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**Court of Appeals No. 66855-2-1
Trial Court Cause No. 07-3-01403-2 SEA**

**COURT OF APPEALS
DIVISION I
STATE OF WASHINGTON**

JOEL COHN,

Respondent,

v.

PAULA COHN,

Appellant.

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STATE OF WASHINGTON
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RESPONSE BRIEF OF RESPONDENT

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ORIGINAL

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I. INTRODUCTION

Comes now the Respondent on appeal (Petitioner below and hereafter referred to as ‘the father’), Joel Cohn, by and through his attorney of record, Stuart E. Brown, and respectfully submits his response brief for review. This case does not arise “out of disputes about the welfare of the now 12 year old daughter of the parties,” as claimed by the Appellant (Respondent below and hereafter referred to as ‘the mother’) in her appeal introduction, but in fact arises from the father’s motion to seek a finding of intransigence, and payment for attorney and GAL fees from the trial court after the parties had avoided an additional trial based on the father’s contempt action and Petition for modification of the existing Parenting Plan (PP), that were the direct result of the mother’s continuing, non-stop, blatant, egregious, broad based and destructive behaviors aimed at interfering with the implementation of the final PP order entered by King County Superior Court Judge Michael Trickey on February 11, 2009, an order that itself was delayed after the mother sought a Motion for Reconsideration of Judge Trickey’s initial final parenting plan order of January 5, 2009.

While the mother had every legal right to pursue such an initial motion for Reconsideration, even a cursory review of the entire record since the time of entering of final orders, unquestionably depicts a history

of her obstructionist, delaying, and intransigent behavior that continued over an approximately 18 month period of time, and which included use of abusive use of conflict oriented behavior and alienation of the child against her father.

This series of inappropriate behaviors by the mother required extensive, time consuming and very expensive legal actions by the father and included the necessity of his filing a motion for contempt against the mother for her failure to follow the final court orders and a Petition for Modification to pursue a change in the final PP in order to attempt to end her obstructionism and alienation of the child from her father, by seeking full custody and extensive therapy on the part of the mother as the only available means of stopping the complete destruction of the father-daughter relationship. This process eventually included the court agreeing to appoint a GAL in the person of Mr. Don Layton on December 8, 2009. Notwithstanding the prior year of obstructionist behavior by the mother, from that time onward (appointment of GAL) until the time the parties agreed to avoid trial by accepting the GAL's report recommendations on December 1, 2010 and agreeing to a final PP which provided for a 50/50 division of time with the child, which was entered on December 8, 2010, the mother's obstructionist, delaying, intransigent behavior continued unabated and was described in detail by objective court appointed mental

health professionals (Dr. Elizabeth Milo and GAL Don Layton) as well as indirectly by Department of Health Licensing Investigation professionals as described below). Any claim that the current appeal case is somehow related to or can be defined as simply entailing competing parenting philosophies or legitimate disputes as to how to encourage a child to comply with a court ordered PP is frankly without any merit whatsoever and another sad example of the mother's inability and/or unwillingness to accept both her behaviors and the destructive consequences thereof.

II. STATEMENT OF THE CASE

Paula and Joel Cohn have one female child, who is now 12 years of age. They were divorced after a lengthy trial before Judge Michael Trickey and a final PP was entered on February 11, 2009. The mother, through her attorney, Carolyn Balkema, then filed a motion for reconsideration on January 14, 2009. A final PP (CP 23-33) was then entered on February 11, 2009. While the mother's current appellate attorney, Mr. Landrum, spends three full pages of his appeal brief (single spaced) detailing various sections of that final PP, in an apparent attempt to distract, bias and misdirect this court by including disparaging comments regarding the father's "issues with sexual compulsivity and lack of boundaries," discussion of issues related to the child's "comfort" in

proceeding through the court ordered four month integration plan , and including commentary that “[t]he Petitioner’s residential time with the children shall be limited because there are limiting factors in paragraphs 2.1 and 2.2,” the reality is that such details and discussions are irrelevant to the issue now before the court and again serve simply to distract and misdirect the court from the pertinent issue of the mother’s intransigence and obstructionism and the award of legal and GAL fees by the trial court to the father. Mr. Landrum was not the mother’s attorney at any time during the two years from 2009 to 2010 and unfortunately did not observe her behavior and the court documented admonitions of her behavior that are of relevance in the current action.

