

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
1/25/2019 11:38 AM  
BY SUSAN L. CARLSON  
CLERK

Answer/Objection to Petition for Review

No. 96256-1

SUPREME COURT OF THE STATE OF WASHINGTON

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Angela Sanderson n/k/a Angela Bovo, Appellant

v.

Zane Sanderson

Court of Appeals, Division I No. 76466-7-1

---

ANSWER OF RESPONDENT TO PETITION FOR REVIEW

---

KIRSTYN PALMISANO, WSBA #41386  
ATTORNEY FOR RESPONDENT  
544 29<sup>TH</sup> AVE, SEATTLE, WA 98122

ANGELA BOVO  
PRO SE APPELLANT  
222 S.W. 292 STREET  
FEDERAL WAY, WA 98023

TABLE OF CONTENTS

I. TABLE OF AUTHORITIES.....ii

II. STATEMENT OF FACTS: OBJECTION TO RESPONSE DEADLINE BASED ON LACK OF SERVICE OF PETITION.....1

III. ARGUMENT.....1

IV. CONCLUSION.....1

TABLE OF AUTHORITIES

WASHINGTON STATUTES

RAP 13.....1

#### A. STATEMENT OF FACTS – OBJECTION DUE TO LACK OF SERVICE

Ms. Bovo filed a motion for discretionary review on November 6<sup>th</sup>, 2017 under cause number 76466-7, Court of Appeals Division I. See Exhibit A. Five documents were listed including a Petition for Review with the note “The Original File Name was Relocation Trial.pdf”. The document received by counsel for Respondent titled “Relocation Trial” is attached as Exhibit B. This document is not a petition, but the Final Order and Findings from the relocation trial which occurred in the Superior Court.

On November 27<sup>th</sup>, 2018, counsel for Mr. Sanderson received a notice of filing with the Supreme Court which contained notice that the following three documents had been filed: “Financial GAL issues biased”, “Letter re Psychiatric Eval 6-5-15” and “Unenforceable Order”. See Exhibit C. On December 26<sup>th</sup>, 2018, counsel for Respondent received a letter from the Supreme Court dated December 26<sup>th</sup>, 2018, which stated that deadline for submitting an answer to the Petition for Review is January 25<sup>th</sup>, 2019. See Exhibit D. A review of the case file shows that a “Petition for Review” was filed under case number 96256-1 on September 4<sup>th</sup>, 2018. It was not until the December 26<sup>th</sup>, 2018 letter was received that counsel was made aware that a Petition had been filed with the Supreme Court.

Counsel for Respondent has not been served with the Petition filed with the Supreme Court on September 4<sup>th</sup>, 2018. The Notice of Filing dated November 6<sup>th</sup>, 2017, misidentifies a document filed with the Appellate Court as a “Petition”, causing further confusion. It is unclear if the September 4<sup>th</sup>, 2018 Petition is a new document or if it is a document originally filed with the Appellate Court that has been re-filed with the Supreme Court. If it is a document previously filed with the Appellate Court, counsel for Respondent cannot identify which document has been refiled as the petition.

#### B. RULES OF APPELATE PROCEDURE 13.4

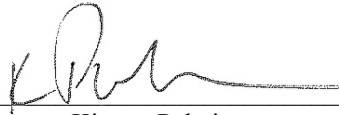
RAP 13.4 (a) requires a party seeking discretionary review by the Supreme Court to “serve on all other parties” their petition for review. Ms. Bovo has failed to serve this petition on Respondent. A review of the Appellate Court documents shows one document labeled as a “petition” which is misidentified. Respondent cannot comply with RAP 13.4(d) and submit a sufficient answer or reply when he cannot identify the document he is responding to.

C. CONCLUSION

Ms. Bovo should be instructed to cure this defect in a timely manner or the matter should be dismissed.

January 25<sup>th</sup>, 2019

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Palmisano', is written over a horizontal line.

