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STATE OF WASHINGTON
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CLERK

No. 95327-9

SUPREME COURT OF THE STATE OF WASHINGTON

In re: the Marriage of
Raluca Vetrici,

Respondent,

v.

Grigore Vetrici,

Appellant.

RESPONDENT'S (COMBINED) ANSWER TO (1) APPELLANT'S SECOND AMENDED MOTION TO EXTEND TIME AND (2) APPELLANT'S AMENDED PETITION FOR REVIEW

By:

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1. INTRODUCTION

Mr. Grigore Vetrici's ("Grigore") Motion for Contempt filed with the trial court was frivolous and an attempt to relitigate matters already ruled on in Ms. Raluca Vetrici's ("Raluca") favor in Canadian courts. The sanctions issued against him were well justified because his motion had no basis in law and was designed to harass and further impoverish Raluca.

Division 2 found his appeal of the trial court's ruling frivolous to extent of ordering fees on appeal against Grigore. Its decision was well-reasoned and it is unnecessary for this Court to grant a petition for review, let alone grant the extraordinary relief of hearing Girgore's late petition.

Furthermore, since Division 2's opinion was issued in September of 2017, Grigore has waged a campaign of late and frivolous filings also designed to harass and impoverish Raluca. Raluca deserves compensation for attorney fees incurred and she respectfully requests them in this Answer.

2. ISSUES

2.1. Whether this Court should consider Grigore's untimely (Amended) Petition for Review? No.

2.2. Whether this Court should grant Grigore's Petition for Review? No.

3. FACTS

3.1. During the summer of 2009, the parties' children moved to

Canada. (CP at 71-72, Canadian Order).

3.2. In May of 2010, Raluca filed for dissolution with Thurston County Superior Court. (CP at 6-15, Petition). Under the heading “Jurisdiction Over the Children” she stated, “The Canadian Courts have jurisdiction over the children at the present time, due to the children residing in Canada.” (CP at 11-12, Petition).

3.3. Grigore did not contest the dissolution proceedings; rather, he joined the petition. (CP at 15, Petition). On August 6, 2010, the trial court issued a formal Decree of Dissolution. (CP at 35-41, Decree of Dissolution).

3.4. In addition to dissolving the parties’ marriage, that order contained the following relevant provision:

> 3.10 Jurisdiction Over the Children
> The court has no jurisdiction as they reside in Canada with father.

(CP at 36-40, Decree of Dissolution).

3.5. The Findings of Fact and Conclusions at Law issued with the Decree contain the following relevant provision:

> Other: The [Registered Education Savings Plan, i.e., RESP] account for the children is not part of this action.

(CP at 27, Dissolution Findings of Fact and Conclusions of Law).

3.6. The transcript of the presentation hearing provides in pertinent part the following:

[GRIGORE]: I -- I have a concern with that. One of the –

THE COURT: Okay.

[GRIGORE]: One of the assets that we have is a registered education savings plan - I don't know - in the name of the kids. Does this Court take jurisdiction over that? My -- that was -- that was (inaudible).

THE COURT: The decree indicates this Court has no jurisdiction over the children as they reside in Canada.

[GRIGORE]: That's correct, so would that be a fund with the children, not with the property division then?

THE COURT: There is nothing in the findings or the decree that discussed this educational fund.

[GRIGORE]: That's correct.

THE COURT: So there's nothing that mentions it at all, so the Court isn't dealing anything with it. I'm guessing Canada can do that.

[GRIGORE]: Okay. Thank you.

***

THE COURT: And there are two children, Maria and Sophia, that jurisdiction is going to be in Canada on these children; is that correct?

[RALUCA]: Yes.

THE COURT: Okay. So these are children from another relationship you have?

[GRIGORE]: No, it's our marriage. It was from our marriage.

[RALUCA]: Yeah.

THE COURT: All right. But they reside in Canada with you?

[GRIGORE]: They reside in Canada with me. They're currently visiting with their mom for the summer.

> THE COURT: All right.
>
> [GRIGORE]: They are actually down here right now.
>
> THE COURT: All right. Okay. So any issue, the parties agree, regarding child support or the parenting plan of these children will be dealt with in Canada.

(RP (August 6, 2010) at 5-8).

3.7. Grigore never moved under CR 60, or any other authority, to correct any perceived mistake in the parties' final orders.

3.8. Starting in January 2013, unsurprisingly, the parties litigated all issues regarding the children in Canada. (CP at 74-76, Canadian Order).

