98564-2
Court of Appeal Cause No. 81043-0-1

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

Debbie Moeller, nka, Debbie Schultz
Respondent

v.

Michael Moeller
Appellant

PETITION FOR REVIEW

Michael Moeller
Pro Se
7703 12th Ave E.
Tacoma, WA 98404
(253) 576-5804

TABLE OF CONTENTS

TABLE OF AUTHORITIES……..……..3

IDENTITY OF PETITIONER……...…….…….4

COURT OF APPEALS DECISION……..…….....4

ISSUE PRESENTED FOR REVIEW …….……..….4

STATEMENT OF THE CASE …….....4,5

ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

1. Whether requiring a responsible party who is current on their monthly child support obligation and subject to RCW 26.18.090 wage garnishment should be required to pay more than fifty percent of their exempt earned income towards child support arrears?.....5,6

2. Whether Reconciliation shall be an affirmative defense allowing for credit and or removal of support arrears that accrued during a period of Reconciliation?..... 6,7,8

CONCLUSION……8

TABLE OF AUTHORITIES

STATUTES

RCW 26.18.090……4,6

RCW 26.19.001……...7

RULES

RAP 13.4……...5,6

OTHER AUTHORITIES

Dooley v. Dooley, 443 So.2d 30, 631 (3rd Cir. 1983)…….7

Commissioner of Social Services of City of New York on Behalf of Galasso v. Galasso, 441 N.Y.S.2d40, at 41 (Fam Ct. 1981)……7

Jackson v. Jackson, 187 S.E.2d 490, 493 (1972)…….7

Thomas v Thomas, 565 P.2d 722, (Div. 2 1976)…….7

A. IDENTITY OF PETITIONER

Michael Moeller, Appellant asks this Court to accept review of the Court of Appeals decision terminating review designated in Part B of this petition.

B. COURT OF APPEALS DECISION

Mr. Moeller seeks review of the Court of Appeals opinion filed April 20, 2020. A copy of the decision is in the Appendix at pages A-1 through A-9.

C. ISSUES PRESENTED FOR REVIEW

1. Whether requiring a responsible party who is current on their monthly child support obligation and subject to RCW 26.18.090 wage garnishment should be required to pay more than fifty percent of their exempt earned income towards child support arrears?

2. Whether reconciliation shall be an affirmative defense allowing for credit and or removal of support arrears that accrued during a period of reconciliation?

D. STATEMENT OF THE CASE

The facts as recited in the Court of Appeals opinion:

> *Michael Moeller and Debbie Schultz separated in November of 2003 and dissolved their marriage in May of 2004. At the time, they had two children. Moeller was required to pay $782.87 per month in child support, and Schultz sought help from the Department of Social and Health Services (DSHS) to obtain child support from him. In 2007, Schultz moved to hold Moeller in contempt of court for failing to pay child support. The court reduced his monthly child support payment to $500 per month, found him in contempt, and entered a judgment for $19,675.83 in child support arrears and an additional $3,047.57 in interest. The 2007 judgment provides for post-judgment interest at 12 percent per annum.*
>
> *Moeller and Schultz soon reconciled and had another child in 2008. The reconciliation did not last, however, and in January of 2013, Schultz again sought help from DSHS because Moeller was not paying child support for their youngest child. After determining Moeller was voluntarily*

> *unemployed, a DSHS hearing officer concluded he was $1,423.21 in arrears for nonpayment of support for their youngest child. Moeller was now required to pay $751 per month in child support: $250 per month for each of his older children and $251 per month for his youngest child.*
>
> *In March of 2018, Schultz again moved to hold Moeller in contempt for nonpayment of child support. She alleged he failed to pay any arrears and was still failing to meet his ongoing support obligations. In May, Commissioner Adams found Moeller in contempt because he had the ability to meet his obligations and willfully refused to do so. He determined Moeller owed Schultz $60,659.48 in arrears and $55,819.02 in interest.*
>
> *Moeller moved to revise the contempt order. Among other contentions, he argued the commissioner should have reduced the amount of arrears because his ongoing support obligation included payments for a child over 18. He also sought additional time to prove he cohabitated with Shultz between 2007 and 2012 and provided child support during that time. After a revision hearing, Judge Nelson upheld the contempt finding, reduced the amount of interest owed by $9,484.22, and provided additional time for Moeller to provide proof of cohabitation and support. Judge Nelson later denied Moeller's motion for reconsideration.*

Moreover, Moeller additionally pleads Mrs. Shultz notified Division Of Child Support (DCS) to end collection prior to the 2007 and 2018 finding of contempt, (CP 271, 291). DCS filed a lien release with the county auditor in 2010 for the judgement obtained by Mrs. Schultz in 2007, (Appendix 10). In separate litigation, Mrs. Schultz and her attorney filed a declaration in 2012 stating in part that parties reconciled, (Appendix 11) and then contradicted that filing under this cause stating in part the parties did not reconcile, (CP 333).

E. ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

1. Whether requiring a responsible party who is current on their monthly child support obligation and subject to RCW 26.18.090 wage garnishment should be required to pay more than fifty percent of their exempt earned income towards child support arrears?

This plea for review is made under 13.4.(b)(4). At the time of contempt, Moeller was paying his support through DCS wage garnishment and was current for support due for the immediate years leading into the contempt proceedings. It was later determined at

the trial court reconsideration he had overpaid on his current child support, which resulted in a credit of over $9,000.00 towards arrears owed, however Moeller was still held in contempt.

In the years prior to the courts finding of contempt, Moeller's wage garnishment was deducted biweekly at the State's maximum allowable deduction of fifty percent of earnings allowed under RCW 26.18.090. The garnishment satisfied current support and created a credit of over $9,000.00 towards arrears owed by Mr. Moeller. At the May 30, 2018 contempt hearing the commissioner found Moeller intentionally violated the courts order to pay child support, despite having the ability to comply with both. The finding of contempt was affirmed at June 15, 2018 reconsideration and again on appeal.

Moeller contends, in a contempt proceeding, it shall be defensible that a responsible party to a support order subject to maximum wage garnishment under RCW 26.18.090 who at the time of contempt is current on his support payments year to date shall not be required to pay above and beyond fifty percent of their disposable income.

Let's put it into prospective, in 2017 Moeller earned roughly $24,000.00 in wages, he had no other income and historically speaking it was a high wage-earning year for him. Wage garnishment took half that income leaving him at or around $12,000.00, which is below the 2017 federal poverty level. The facts show at the time of the contempt finding, Moeller was up to date on his support payments and was paying a minimum of $250 extra a month towards his arrears.

Essentially, requiring Moeller to pay more than fifty percent of his exempt income conflicts with the state's law regarding wage garnishment and imposes a financial struggle on Moeller that impacts his unalienable rights to life, liberty, and the pursuit of happiness. Where is the line drawn? Moeller was current and paying what he could towards the arrears, it is unfair to require him to pay more than he can afford if he is already exceeding his burden through wage garnishment.

2. Whether reconciliation shall be an affirmative defense allowing for credit and or removal of support arrears that accrued during a period of reconciliation?

This plea for review is made under 13.4.(b)(4). Marriage is complicated and for many Washingtonians unsuccessful. Washington being a no-fault state allows for dissolution even when only one party is willing to dissolve the relationship. Several factors can help contribute to a married person not wanting to end the relationship e.g. religious believes, family history, financial, social status, etc. Therefore, such a person may be vulnerable and willing to forgo their own security for the benefit of keeping the family together if the opportunity was to present itself.

History, Moeller and Schultz dissolved their marriage in 2004 by way of default. Prior to final dissolution and immediately after dissolution the couple gave it a few tries at reconciliation, however nothing long term stuck. However, Schultz contacted DCS a

few months after dissolution and ask them to end collection, (CP 271). Moeller contends, although it was brief this was the parties first real attempt at reconciliation; it helped contribute to his debt and the 2007 finding of contempt.

The parties reconciled again in 2007 up through 2012. Mrs. Schultz again contacts DCS and requests they end collection, (CP 291), and this time DCS filed a lien release in response to Mrs. Schultz request, (Appendix 10). Moeller believed the support issue was dead until the couple split in 2013 and DCS reopened the case stacking years of arrears on.

Moeller argues, the State's equitable principals seem to support the crediting of child support during periods of reconciliation. As per RCW 26.19.001, the intent of the legislator is to provide equitable support for the children not to provide a windfall for parents. However, the current laws of the State do not provide any recourse for responsible parties who incur debt as a result of reconciliation; unfortunately, allowing individuals such as Mrs. Schultz to reap a windfall of support arrears.