Kirstyn Palmisano

Attorney for Respondent

Washington State Bar Association Membership Number 41386

APPENDIX

Exhibit A: Notice of Filing in Court of Appeals date November 6<sup>th</sup>, 2017

Exhibit B: Document titled "Relocation Trial" filed with Court of Appeals on November 6<sup>th</sup>, 2017

Exhibit C: Notice of Filing in Superior Court dated November 27<sup>th</sup>, 2018

Exhibit D: Letter sent by Washington State Supreme Court on December 26<sup>th</sup>, 2018

# EXHIBIT A

V. FREITAS LAW, PLLC

---

544 29th Ave Seattle, Washington 98122 | tel• (206)328-7362 | fax• (206)323-0404

FILED  
Court of Appeals  
Division I  
State of Washington  
11/6/2017 3:41 PM

Page 1 of 5

Superior Court of Washington, County of KING

In re:

Petitioner/s (as listed on the parenting/custody order):

ANGELA BOYO

And Respondent/s (as listed on the parenting/  
custody order):

ZANE SANDERSON

No. 10-3-05248-1 SEA

Final Order and Findings on Objection  
about Moving with Children and Petition  
about Changing a Parenting/Custody  
Order (Relocation)

(ORDYMT or ORGRRE)

Clerks' action required: 1, 12

**Final Order and Findings on Objection about Moving  
with Children and Petition about Changing a  
Parenting/Custody Order (Relocation)**

**1. Money Judgment Summary**

No money judgment is ordered.

**2. This Order is based on the court's decision about the Objection after a contested trial on  
January 17, 18, and 19, 2017.**

The following people were at the trial:

Petitioner: Angela Boyo

Respondent: Zane Sanderson

Respondent's attorney: Veronica Freitas

Kim Sanderson, Respondent's spouse

**> Findings & Conclusions**

**3. Jurisdiction over the child (RCW 26.27.201 - .221, .231, .251, .271)**

The court can decide this case for the child because:

**Exclusive, continuing jurisdiction** - A Washington court has already made a  
parenting plan, residential schedule or custody order for the child, and the court  
still has authority to make other orders for Zane Basil Sanderson.





**Home state jurisdiction** – Washington is the child's home state because:

Zane Bazil Sanderson lived in Washington with a parent or someone acting as a parent for at least the 6 months just before this case was filed, or if the child was less than 6 months old when the case was filed, he has lived in Washington with a parent or someone acting as a parent since birth.

Zane Bazil Sanderson does not have another home state.

#### 4. Factors for / against move with child

Based on the factors listed below, the Court concludes that the planned move would not cause more harm to the child than good to the child and the parent (or non-parent custodian) who wants to move.

- a. **Relationships:** The child's relationships with each parent, any siblings, and other important people in the child's life. (*Findings about the strength, nature, quality, extent of involvement, and stability of the child's relationships and how those would be affected by the planned move*):

This factor favors allowing Bazil to move with his father since his father is his primary caretaker and provides all of the stability in Bazil's life. Bazil's contact with his mother has been intermittent over the last two years. The move will also place Bazil in close contact with one set of grandparents and near an aunt. It will place him farther away from his maternal relatives, but he does not have a close relationship with them.

- b. **Agreements:** *Findings:* There was a tacit agreement between the parents/custodian about moving with the child.

This factor favors allowing Bazil to relocate with his father. The father was clear with Ms. Bovo, from when they first started dating, that he intended to ultimately return to the Cook Islands. He took Ms. Bovo there a few months after they were married and they intended to move there at some point in the future, though no definite date for such a move was set.

- c. **Contact:** *Findings:* Disrupting the child's contact with the moving parent (or non-parent custodian) would be more harmful to them than disrupting their contact with the non-moving parent.

This factor favors allowing Bazil to move with his father. Mr. Sanderson provides the essential stability to Bazil's life; disrupting that stable relationship would be devastating to Bazil. Disrupting Bazil's relationship with his mother will not have much of a negative effect on him. While he will certainly miss the good times he has had with his mother, he will also be spared all the marital acrimony and aggressive conflict Ms. Bovo has with nearly everyone, including Mr. Sanderson. Ms. Bovo's continuing, unacknowledged mental health issues have resulted in homelessness, lack of self-control, and inappropriate boundaries with most other people.