3.9. Grigore filed and lost his appeal. (CP at 63-81, Canadian Order).

3.10. Grigore then brought a motion for contempt against Raluca in December of 2015. In which, he essentially requested Thurston County Superior Court do what he was unsuccessful in getting the Canadian courts to do—revert the parenting arrangement back to what he enjoyed prior to May 2013. (CP at 43-47, Motion for Contempt).

3.11. The trial court denied Grigore's motion for contempt on December 24, 2015. (CP at 90, Commissioner's Order on Contempt). Grigore moved for reconsideration, and that motion was denied. (CP at 109-110, Commissioner's Order on Reconsideration).

3.12. Grigore brought numerous other motions challenging the trial

court's denial of his motion for contempt, and the trial court denied him relief. (CP at 101-102, Amended Motion for Clerical Mistake; CP at 107, Show Cause Order; CP at 114-124, Motion to Revise; CP at 174, Judge's Order Denying Revision; CP at 174, Judge's Order Denying Revision; CP at 175-181, Motion for Reconsideration of Revision; CP at 231, Judge's Email Order Denying Reconsideration of Revision Order; CP at 284-288, Revision Findings of Fact; CP at 289-290, Letter Order from Judge).

3.13. Ultimately, the trial court's reasoning, in pertinent part was as follows:

- There was no Washington order for which Raluca was in contempt;

- The trial court lacked jurisdiction over the parties' children and all issues related to the children because the children lived in Canada at the time of the dissolution;

- The remaining issues raised by Grigore in his motion for contempt were without merit; and

- Grigore's motion was a violation of Civil Rule 11 as it lacked a reasonable basis, lacked reasonable inquiry into the law and facts, and was brought for an improper purpose of harassing and impoverishing Raluca.

(CP at 284-288, Revision Findings of Fact; CP at 289-290, Letter Order from Judge).

3.14. Division 2, filed its unpublished opinion on September 26, 2017. It affirmed the trial court's decision denying Grigore's motion to hold Raluca in contempt. (Unpublished Opinion). It also affirmed the trial court's

imposition of CR 11 sanctions and attorney fees against Grigore. (Unpublished Opinion).

3.15. Grigore argued on appeal that the trial court erred because it (1) misconstrued the dissolution decree, (2) failed to consider the welfare of the children, (3) erroneously gave full faith and credit to the parties' Canadian family law proceedings, (4) erroneously failed to find Raluca in contempt, and (5) erroneously imposed CR 11 sanctions and attorney fees against him.

3.16. As to the dissolution decree, welfare of the children, and giving full and faith and credit to the Canadian family law proceedings, Division 2 held that "the trial court's findings are supported by substantial evidence and that the conclusions of law are supported by the findings of fact." (Unpublished Opinion at 10).

3.17. As to whether the trial court erred in not holding Raluca in contempt, Division 2 held that substantial evidence supported the trial court's ruling that Raluca did not violate any court order and that the trial court did not err in denying Grigore's motion for contempt. (Unpublished Opinion at 20).

3.18. As to whether the trial court erred in granting CR 11 sanctions and attorney fees against Grigore, Division 2 held that "the trial court's bases for imposing CR 11 sanctions on Grigore were proper."

(Unpublished Opinion at 22). It also held that his due process rights were not violated. (Unpublished Opinion at 23). As to Raluca's request for attorney fees on appeal, Division 2 granted that request because it found Grigore's appeal to be frivolous. (Unpublished Opinion at 24).

3.19. On October 26, 2017, Grigore filed a "Motion for Extension of Time to File the Motion for Reconsideration" with Division 2.

3.20. On October 30, 2017, Grigore filed "Appellant's Motion for Reconsideration" with Division 2.

3.21. On November 1, 2017, Grigore filed "Appellant's Amended Motion for Reconsideration" with Division 2.

3.22. On November 16, 2017, Division 2 denied Grigore's requested relief of reconsideration.

3.23. On December 6, 2017, Grigore filed "Appellant's Motion to Publish" with Division 2.

3.24. On December 8, 2017, Division 2, provided a letter order stating Grigore's Motion to Publish was untimely and that the court would take no further action.

3.25. On December 18, 2017, Grigore filed "Appellant's Motion for Extension of Time to File the Petition for Review" with Division 2.

3.26. On December 21, 2017, Grigore filed a "Petition for Review" with Division 2.

3.27. On January 19, 2018, Grigore filed a "Petition for Review" with this Court. On the same date, he filed "Petitioner's Motion to Amend Motion to Extend Time to File Petition for Review" with this Court. Finally, Grigore filed "Petitioner's Amended Motion to Extend Time to File Over-Length Petition for Review" with this Court.