Further, in contradiction to the again misleading statement of opposing counsel on page five of his brief, where he states, “The parenting plan, Section 3.10, CP 27, 28, contemplated removal of the restriction with a transition to unrestricted overnight visitation between father and daughter through a five step process,” the order did not ‘contemplate’ but in fact ordered the transition to occur with very specific and timed events that would lead to overnight visits and concordance with the full and final PP. In fact, it was the mother’s very delaying and obstructionist behavior regarding such timely implementation of overnight visits that led some 10 full months later to the father moving for contempt and modification of the

existing PP to stop such behavior and the slow but steady destruction of his relationship with his daughter. As noted below, it also led to King County Commissioner Lori K. Smith's finding/order of December 8, 2009 (CP 68-69) of adequate cause as to the father's Petition for Modification and confronting the mother as to her parental alienation behavior and her clear lack of support in terms of overnight visits and compliance with the final PP. Mr. Landrum then correctly notes that same order "removed the requirement that the child be comfortable with overnights or that she can end visits on her own." CP 69. Any complete plain reading of the two page order makes it quite clear that the Commissioner did so in large part order to address the mother's lack of support and direct psychological interference with completion of such overnights. The order in fact states, "The court finds the mother has not been supportive of father's overnights with the child and that if she believes she is keeping her feelings from the child she is delusional/misguided. The court finds it does not believe Judge Trickey thought reintegration of the full 3/4 (three days for the father and four days for the mother per week) split plan would take 10 months." CP 68. Seldom does one see such direct castigating terms from the court as noted here. The mother did not attempt in any fashion to appeal this finding. Despite this admonition, another year of obstructionism and intransigence on the mother's part would follow.

Opposing counsel on page six of his brief then states, “Even without requiring the child’s acquiescence, ‘reunification’ did not proceed smoothly. Nonetheless the schedule that the parenting plan initially contemplated occurring was implemented by agreed order entered December 8, 2010.” CP 82-92.

Reunification of course did not ‘proceed smoothly’ for the full year from Commissioner Smith’s order until entry of final orders a year later due to the many well documented obstructionist and intransigent behaviors outlined in the father’s Motion and 80 pages of attached exhibits, asking for a finding of intransigence as well as legal fees and GAL fees of February 22, 2011. CP 13-21 and CP 22-102 as to 80 pages of attached exhibits. Further, opposing counsel appears to imply in his statement above that the final settlement and agreed order of December 8, 2010 occurring just weeks before the scheduled trial, was somehow based on the cooperation and amicable agreement of both parties.

In fact, even here the mother continued her obstructionist behaviors in the court halls during several hours of attempted mediation and negotiation by the GAL with the parties and their attorneys, while the parties asked the Bailiff that they be ‘footed’ on the docket, prior to the father’s re-noted motion to compel adoption of the GAL report recommendations of July 24, 2010 (CP 199-216), which included a

number of highly critical comments and recommendations relating to the mother's obstructionist and alienating behaviors and in fact stated on page 11, line 26, "In the event that Paula (mother) fails to demonstrate full cooperation with the amended parenting plan that emanates from the following recommendations, 2.2 restrictive factors should be sought and ordered on the basis of abusive use of conflict (underlined for emphasis)."

It is of note that opposing counsel fails at any time to refer to these recommendations in his file brief, apparently due to the very damning and detailed nature of the report in terms of the very behavior that led to the motion for intransigence and legal and GAL fees.

In addition to choosing to ignore the actual GAL report in his brief, opposing counsel also does not discuss or refer to Submissions 209, 210, 211, and 212 on his designation of clerk's papers. These submissions are sealed confidential reports also filed by the father with his motion for intransigence and legal and GAL fees of February 22, 2011. These sealed confidential reports include the following: 1) A letter from Dr. Elizabeth Milo of November 11, 2009 (CP 162-165) where she describes the mother's intransigent behavior and lack of cooperation; 2) A letter of January 13, 2009 from Linda Schauer, MA, LMHC, a friend and renter at the mother's home, in which she states that she "is submitting the following as requested by Ms. Paula Cohn and her attorney (underlined for

emphasis)” and then proceeds to castigate the father and makes therapeutic recommendations for the PP to the court. The father then appropriately filed a complaint with the Department of Health Licensing (DOH) and Ms. Schauer was sanctioned and placed on probation with a requirement for continuing education for her violation of RCW 18.130.180(4) and (13) as to, “Incompetence, negligence, or malpractice which results in injury to a patient or which creates an unreasonable risk that a patient may be harmed,” and “Misrepresentation or fraud in any aspect of the conduct of the business or profession.” (All of the above included under CP 166-181); 3) The DOH licensing investigation of the frivolous complaint filed against Dr. Milo (the court appointed reintegration therapist for the child) which was of course dismissed due to any lack of merit. CP 182-198. This complaint was clearly filed by the mother to remove Dr. Milo from work with the child in retaliation for Dr. Milo’s commentary about her, and in fact Dr. Milo decided not to return to the case even after the DOH dismissal of the mother’s complaint given the mother’s animosity toward her which then required the appointment of a new therapist (Dr. Leary) and further delay of the reintegration process; 4) The GAL report noted above. The father asks the court to carefully review these documents as well as his motion and attached exhibits of February 22, 2011 as they provide unquestionable evidence of the mother’s intransigence and