- d. **Limitations:** *Findings:* The current parenting/custody order includes limitations under RCW 26.09.191 on a parent (or non-parent custodian).

Ms. Bovo was found in the 2015 parenting plan to be subject to two such limitations: 1) a long-term physical or mental impairment which interfered with parenting functions and 2) engaging in abusive use of conflict. Both of these limitations still exist and have a great adverse impact on Ms. Bovo as a parent.



- e. **Reasons for moving:** *Findings:* The reasons for moving were given in good faith. Mr. Sanderson has excellent reasons for moving to the Cook Islands. The islands are his home, he promised to return there pursuant to the scholarship he obtained to go to college, and he needs to care for his aging parents.
- f. **Reasons for objecting:** *Findings:* The reasons for objecting to the move were given in good faith. Ms. Bovo has opposed the move in good faith because she does not want to have her time with Bazil diminished, but it would be in Bazil's best interests to have less time with his mother in order to reduce the conflict between the parents.
- g. **Child:** *Findings:* Allowing or preventing the move would affect the child's physical, educational, and emotional development, considering their age, developmental stage, and needs (including any special needs) as follows: This is a good time in Bazil's life to make such a move. He has moved twice in the last three years so he does not have a longstanding relationship with a current school or community. Moving now allows him to become established in a new school system before entering middle school. Bazil shall maintain his relationship with his mother via regular skype calls, phone calls and emails and regular visits with her in the Cook Islands.
- h. **Quality of life:** The quality of life, resources and opportunities available to the child and the moving parent (or non-parent custodian) in the current location and in the new location. Findings: This factor is neutral. While Seattle has more cultural opportunities, the Cook Islands have more year round outdoor recreation and a tighter knit community, with very little crime or drug problems.
- i. **Other arrangements:** Other arrangements available to foster and continue the non-moving parent's relationship and contact with the child. Findings: Ms. Bovo can contact Bazil over the internet and can visit him in the Cook Islands.
- j. **Alternatives:** Alternatives to the planned move, and whether it is possible or desirable for the non-moving parent to move too. Findings: This factor favors relocation as there are no other alternatives to the father relocating to the Cook Islands. It is not possible for his parents to move from the Cook Islands/New Zealand. They are in dire need of support and assistance and there is no one else who is able to provide them with the support and assistance that they need. The father has housing, employment and transportation available to him in the Cook Islands. The mother does not desire to move to the Cook Islands and it may not be possible for her to relocate to the Cook Islands.
- k. **Financial:** The financial impact and logistics of moving or not moving (for example, the timing, cost, and how the move would happen). Findings: Because of the cost of airfare, the frequency of in person visitation between Bazil and his mother will have to be reduced. The father has housing available at no cost and a job waiting for him in the Cook Islands. The father must relocate in January so that he can begin working and so that the child can begin attending school as the academic school year begins in January.



**5. Changes to parenting/custody order**

**Change** – There are valid reasons to change the parenting/custody order because the court is allowing the child to move and the changes are in the child's best interest considering the move. The new *Parenting Plan* or *Residential Schedule* does not change the parent with whom the child lives most of the time.

**6. Child Support**

Does not apply.

**7. Protection Order**

No one requested an *Order for Protection* in this case.

**8. Restraining Order**

No one requested a *Restraining Order* in this case.

**9. Fees and Costs**

Each party should pay his/her own fees and costs.

**10. Other findings, if any**

➤ **Court Orders**

**11. Decision**

**Move with child**

Allowed – The child may move with Zane Sanderson as requested.

**Parenting/custody order**

**Change** – The court signed the new *Parenting Plan* or *Residential Schedule* filed separately on January 20, 2017.

**Child Support**

No Change – The current child support order remains in effect.

**Protection or Restraining Order**

Does not apply.