3.28. On January 24, 2018, this Court provided a letter order stating Grigore had not filed a $200 filing fee. The letter order also granted Grigore's motion to amend his motion for an extension of time; however, the letter order stated:

> Turning to the amended motion for extension of time, the parties are advised that no ruling is being made at this time regarding the request for additional time to file the petition for review. The ruling will be made by the Court at a yet to be determined date. If the Court does not grant the motion for an extension of time to file, the untimely petition for review will not be considered by the Court. If the Court grants the motion for an extension, then the Court will proceed to consider the untimely petition for review.

Finally, the letter order denied Grigore's motion to file an overlength petition for review and instructed him to "file an amended proposed petition for review of no more than 20 page by February 14, 2018."

3.29. On February 14, 2018, Grigore filed an "Amended Petition for Review" with this Court. He also filed Petitioner's Motion to Further Amend Motion to Extend Time to File Petition for Review" with this Court. Finally, he filed "Petitioner's Second Amended Motion to Extend Time to

File Petition for Review with this Court."

In the Amended Petition, it appears that Grigore argues the following (in pertinent part) as reasons for this Court to accept review:

(A) Division 2's decision conflicts with decisions of this Court and published decisions of the Court of Appeals. (Amended Petition at 3). Specifically, it appears Grigore's *pro se* argument is that Division 2 erred by reviewing his appeal under a substantial evidence standard; in contrast, Grigore believes that his appeal should have been reviewed *de novo*. (See Amended Petition at 3-5). Alternatively, he appears to argue that if an abuse of discretion standard applied, the trial abused its discretion. (See Amended Petition at 8-10).

(B) Division 2 erred by affirming the trial court's determination that it lacked jurisdiction over the children. (See Amended Petition at 6-8, 10-14). Specifically, it appears Grigore's *pro se* argument is that the trial court "had a duty to rule" on issues (e.g., support, custody, etc., previously decided by the Canadian courts) regarding the children. (See Amended Petition at 6-8, 10-14).

(C) Division 2 erred by not recognizing his appeal raised significant questions of law and policy under the Constitution of the United States. (Amended Petition at 3). Specifically, it appears that Grigore believes that Division 2 made an error of constitutional magnitude, under RCW

4.24.820(2), by upholding the trial court's determination that Canadian courts had proper jurisdiction over the parties' children. (See Amended Petition at 16-18).

(D) Division 2 erred by affirming the trial courts award of sanctions against him and erred by granting attorney fees on appeal against him. (See Amended Petition at 18-20). Specifically, it appears Grigore's *pro se* argument is that Division 2 erred by not finding his motion for contempt had merit and erred in not recognizing that Raluca "persists in a course of action involving lawyers' services that [are] . . . fraudulent, or even criminal. . . ." (See Amended Petition at 18-20).

3.30. On February 15, 2018, this Court provided a letter order granting Petitioner's Amended Motion to Extend Time to File Petition for Review; however, this Court also stated, in pertinent part:

> Both the second amended motion for extension to file petition for review and the untimely petition for review have set for consideration without oral argument by a department of the court. If the Court does not grant the motion for an extension of time, the amended petition will not be considered by the Court. If the Court grants the motion for an extension, then the Court will proceed to consider the amended petition for review.
> ***
> The Respondent may serve and file an answer to the second amended motion to extend time and the amended petition for review by March 19, 2018.

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4. ARGUMENT

4.1. Grigore's Petition for Review is Untimely.

Rule of Appellate Procedure 12.3 provides that motion to publish must be filed within 20 days of the entry of a court of appeals decision:

> (e) Motion To Publish. A motion requesting the Court of Appeals to publish an opinion that had been ordered filed for public record should be served and filed within 20 days after the opinion has been filed.

RAP 12.3. Likewise, a motion for reconsideration must also be filed within 20 days:

> (a) Generally. A party may file a motion for reconsideration only of a decision by the judges (1) terminating review. . . .
>
> (b) Time. The party must file the motion for reconsideration within 20 days after the decision the party wants reconsidered is filed in the appellate court.

RAP 12.4. A petition for review by the Supreme Court must be filed within 30 days of the entry of the court of appeals decision, or within 30 days after a timely motion for reconsideration or timely motion to publish:

> (a) How to Seek Review. A party seeking discretionary review by the Supreme Court of a Court of Appeals decision terminating review must serve on all other parties and file a petition for review. . . . A petition for review should be filed in the Court of Appeals. If no motion to publish or motion to reconsider all or part of the Court of Appeals decision is timely made, a petition for review must be filed within 30 days after the decision is filed. If such a motion is made, the petition for review must be filed within 30 days after an order is filed denying **a timely motion for reconsideration or determining a timely motion to publish**. . . .

