA SURINA, by and through her attorney, Keith A. Glanzer, submits her initial Disclosure of Lay and Expert Witnesses as follows:

LAY WITNESSES

1. Sirinya Surina, Petitioner
2. Aaron M. Surina, Respondent
3. On Wilson, Close Friend
4. Carl Wilson, Close Friend
5. Benjamas Srirattankun
6. Rachel Bos
7. Sunisa Evans
8. Betty Sitter

In re the Marriage of Surina
Petitioner's Disclosure of
Lay and Expert Witnesses
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EXPERT WITNESSES

1. Crystl Murray-Mills
2. Katie Dickerson
3. Rob Shebor

RESERVATION OF WITNESSES

Petitioner, Sirinya Surina, specifically reserves the right to call any and all witnesses identified by the Respondent, including experts, as though the witnesses were fully set forth herein. Petitioner, Sirinya Surina, reserves the right to strike any and all witnesses listed above.

As discovery has not been completed in this case, Petitioner, Surinya Surina, reserves the right to call any additional lay or expert witnesses she deems necessary for purposes of rebuttal of facts or opinions revealed in the course of the discovery process.

RESERVATIONS OF RIGHTS

Petitioner reserves the following rights:

1. To supplement this list as further investigation and discovery may warrant;
2. To call any witnesses subsequently identified through the investigation or discovery process;
3. The order in which the witnesses are listed in this Witness List is not the order in which witnesses will be called at trial.
4. To call any witness on Respondent's list regardless of whether the Respondent calls the witness;
5. Not to call any witness on either party's list;
6. To call any witness needed to authenticate documentary or physical evidence;
7. To amend this list;
8. To call or recall any witness on this list for rebuttal purposes during trial.
9. Petitioners reserve the right to call any witness not previously disclosed for purposes of impeachment and/or rebuttal.

1 10. Petitioners' witness list is necessarily based upon evidence, including documents and
2 testimony that have been made available up to the date of this filing. To the extent any
3 party has withheld or otherwise failed to produce non-privileged, responsive documents
4 or deponents have refused to provide testimony regarding discoverable, non-privileged
5 information, Petitioner's reserve the right to call as witnesses individuals whose identify
6 or relevance to the matters in dispute becomes apparent from such late-provided
information.

7 Upon request of Respondent, Petitioner will provide contact information for each of her lay and
expert witnesses.

8 Dated this 8th day of January 2018 in Spokane, Washington.

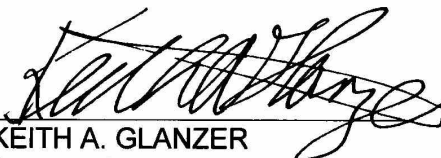
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11 KEITH A. GLANZER, WSBA No. 20424
Attorney for Petitioner

12 **CERTIFICATE OF MAILING**

13 I certify that a true and correct copy of the document to which this is attached has
14 been served upon Respondent via email at aaron@surina.org, legal@surina.org and
15 US Postal Service, addressed to:

16 Mr. Aaron Surina
17 P.O. Box 30123
Spokane, WA 99223

18 On this the 8th day of January 2018

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20 
21 KEITH A. GLANZER
22 Attorney for Petitioner
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