Sadly, the justice system is expensive and hard to navigate for the normal person. As a result, many Washingtonians fail to remove court orders that are no longer being adhered to by the parties due to confusion, cost and ease. Therefore, the Court should find that when a divorced couple/parents voluntarily reconcile essentially returning to the previous status quo of their previous relationship the support provided by means of childcare, groceries, rent, and other contributions takes place of court and administratively ordered support. Otherwise, if left unaddressed when a reconciliation fails only one party suffers the consequences of the order that was not being adhered to by both parties.

Other states have adopted this position. Louisiana has held that cohabitation of parents extinguished the basis for support. *See Dooley v. Dooley*, 443 So.2d 30, 631 (3rd Cir. 1983). New York has held that cohabitation suspends an obligation of child support, reasoning that: "the parties herein rescinded their agreement to separate and resumed cohabitation. The necessity of support order abated their reconciliation, the Respondent resuming his "natural" duty to support his child." *Commissioner of Social Services of City of New York on Behalf of Galasso v. Galasso,* 441 N.Y.S.2d40, at 41 (Fam Ct. 1981).

North Carolina has also held that reconciliation abates the child support obligation until such time that a party affirmatively reinstates it. *Jackson v. Jackson,* 187 S.E.2d 490, 493 (1972). ("if, after the order… there was a reconciliation... the necessity for the support of the two children ceased."). Under a similar theory, an Oklahoma court found that a contempt defendant should not be incarcerated were he had failed to pay child support after reconciling with the other parent and living with her. *See Thomas v Thomas,* 565 P.2d 722, (Div. 2 1976).

To Appellant's knowledge Washington case law doesn't address this equitable principal. If left unaddressed many others will continue to accrue arrears that could cause

them severe financial hardship. These days and times it's hard to keep a marriage together even harder bringing it back together. Moeller didn't want to make Schultz feel like he didn't trust her, so to not complicate things he returned to the status quo with her and without forcing removal of the Court's order. Schultz did eventually contact DCS and had them end collection in 2010 and DCS immediately filed a lien release with the County auditor. Moeller believed the issue was dead until Mrs. Schultz brought it up again in 2013.

The Court should find, that an in- tacked family is in the best interest of the children and shall allow for an affirmative reconciliation defense that will prevent windfalls for the collecting party if the reconciliation doesn't work out as expected.

F. CONCLUSION

Moeller prays for the Court to accept review and hopefully provide law that will help to protect low income people's exempt income and allow for a defense at contempt when responsible parties are currently meeting and or exceeding the financial requirements that formulated the basis of contempt.

In addition, Moeller prays the Court find that a family that remains in-tack is in the best interest of the children and allow for an equitable defense of reconciliation for individuals who incur arrears as a result of the reconciliation.

May 20, 2020

Respectfully submitted,

/s/ Michael Moeller
Michael Moeller, Appellant
Pro Se

Appendix 1-9

FILED
4/20/2020
Court of Appeals
Division I
State of Washington

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE

In the Matter of the Marriage of DEBBIE J. MOELLER, n/k/a DEBBIE J. SCHULTZ, Respondent, and MICHAEL O. MOELLER, Appellant.	)	No. 81043-0-I UNPUBLISHED OPINION

VERELLEN, J. — Michael Moeller appeals a contempt order requiring that he repay more than $60,000 in unpaid child support and more than $40,000 in interest on that debt. Moeller was first held in contempt for failing to pay child support in 2007. Moeller contends the court erred by finding him in contempt because, as a consequence of a series of wage garnishments, his employer was remitting payments based on his ongoing child support obligations. But Moeller cites no authority that a person subject to wage garnishments cannot intentionally fail to meet their past, unpaid child support obligations. He also fails to challenge the court's findings of fact determining that he had the ability to meet his support obligations and intentionally did not do so. Because the court's findings support its legal conclusions, the court did not err by finding Moeller in contempt.

Moeller also argues the court erroneously applied past overpayments to pay down the interest he owes and not the principal amount of his debt. But Moeller ignores the impact of years of nonpayment on the 2007 judgment against him. The court did not err by applying the usual rule that partial payments toward a judgment are applied first to accrued interest.

Moeller contends the court abused its discretion by not granting reconsideration of its contempt order. Because Moeller failed to present new evidence supporting reconsideration, the court did not err.

Therefore, we affirm.