obstructionism that the trial court correctly viewed as ironclad proof of the mother's inappropriate behavior leading to its decision to order her to pay the father's legal fees and GAL fees (a decision as to apportionment of GAL fees had previously been reserved by the court and the mother would very likely have had to pay at least 50% of these costs in any event).

Despite the above ample evidence, opposing counsel rather stunningly states on page 9 under the 'Argument Section' of his brief, "In addition, there were not sufficient facts before the court to reach the legal conclusion of recalcitrance." Further, on page 10, he notes, "The father's motion for finding of recalcitrance and requests for all of the father's attorney's fees and all of the GAL fees is nine pages long. (CP 13-21). It is long on accusation and short on specific facts." In reality, there were 100 pages of exhibits replete with 'specific facts,' as well as an additional 50 pages of sealed confidential reports described above which provided the court with additional powerful 'specific facts.' The court below had more than ample evidence on which to make a decision and simply determined in the father's view that oral argument under the circumstances was not warranted which is left to the discretion of the court. The mother of course also did not appeal the decision to hear the motion without oral argument and did not appeal the order itself through a motion for reconsideration but simply choose to pay the costs ordered by the court. Had she done so, the

cost for such a motion would have been immeasurably less costly than the appeal process currently under way.

In returning to the actual procedural history of the case, CP 71-80 details the prior motion of the father heard on November 1, 2010 to implement the GAL recommendations, and includes Commissioner Jeske's order directing the parties to negotiate in good faith and include the GAL in such negotiations before the next scheduled (re-noted) hearing of December 1, 2010.

Following these negotiations in the court halls on December 1, 2010, the court entered its order stating the following, "The parties have reached agreement covering a final parenting plan. The parties shall submit a redrafted final parenting plan to the court by Friday morning December 3, 2010 for the court's signature."

III. ARGUMENT

- A. The court did not err in entering its order of March 4, 2011 finding (a) that the appellant "engaged in destructive, sabotaging, intransigent behavior," which (b) required the respondent "to needlessly spend thousands of dollars of attorney fees and GAL fees" caused (c) by "the mother's direct behavior, and (d) sustained serious damage to his relationship with his daughter."
- B. The court did not err in awarding \$9,461 in attorney fees and \$4,926 in GAL fees to the respondent.

The mother through her attorney argues that "Judge Doerty conducted no hearing and decided no substantive motions in this case

prior to entry of the order finding recalcitrance,” and that further, “He had no personal knowledge of the case. Consequently the judge’s order can only be based on the pleadings presented to him, and not out of his general familiarity with the case as in *Matter of the Marriage of Greenlee*, 65 Wn.App. 703, 710, P.2d 1120 (1992).” Review of *Greenlee* raises the question as to exactly what in this case opposing counsel believes supports his case generally and/or on page 710 of the court’s ruling. In fact, the *Greenlee* court stated unequivocally, “Although there was no specific finding of intransigence, the trial court did state that the award of attorney fees was justified by the fact that the respondent was forced to come to the court to enforce her decree. This language causes us to conclude that the court was relying on the appellant’s intransigence in justifying the award of fees. There is overwhelming evidence (as there is in our present case) supporting such a characterization of the appellant’s behavior.” *Greenlee*, 65 Wn.App. at 708. The *Greenlee* court thus supported the trial courts finding of intransigence and did award attorney fees and did not address any issue as to the trial court’s “general familiarity with the case,” as suggested by opposing counsel. The court below in our case certainly had a great deal of evidence and information on which to base its case and there was no actual trial that took place due to ultimate settlement of the case based on the GAL recommendations as noted above. Aside from the