RAP 13.4 (emphasis added). Courts of appeal, except in rare cases, do not extend such time limits provided by the Rules of Appellate Procedure:

> (b) Restriction on extension of time. The appellate court will only in extraordinary circumstances and to prevent a gross miscarriage of justice extend the time within which a party must file a notice of appeal, a notice for discretionary review, a motion for discretionary review of a decision of the Court of Appeals, a petition for review, or a motion for reconsideration. The appellate court will ordinarily hold that the desirability of finality of decisions outweighs the privilege of a litigant to obtain an extension of time under this section. The motion to extend time is determined by the appellate court to which the untimely notice, motion or petition is directed.

RAP 18.8; Reichelt v. Raymark Indus., 52 Wn. App. 763, 764 P.2d 653 (1988) (noting that the RAP 18.8(b) standard is rarely satisfied).

Here, Division 2 issued its unpublished decision on September 26, 2017. (Unpublished Decision). Thus, a motion to publish or reconsideration was due, 20 days later, on October 16, 2017. See RAP 12.3; RAP 12.4. Instead of filing a timely motion to publish or reconsideration, Grigore filed a Motion for Extension of Time to File the Motion for Reconsideration on October 26, 2017.

This was a week after a reconsideration motion was due.

On October 30, 2017, Grigore filed a Motion to Reconsider, and on November 1, 2017, he filed an Amended Motion to Reconsider. Without stated reasons, Division 2 denied his reconsideration on November 16,

2017.

The obvious reason why Division 2 denied reconsideration was that neither the motion nor amended motion for reconsideration was brought timely. See RAP 12.4; Reichelt, 52 Wn. App. 763. By logical deduction, and process of elimination, the only other reason that reconsideration was denied was because it lacked merit; Division 2 already ruled his appeal was frivolous.

Regardless, no petition for review was timely filed because the motion for reconsideration was not timely filed. See RAP 12.4; RAP 13.4. Furthermore, Grigore's motion to publish was not timely filed either, and it cannot provide a basis for his petition for review to be timely either. See RAP 12.3; RAP 13.4.

Accordingly, Grigore's petition for review and amended petition for review are untimely and this Court need not examine the merits of either at all. See RAP 13.4; Reichelt, 52 Wn. App. 763.

4.2. Grigore's Petition for Review Lacks Merit.

As a threshold matter, it is important to note that the trial court granted CR 11 sanctions against Grigore because his motion for contempt lacked merit and was brought to harass and impoverish Raluca. Division 2 subsequently ruled that Grigore's appeal of the trial court's decision was frivolous. It should then be unsurprising that his petition for review is also

without merit.

4.2.1. Division 2 Correctly Reviewed the Trial Court's Findings for Substantial Evidence.

Contempt is generally defined as the intentional "disobedience of any lawful judgment, decree, order, or process of the court." King v. Department of Social and Health Servs., 110 Wash. 2d 793, 797, 756 P.2d 1303 (1988). Punishment for contempt is within the sound discretion of the trial court. In re Marriage of Humphreys, 79 Wash. App. 596, 903 P.2d 1012 (1995).

A trial court's decision in a contempt proceeding is reviewed for an abuse of discretion. In Re the Marriage of Williams, 156 Wn. App. 22, 27, 232 P.3d 573 (2010). As long as the trial court's findings of fact are supported by substantial evidence, they will not be disturbed on appeal. In re Marriage of Rockwell, 141 Wn. App. at 242. Evidence is substantial if it exists in a sufficient quantum to persuade a fair-minded person of the truth of the declared premise. In re Marriage of Burrill, 113 Wn. App. 863, 868, 56 P.3d 993 (2002).

Court Rule 52(a)(2)(B) requires the trial court to enter findings of fact in domestic relations cases, including trial by affidavit. See CR 52; In re Marriage of Stern, 68 Wn. App. 922, 928-29, 846 P.2d 1387 (1993). In Marriage of James, the court stated, "Because we reverse on other grounds,

we do not reach the issue of *whether substantial evidence supports the trial court's contempt orders*." 79 Wn. App. 436, 445, 903 P.2d 470, 472 (1995) (emphasis added).