FACTS

Michael Moeller and Debbie Schultz separated in November of 2003 and dissolved their marriage in May of 2004. At the time, they had two children. Moeller was required to pay $782.87 per month in child support, and Schultz sought help from the Department of Social and Health Services (DSHS) to obtain child support from him. In 2007, Schultz moved to hold Moeller in contempt of court for failing to pay child support. The court reduced his monthly child support payment to $500 per month, found him in contempt, and entered a judgment for $19,675.83 in child support arrears and an additional $3,047.57 in interest. The 2007 judgment provides for post-judgment interest at 12 percent per annum.

Moeller and Schultz soon reconciled and had another child in 2008. The reconciliation did not last, however, and in January of 2013, Schultz again sought help from DSHS because Moeller was not paying child support for their youngest

child. After determining Moeller was voluntarily unemployed, a DSHS hearing officer concluded he was $1,423.21 in arrears for nonpayment of support for their youngest child. Moeller was now required to pay $751 per month in child support: $250 per month for each of his older children and $251 per month for his youngest child.

In March of 2018, Schultz again moved to hold Moeller in contempt for nonpayment of child support. She alleged he failed to pay any arrears and was still failing to meet his ongoing support obligations. In May, Commissioner Adams found Moeller in contempt because he had the ability to meet his obligations and willfully refused to do so. He determined Moeller owed Schultz $60,659.48 in arrears and $55,819.02 in interest.

Moeller moved to revise the contempt order. Among other contentions, he argued the commissioner should have reduced the amount of arrears because his ongoing support obligation included payments for a child over 18. He also sought additional time to prove he cohabitated with Shultz between 2007 and 2012 and provided child support during that time. After a revision hearing, Judge Nelson upheld the contempt finding, reduced the amount of interest owed by $9,484.22, and provided additional time for Moeller to provide proof of cohabitation and support. Judge Nelson later denied Moeller's motion for reconsideration.

Moeller appeals.

ANALYSIS

We review a contempt order for abuse of discretion.[1] A court abuses its discretion where its decision rests on untenable factual or legal grounds.[2] A court must make factual findings that support a finding of contempt.[3]

Generally, chapter 7.21 RCW empowers a court to impose remedial sanctions after finding a party intentionally failed to follow a judgment or court order that he had the power to obey.[4] And RCW 26.18.050 empowers a court to hold a party in contempt for nonpayment of child support upon a finding of "reasonable cause to believe the obligor has failed to comply with a support or maintenance order" provided the obligor does not show he was unable to comply with the order or had made good faith efforts to comply.[5]

Moeller contends as a matter of law that no one paying child support through wage garnishment could intentionally refuse to comply with a child support order. Although Moeller regularly paid his monthly support obligations between March of 2015 and 2018, he made few payments toward his accrued interest and never made payments toward his outstanding support obligations. For example,

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[1] In re Marriage of James, 79 Wn. App. 436, 439-40, 903 P.2d 470 (1995).

[2] Id. at 440.

[3] Id.

[4] RCW 7.21.010(1)(b); RCW 7.21.030(2).

[5] RCW 26.18.050(1); see RCW 26.18.050(4) ("If the obligor contends at the hearing that he or she lacked the means to comply with the support or maintenance order, the obligor shall establish that he or she exercised due diligence in seeking employment, in conserving assets, or otherwise in rendering himself or herself able to comply with the court's order.").

Moeller made no payments at all between March 2010 and February 2013. Further, Moeller cites no authority to support his contention, and neither RCW 7.21.030(2) nor RCW 26.18.050 provides any. Both statutes authorize imposition of contempt sanctions upon a finding of intentional disobedience of a court order. The court found Moeller intentionally refused to comply with both the 2007 contempt order and the 2013 administrative child support order, despite having the ability to comply with both. He has not assigned error to any of the court's findings, so they are verities on appeal.[6] Because the trial court found Moeller intentionally disobeyed lawful orders and the findings are unchallenged, the trial court did not abuse its discretion by holding Moeller in contempt.

Moeller challenges the trial court's calculation of the amounts he owes Schultz. Judge Nelson revised the contempt order signed by Commissioner Adams to reflect Moeller's historic overpayment of support for his aged-out child from July of 2015 through March of 2018. The judge applied the overpayments to interest accrued from the 2007 contempt judgment and child support debts instead of the debts' principals.[7]

Moeller argues Washington law mandates application of child support payments "first to current obligations, then to the oldest unexpired obligation and

[6] Matter of Marriage of Rideout, 150 Wn.2d 337, 353, 77 P.3d 1174 (2003); see RAP 10.3(g) (erroneous findings of fact must be "included in an assignment of error or clearly disclosed in the associated issue pertaining thereto.").