above analysis, opposing counsel's claim that Judge Doerty had no prior familiarity or serious involvement with this case simply is not true. In fact, Judge Doerty presided over numerous motion and status conference hearings and issued orders on: September 21, 2007 (CP 2); December 20, 2007 (CP 3); on May 23, 2008 (CP 4); on July 7, 2008 (not submitted in opposing counsel's designation of CPs but noted as submission 45 on the court docket and included here as Exhibit 1) where he issued substantive rulings well before trial related to the mother's continuing to sleep in the same bed with the then nine year old child in violation of recommendations from two therapists involved in the case even then (Dr. Milo and Diana Sonne) (Exhibit 2); and on September 19, 2008 (not included in opposing counsel's designation of CPs but noted as submission 54 in the court docket. The court may in fact take notice of the entry on the court docket (attached as Exhibit 1) under submission 29 where it states, "Case to be monitored by Judge Doerty." All of the above makes it quite clear that Judge Doerty was highly involved in the case and are indicative of the reality that he had familiarized himself with the history and facts of this case at a fairly extensive level, as is well known to be his custom to those practicing regularly before him.

On page 8 of his brief, mother's attorney quotes *Mahler v. Szuces*, 135 Wn.2d 398, 435, 957 P.2d 632 (1998) as follows, "Not only do we

reaffirm the rule regarding an adequate record on review to support a fee award, we hold findings of fact and conclusions of law (FNCL) are required to establish such a record.” The *Mahler* court certainly did state a requirement for an adequate record as to fee award decisions in noting, “Washington courts have repeatedly held that the absence of an adequate record upon which to review a fee award will result in a remand of the award to the trial court to develop such a record.” *Mahler*, 135 Wn.2d 398 at 435 citing numerous other cases. However, unlike *Mahler* which involved a complicated insurance subrogation case with a somewhat confusing trial record before the court, as noted at length above, the ruling in our case as to an award of attorney and GAL fees certainly was based on a very comprehensive and clear record before the court. The *Mahler* court noted, “This case exemplifies the rationale for such a rule (as to requirement for an adequate record before the trial court). The record discloses affidavits from four different counsel or firms who represented Mahler. We cannot discern from the record if the trial court thought the services of four different sets of attorneys were reasonable or essential to the successful outcome.” *Mahler*, 135 Wn.2d 398 at 435. There was and is no such confusion as to the record in our case. In terms of the requirement for FNCL noted by the *Mahler* court, opposing counsel’s argument certainly may have some merit. The *Mahler* court noted, “Fee decisions

are entrusted to the discretion of the trial court, but we will exercise our supervisory role to ensure that discretion is exercised on articulable grounds. We remand the fee award to the trial court for entry of proper findings of fact and conclusions of law consistent with this opinion.”

Mahler, 135 Wn.2d 398 at 435. While the father’s motion before the court included very detailed billings from his attorney which specifically indicated billing rates and detailed cost item descriptions as well as what items should appropriately be excluded from any award, and also included a very comprehensive billing from the GAL (CP at 96-100), it is accurate that the two page order signed by the court did not include a FNCL. It is assumed that since the case did not proceed to trial and given the very comprehensive record before the court, the court determined that its basis for its decision to award fees for the items indicated, as well as for the entire GAL fees based on the reality that the GAL would not have been needed at all had the mother not been intransigent for the preceding 10 months, was abundantly clear. Whether the court of appeals believes that based on *Mahler*, the case should be remanded to the trial court specifically to develop FNCL is, of course, left to the wisdom of this court. However, as stated in *Mahler* above, the fact of the finding of intransigence and the fact of a finding for legal fees, has already been made by the trial court and the father respectfully believes these issues

should not be revisited, especially in light of the reality that the *Mahler* court did hold that “Mahler is entitled to an award of reasonable attorney fees” *Mahler*, 135 Wn.2d 398 at 435.

The *Mahler* court further stated, “The court shall assess costs and reasonable attorney fees against a party who appeals the award and fails to improve the party’s position on the trial de novo.” *Mahler*, 135 Wn.2d 398 at 432. The father thus requests of this court that should it uphold the trial court ruling as to the appropriateness of the legal fees and GAL award, that all costs incurred here on appeal by the father, be fully reimbursed to him given the waste of time and money he would have experienced.

As noted above, on page 9 of his brief, opposing counsel claims “there were not sufficient facts before the court to reach the legal conclusion of recalcitrance,” and then cites *Public Util Dist. v. Kottsick*, 86 Wash.2d 388, 545 P.2d 1 (1976) as to four grounds on which a court can order an award of legal fees. It again appears unclear as to what point is being made here in terms of citing the case as the court in *Kottsick* clearly stated, “Washington has recognized a number of equitable exceptions to the no attorney fees rule. A court may grant attorney fees to the prevailing party if the losing party’s conduct constitutes bad faith or wantonness. This exception is not applicable to the present case as the record is void of any bad faith conduct on the part of the respondent.”