**12. Money Judgment (summarized on page 1)**

No money judgment is ordered.

**13. Other orders, if any**

Ordered.

January 20, 2017  
Date

Douglas A. North  
Judge or Commissioner



**ANGELA BOVO - FILING PRO SE**

**November 06, 2017 - 3:41 PM**

**Transmittal Information**

**Filed with Court:** Court of Appeals Division I  
**Appellate Court Case Number:** 76466-7  
**Appellate Court Case Title:** In re: Angela Sanderson n/k/a Bovo, Appellant v. Zane Sanderson, Respondent  
**Superior Court Case Number:** 10-3-05248-1

**The following documents have been uploaded:**

- 764667\_Affidavit\_Declaration\_20171106151907D1961728\_0280.pdf  
This File Contains:  
Affidavit/Declaration - Service  
*The Original File Name was service 11.6.2017.pdf*
- 764667\_Financial\_20171106151907D1961728\_9148.pdf  
This File Contains:  
Financial - Other  
*The Original File Name was Bovo Pauperis.pdf*
- 764667\_Motion\_20171106151907D1961728\_6590.pdf  
This File Contains:  
Motion 1 - Waive - Filing Fee  
*The Original File Name was Appeal Waiver.pdf*
- 764667\_Other\_20171106151907D1961728\_6782.pdf  
This File Contains:  
Other - Appellate Brief  
*The Original File Name was Relocation Appeal.pdf*
- 764667\_Petition\_for\_Review\_20171106151907D1961728\_0457.pdf  
This File Contains:  
Petition for Review  
*The Original File Name was Relocation Trial.pdf*

**A copy of the uploaded files will be sent to:**

- v@vfreitaslaw.com

**Comments:**

---

Sender Name: Angela Bovo - Email: angbovo@gmail.com  
Address:  
222 SW 292 ST  
Federal WAY, WA, 98023  
Phone: (425) 753-1966

**Note: The Filing Id is 20171106151907D1961728**

# EXHIBIT B

V. FREITAS LAW, PLLC

---

544 29th Ave Seattle, Washington 98122 | tel• (206)328-7362 | fax• (206)323-0404





Superior Court of Washington, County of KING

In re:

Petitioner/s (as listed on the parenting/custody order):

ANGELA BOYO

And Respondent/s (as listed on the parenting/  
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**6. Child Support**

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**7. Protection Order**

No one requested an *Order for Protection* in this case.

**8. Restraining Order**

No one requested a *Restraining Order* in this case.

**9. Fees and Costs**

Each party should pay his/her own fees and costs.

**10. Other findings, if any**

➤ **Court Orders**

**11. Decision**

**Move with child**

Allowed – The child may move with Zane Sanderson as requested.

**Parenting/custody order**

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**Child Support**

No Change – The current child support order remains in effect.

**Protection or Restraining Order**

Does not apply.

**12. Money Judgment (summarized on page 1)**

No money judgment is ordered.

**13. Other orders, if any**

Ordered.

January 20, 2017  
Date

Douglas A. North  
Judge or Commissioner

# EXHIBIT C

V. FREITAS LAW, PLLC

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544 29th Ave Seattle, Washington 98122 | tel• (206)328-7362 | fax• (206)323-0404

**ANGELA BOVO - FILING PRO SE**

**November 27, 2018 - 2:14 AM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 96256-1  
**Appellate Court Case Title:** Angela Sanderson n/k/a Angela Bovo v. Zane Sanderson  
**Superior Court Case Number:** 10-3-05248-1

**The following documents have been uploaded:**

- Financial GAL issues biased.pdf  
This File Contains:  
Exhibit
- Letter re Psychiatric Eval 6-5-15.pdf  
This File Contains:  
Letters/Memos - Other
- Unenforceable Order.pdf  
This File Contains:  
Other - Minute Judge Keane

**A copy of the uploaded files will be sent to:**

- v@vfreitaslaw.com

**Comments:**

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Sender Name: Angela Bovo - Email: angbovo@gmail.com  
Address:  
po box 257  
Seattle, WA, 98105  
Phone: (425) 753-1966