[7] Compare CP at 391 (first contempt order finding $55,819.02 owed in interest), with CP at 576 (revised contempt order finding $46,334.80 in interest).

interest thereon."[8] He correctly states the usual rule for paying outstanding child support obligations.[9] But he ignores that his oldest unexpired obligations were consolidated into the 2007 contempt judgment. Moeller had repaid none of that judgment's principle and little of the 11 years of accrued interest[10] when, in 2018, Schultz moved to hold him in contempt for refusing to pay the child support still owing from the 2007 judgment as well as additional debts accruing since then. Thus, the court was deciding how to apportion partial payment between multiple debts.

The general rule is partial payment of a judgment debt goes first to repaying interest before being applied to the principal balance.[11] Between February 2007 and July 2015, when Moeller began overpaying, he accrued $18,888.80 in interest on the unpaid principal from the 2007 judgment.[12] Moeller had paid his current obligation from 2018 and the oldest unexpired obligations were consolidated into the 2007 judgment, so the court was free to determine how to apportion Moeller's

[8] Appellant's Br. at 7 (citing Roberts v. Roberts, 69 Wn.2d 863, 867-69, 420 P.2d 864 (1966)).

[9] See, e.g., In re Marriage of Maccarone, 54 Wn. App. 502, 505, 774 P.2d 53 (1989) (citing Roberts, 69 Wn.2d at 867-69; Kruger v. Kruger, 37 Wn. App. 329, 333, 679 P.2d 961 (1984)).

[10] CP at 13-15 (DSHS payment history showing an outstanding balance of $94,882.55 as of March 2018); at 207-215 (detailed repayment history compiled by Schultz).

[11] State v. Trask, 98 Wn. App. 690, 696, 990 P.2d 976 (2000); 44B AM. JUR. 2d, *Interest and Usury* § 56 (2018).

[12] CP at 207-15 ($19,675.83 judgment principal × .12 annual interest × 8 years).

payments between his debts.[13] Because Judge Nelson applied the correct rule for partial repayment of a judgment debt, she did not err by applying Moeller's overpayments to interest from the 2007 judgment.

Moeller also contends Judge Nelson erred by changing language defining the type of evidence required in the original contempt order to prove cohabitation. But he concedes in his reply brief that the original contempt order and the revision contempt order "share the same language."[14] Further, written rulings control over contradictory oral decisions.[15] Moeller fails to show the court erred.

Moeller argues the court improperly denied his motion for reconsideration, first, because Schultz said she would forgive his child support obligation when they cohabitated between 2007 and 2012, and second, because he submitted evidence proving he provided material and in-kind child support while they cohabitated.

We will affirm a trial court's denial of reconsideration absent a manifest abuse of discretion.[16] Reconsideration is warranted if the movant presents new material evidence that could not have been produced before the court made the decision being evaluated.[17] On the record before us, Moeller fails to show he

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[13] See Oakes Logging, Inc. v. Green Crow, Inc., 66 Wn. App. 598, 601-02, 832 P.2d 894 (1992) ("If neither party appropriates the payments to any particular part of the debt, the court will apply them 'according to its own notion of the intrinsic equity and justice of the case.'") (quoting The Post-Intelligencer Publ'g Co. v. Harris, 11 Wash. 500, 502, 39 P. 965 (1895)).

[14] Reply Br. at 7.

[15] Ferree v. Doric Co., 62 Wn.2d 561, 566-67, 383 P.2d 900 (1963).

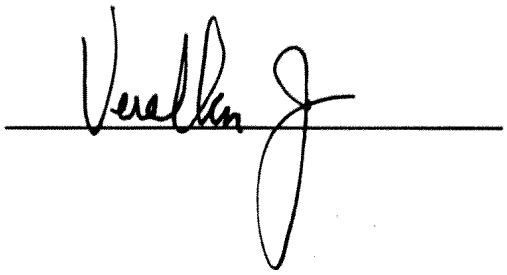
[16] In re Marriage of Tomsovic, 118 Wn. App. 96, 108, 74 P.3d 692 (2003).

[17] Id. (citing CR 59(a)(4)).