Here, Grigore appears to challenge Division 2's decision to review the trial court's findings based on substantial evidence. Division 2 followed the correct standard of review, and Grigore's petition therefore has no merit.

The trial court made factual findings based on the declarations and documents presented by the parties. It heard the argument of the parties at multiple hearings, and it made appropriate findings and conclusions when denying his contempt motion and issuing sanctions.

Division 2, held that "although a contempt proceeding is not technically a trial by affidavit" substantial evidence is the proper standard to determine whether the trial court abused its discretion. This Court agrees. See In re Marriage of James, 79 Wn. App. at 440 ("we do not reach the issue of *whether substantial evidence supports the trial court's contempt orders*.") (emphasis added).

Accordingly, Division 2's opinion was proper, based on established law, and it does not conflict with decisions of this Court.

4.2.2. Division 2 Correctly Affirmed the Trial Court's Ruling that It Lacked Jurisdiction Over the Parties' Children.

Subject matter jurisdiction is "the authority of the court to hear and

determine the class of actions to which the case belongs." In re Adoption of Buehl, 87 Wn.2d 649, 655, 555 P.2d 1334 (1976). A superior court always has jurisdiction to determine whether it has subject matter jurisdiction and whether it should exercise its jurisdiction. In re Marriage of Kastanas, 78 Wn. App. 193, 201, 896 P.2d 726, 730 (1995). Washington courts have jurisdiction over children when they have resided in the state for six months and another jurisdiction does not have jurisdiction over them. See RCW 26.27.201.

Here, during the summer of 2009, the parties' children moved to Canada, where they have resided ever since. (CP at 71-72, Canadian Order). A year later, Raluca filed for dissolution in Washington. (CP at 6-15, Petition). In her petition, she acknowledged that Canadian courts had jurisdiction over the parties' children. (CP at 6-15, Petition). Grigore did not contest the dissolution proceedings and signed the joinder on her petition. (CP at 6-15, Petition). The parties' final decree of dissolution was agreed and explicitly acknowledged the Washington trial court "ha[d] no jurisdiction [over the parties' children] as they reside in Canada with father." (CP at 35-41, Decree of Dissolution).

Further, at the presentation hearing for this final order, Grigore specifically acknowledged that Canadian courts had jurisdiction over the parties' children:

> THE COURT: The decree indicates this Court has no jurisdiction over the children as they reside in Canada.
>
> [GRIGORE]: That's correct. . . .

RP (August 6, 2010) at 6).

Later, starting in 2013, Grigore fully litigated—at all levels of the Canadian court system—all issues regarding the parties' children in Canada. (CP at 63-81, Canadian Order). Not until 2015—after it was clear that he would not be granted the relief he wanted by Canadian courts—Grigore brought suit regarding the parties' children in Washington. (CP at 43-47, Motion for Contempt).

Thus, contrary to Grigore's claims against Raluca of "forum shopping"—Grigore is the only party that ever engaged in forum shopping. Moreover, his reversal in positions should not be tolerated. See Svatonsky v. Svatonsky, 63 Wn.2d 902, 905, 389 P.2d 663, 665 (1964) (holding party's reversal of jurisdictional arguments could not be tolerated).

Accordingly, the trial court was not in error when it found that it did not have jurisdiction regarding the parties' children and that no basis, or order, existed for which Raluca could be held in contempt. See RCW 26.27.201; In re Marriage of James, 79 Wn. App. at 445; In re Adoption of Buehl, 87 Wn.2d at 655. All such findings were well supported under any level of review. There is no reason for this Court to accept review.

4.2.3. Grigore's Appeal Does Not Raise Significant Questions of Law and Policy Under the Constitution of the United States.

The Revised Code of Washington Section 4.24.820 provides the following in pertinent part:

> (1) Washington's courts, administrative agencies, or any other Washington tribunal shall not recognize, base any ruling on, or enforce any order issued under foreign law, or by a foreign legal system, that is manifestly incompatible with public policy.
>
> (2) For purposes of this chapter, a foreign law, an order issued by a foreign legal system or foreign tribunal is presumed manifestly incompatible with public policy, when it does not, or would not, grant the parties all of the same rights, or when the enforcement of any order would result in a violation of any right, guaranteed by the Washington state and United States Constitutions.

Here, Grigore makes an argument that Division 2 erred by not recognizing that his appeal raised significant policy questions and violations to the United States Constitution. He appears to claim, by citing RCW 4.24.820, that the trial court and/or Division 2 should not have recognized Canadian courts had proper jurisdiction over the parties' children. (See Amended Petition at 16-18).