**Note: The Filing Id is 20181127021251SC575023**

# EXHIBIT D

V. FREITAS LAW, PLLC

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544 29th Ave Seattle, Washington 98122 | tel• (206)328-7362 | fax• (206)323-0404



SUSAN L. CARLSON  
SUPREME COURT CLERK

ERIN L. LENNON  
DEPUTY CLERK/  
CHIEF STAFF ATTORNEY

# THE SUPREME COURT

STATE OF WASHINGTON



TEMPLE OF JUSTICE

P.O. BOX 40929  
OLYMPIA, WA 98504-0929

(360) 357-2077  
e-mail: [supreme@courts.wa.gov](mailto:supreme@courts.wa.gov)  
[www.courts.wa.gov](http://www.courts.wa.gov)

December 26, 2018

## LETTER SENT BY E-MAIL ONLY

Angela Marie Sanderson n/k/a Bovo  
222 S.W. 292 Street  
Federal Way, WA 98023

Veronica A. Freitas  
V. Freitas Law PLLC  
544 29th Avenue  
Seattle, WA 98122-6220

Re: Supreme Court No. 96256-1 - Angela Sanderson n/k/a Angela Bovo v. Zane Sanderson  
Court of Appeals No. 76466-7-I

Counsel and Ms. Bovo:

On December 24, 2018, this Court received the \$200 filing fee (check #013898075) in the above referenced case.

The petition for review will be set for consideration without oral argument by a Department of the Court; see RAP 13.4(i). If the members of the Department do not unanimously agree on the manner of the disposition, consideration of the petition will be continued for determination by the En Banc Court.

The Respondent is advised that any answer to the petition for review may be served and filed with this Court by January 25, 2019. The parties are directed to review the provisions set forth in RAP 13.4(d), regarding the filing of any answer to petition for review and any reply to answer.

Usually there is approximately three to four months between receipt of the petition for review in this Court and consideration of the petition. This amount of time is built into the process to allow an answer to the petition and for the Court's normal screening process. At this time it is not known on what date the matter will be determined by the Court. The parties will be advised when the Court makes a decision on the petition.


Any amicus curiae memorandum in support of or in opposition to a pending petition for review should be served and received by this Court and counsel of record for the parties and



Page 2  
No. 96256-1  
December 26, 2018

other amicus curiae by not later than 60 days from the date the petition for review was filed; see RAP 13.4(h).

Sincerely,

A handwritten signature in black ink, appearing to read "Erin L. Lennon". The signature is fluid and cursive, with a prominent initial "E" and a long, sweeping horizontal stroke.

Erin L. Lennon  
Supreme Court Deputy Clerk

ELL:sk

**V. FREITAS LAW PLLC**

**January 25, 2019 - 11:38 AM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 96256-1  
**Appellate Court Case Title:** Angela Sanderson n/k/a Angela Bovo v. Zane Sanderson  
**Superior Court Case Number:** 10-3-05248-1

**The following documents have been uploaded:**

- 962561\_Answer\_Reply\_Reply\_Plus\_20190125113721SC358029\_9978.pdf  
This File Contains:  
Answer/Reply - Answer to Petition for Review  
Certificate of Service  
*The Original File Name was Response to Petition Combined.pdf*

**A copy of the uploaded files will be sent to:**

- Kirstyn@vfreitaslaw.com
- amy@vfreitaslaw.com
- angbovo@gmail.com
- chris@vfreitaslaw.com
- v@vfreitaslaw.com
- valerie@vfreitaslaw.com

**Comments:**

---

Sender Name: Chris Tapuro - Email: chris@vfreitaslaw.com

**Filing on Behalf of:** Kirstyn Palmisano - Email: Kirstyn@vfreitaslaw.com (Alternate Email: )

Address:  
544 29th Ave  
Seattle, WA, 98122  
Phone: (206) 328-7362

**Note: The Filing Id is 20190125113721SC358029**