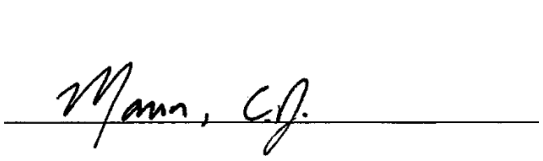
presented any new evidence for either issue on reconsideration that compelled the court's alteration of its original decision.

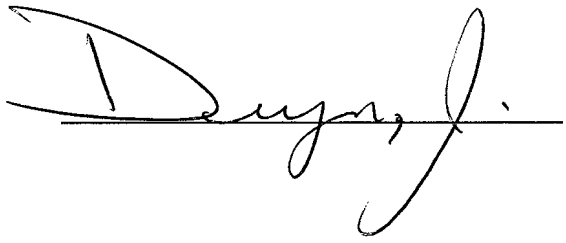
Schultz requests attorney fees on appeal. RAP 18.1 authorizes an award of attorney fees where allowed by law. Under RCW 26.09.140, a party may be entitled to attorney fees on appeal. In exercising discretion under this statute, we consider the parties' relative financial resources.[18] As the trial court determined in 2007 and 2018, Moeller accrued considerable debt from his willful refusal to comply with court orders. But even ignoring such debt, Moeller still has fewer financial resources available than Schultz. Under these circumstances, we decline to award Schultz attorney fees from this appeal.

Therefore, we affirm.



WE CONCUR:





[18] Matter of Marriage of Mohammad, 153 Wn.2d 795, 807, 108 P.3d 779 (2005); Matter of Marriage of Crosetto, 82 Wn. App. 545, 563, 918 P.2d 954 (1996).

Appendix 10

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08/04/2010 02:08:15 PM $0.00
PIERCE COUNTY, WASHINGTON

DIVISION OF CHILD SUPPORT
PO Box 11520
Tacoma WA 98411-5520

Washington State Department of Social & Health Services
DCS Division of Child Support

STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
DIVISION OF CHILD SUPPORT (DCS)

RELEASE - PARTIAL RELEASE OF LIEN

Recording number: 200609190636

Volume number: 000000

Page number: 00000000

Grantor or Creditor: The Department of Social and Health Services.

Grantee or Debtor: MICHAEL OLAN MOELLER , also known as or doing business as: _____ ,

_____ ,

SSN XXX-XX-7832 , DOB 03/29/1979 .

The Division of Child Support (DCS) filed the lien identified above with the PIERCE County Auditor on September 19, 2006 . DCS releases:

☒ The lien identified above in full.

☐ Only the portion of the lien identified above that applies to the following property.

July 28, 2010
Date

S GRANT
Authorized Representative
DIVISION OF CHILD SUPPORT

(800) 345-9976
Telephone Number

In reply, refer to:
Case #: 1305697

0001305697003678959000000000392506

FG VER: (1.4)
2032:07282010/
1305697 / 2032

RELEASE - PARTIAL RELEASE OF LIEN
DSHS 09-296 (REV. 03/1997)

Appendix 11

[redacted]

E-FILED
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PIERCE COUNTY, WASHINGTON

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COUNTY CLERK
NO: 12-2-04409-6

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF PIERCE

DEBBIE JO MOELLER
DOB 8-7-78

Petitioner,

vs

MICHAEL OLAN MOELLER,
DOB 3-29-79

Respondent.

NO. 12 2 04409 6

DECLARATION OF PETITIONER

I, Debbie Jo Moeller, declare under penalty of perjury of the laws of the State of Washington, that the following is true and correct:

[redacted]

I have been involved with Mr. Moeller on and off again for close to 17 years. We have three children together, [redacted] 15yrs), [redacted] (11yrs), and [redacted] (4yrs)

[redacted]

Unfortunately, I

STEPHEN W. FISHER
A Professional Limited Liability Partnership
ATTORNEY AT LAW
COLLEGE PARK PROFESSIONAL CENTER
6314 19TH STREET WEST, SUITE 8
FIRCREST, WASHINGTON 98466
(253) 565-3900; FAX: (253) 565-3988

[redacted]

reconciled with Mr. Moeller in 2007 upon promises that he had changed. It was during that time that our third child, Cali was born. [redacted]. I finally got Mr. Moeller to leave the house in May 2012 [redacted]

[redacted]

STEPHEN W. FISHER
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MICHAEL MOELLER

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Filing Petition for Review

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MICHAEL MOELLER

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Filing Petition for Review

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MICHAEL MOELLER

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MICHAEL MOELLER

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