This argument is also frivolous. The children resided in Canada, and as a matter of law, Washington State did not have jurisdiction over the children. See RCW 26.27.201. Furthermore, and unsurprisingly, Grigore agreed that Canada had jurisdiction over the children when the trial court,

presiding over the dissolution, asked him.

Without jurisdiction over the children, or an order for which Raluca could be held in contempt, Grigore had no basis even to attempt to hold Raluca in contempt.

Accordingly, no reasonable argument can implicate RCW 4.24.820, and there are no concerns, issues, policies, or constitutional matters that this Court needs to review. Grigore's petition should be denied.

4.2.4. Division 2 Correctly Affirmed the Trial Court's Award of CR 11 Sanctions and Correctly Granted Fees on Appeal.

An appellate court reviews an award of Rule 11 sanctions for abuse of discretion. Marina Condo. Homeowner's Ass'n v. Stratford at Marina, LLC, 161 Wn. App. 249, 263, 254 P.3d 827, 833 (2011). A trial court abuses its discretion if its order is manifestly unreasonable or is based on untenable grounds. Id.

Division 2 held that the reasons for which the trial court sanctioned Grigore were not an abuse of discretion. This holding was well supported as Grigore's contempt motion lacked any reasonable basis in law or fact and was designed to harass and impoverish Raluca. (Unpublished Opinion at 20-22). Division 2 also held that the trial court did not violate Grigore's due process rights with the process it followed in sanctioning him. This holding was also well supported and reasoned as Grigore was "expressly

notified of the proceedings regarding fees" and the trial court allowed him a "week to reply on the issue of fees." (Unpublished Opinion at 23).

In his petition for review, Grigore appears to claim that Division 2 erred by not finding his motion for contempt had merit and erred in not recognizing that Raluca "persist[ed] in a course of action involving lawyers' services that [were] . . . fraudulent, or even criminal. . . ." (See Amended Petition at 18-20).

These inflammatory accusations have no merit and provide no reason for this Court to grant Grigore's petition. Grigore joined Raluca's dissolution petition and agreed on the record that Canada had jurisdiction over the children. He then fully litigated claims regarding the children in Canada. Only after losing in Canada did Grigore attempt to hold Raluca for contempt by arguing Washington had jurisdiction over the children and that somehow Raluca violated the dissolution decree. In other words, the only person "persist[ing] in a course of action" that was unreasonable was—and is now—Grigore.

Accordingly, neither Grigores' original arguments on appeal or new inflammatory arguments that Raluca and undersigned counsel have taken "criminal" actions defending against his frivolous motion, filings, and appeal hold any water. Certainly, review by this Court is unnecessary, and a waste of judicial resources.

5. MOTION FOR FEES AND SANCTIONS

Rule of Appellate Procedure 18.8 provides the following in pertinent part:

> (a) Sanctions. The appellate court on its own initiative or on motion of a party may order a party or counsel . . . who uses these rules for the purpose of delay, files a frivolous appeal, or fails to comply with these rules to pay terms or compensatory damages to any other party who has been harmed by the delay or the failure to comply or to pay sanctions to the court.

Here, Grigore, in October of 2017, began filing late motions for reconsideration, late motions for publishing Division 2's decision, and late petitions for review by this Court. All of which were amended at least once. Grigore has also moved for multiple extensions of time and prevented a mandate from being entered in this case for months. Raluca has had to expend attorney fees consistently since October of 2017. These fees are in addition to fees she incurred for responding to Grigore's frivolous appeal, and in addition to fees she incurred at the trial court.

Considering that the trial court found Grigore's motion for contempt sanctionable under CR 11 because it was brought to further impoverish Raluca, and considering his appeal was frivolous, it is appropriate for this Court to issue an order compensating Raluca for moneys she has had to expend since October of 2017, after Division 2 filed its opinion; nothing Grigore has done since Division 2 filed its opinion is remotely based in law and Raluca should not bear the financial burden of her spiteful ex's

unjustified actions. See RAP 18.8.

Accordingly, Raluca formally requests an order granting her attorney fees since the court of appeals decision was filed.

Respectfully submitted, this 6th day of March, 2018,

Drew Mazzeo WSBA No. 46506
Attorney for Respondent

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Answer on Appellant, Grigore Vetrici, via email, at 98gvlaw@outlook.com on this 6th day of March, 2018.

Stacia Smith

TAYLOR LAW GROUP, P.S.

March 06, 2018 - 1:33 PM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	95327-9
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