Public Util Dist. v. Kottsick, 86 Wash.2d 388 at 390. Our case before this court obviously differs from the *Kottsick* case in that the court below did find intransigence and did award attorney fees based exactly on ‘bad faith and wantonness’ of the mother.

Opposing counsel continued in his brief on page 9 by quoting from *In re Marriage of Pennamen*, 135 Wn.App. 790, 807, 146 P.3d 466 (2006) as follows, “The party requesting fees for intransigence must show the other party acted in a way that made trial more difficult and increased legal costs, like repeatedly filing unnecessary motions or forcing court hearings for matters that should not have been handled without litigation.” He then indicates on page 10 of his brief without any merit whatsoever and in stark contradiction to the facts before the trial court, “The requirements of *Pennamen* have not been met.” Not only have the requirements of *Pennamen* been met in that the entire 18 months of litigation and multiple hearings required after the final PP of February 11, 2009 would never have been necessary absent the mother’s egregious behavior (nor would there have been a need for a GAL ordered by the court), but the *Pennamen* court found in its case, “There is no evidence that Robertson has been intransigent. We deny Pennamen’s request for legal fees.” *Pennamen*, 135 Wn.App. at 807. Our case can clearly thus be

differentiated from *Pennamen* in the very critical regard that the mother was found to be intransigent by the trial court.

Next, in his conclusion section on page 13, the mother's attorney states, "Paula has done nothing that appellate courts in the past have found to be recalcitrance," and cites *In re the Marriage of Foley*, 84 Wn.App. 839, 930 P.2d 929 (1997) to 'support' his statement. Again, it is unclear as to why opposing counsel cites this case when it in fact supports the father's claim for legal fees. The *Foley* court notes, "Mr. Foley finally contends the court erred by ordering him to pay \$3,250 of Mrs. Foley's attorney fees. The trial court has the discretion to award attorney fees in a dissolution action. RCW 26.09.140, *Cleaver*, 10 Wash.App. at 22, 516 P.2d 508. It is an abuse of discretion for a court to award attorney fees to a party that has the ability to pay. *Id.* However, when one spouse's intransigence causes the spouse seeking attorney fees to require additional legal services, then the financial resources of the party seeking the fees is irrelevant. Citing *In re the Marriage of Morrow*, Wash.App. 579, 590, 770 P.2d 197 (1989). The court awarded Mrs. Foley attorney fees based upon Mr. Foley's intransigence. Mr. Foley filed numerous frivolous motions, refused to show up for his own deposition, and refused to read correspondences from Mrs. Foley's attorney. His actions caused numerous delays in the trial and required Mrs. Foley to incur additional attorney

fees. The court did not abuse its discretion in awarding attorney fees.” *Foley*, 84 Wn.App. at 846. Apparently, opposing counsel is suggesting that since the mother’s intransigent behavior over 18 months in our case did not exactly match the specific behavioral examples of intransigence in the *Foley* case which gave rise to an award of legal fees, the father should not be entitled to an award for legal fees. Intransigence is intransigence and although it may appear in many guises and forms, it is intransigence nonetheless and causes the same problems for the party who is the recipient of such behavior. A perfect ‘match’ to the intransigence evidenced by Mr. Foley is not required for a trial court to award legal fees as in fact is noted even in the appellate cases offered by opposing counsel as reviewed above where such legal fees were in fact granted for numerous reasons.

In his conclusion on page 13 of his brief, opposing counsel states, “In order for the court to rationally order an award on the basis of intransigence, it would (i) need to identify specific intransigent acts and (ii) rationally determine the cost to the other party of the intransigence. Obviously the court did not do that.” In fact, as noted above, the court below had an extensive and detailed billing for the father’s time since the start of the mother’s intransigent and obstructionist behavior and had a specific billing from the GAL for his time since his appointment. The

court also had the benefit of hundreds of pages of materials that clearly addressed the multitude of egregious and intransigent behavior on the mother's part in making its decision and simply determined that repeating the father's specific and documented allegations (in his motion) was not required. Again, it is left to the wisdom of this court to determine if it will require the trial court to repeat the obvious and the father will respect this court's decision, whatever it may be. Again, the mother and her attorney made absolutely no effort to seek any such clarification from the court below and made absolutely no attempt to seek a motion for reconsideration for any reason whatsoever as could have easily been done. The sweeping scope of the mother's intransigent and obstructionist behavior over a full 18 month period of time, which continued even after being advised and/or lectured by court appointed mental health and court professionals such as Commissioner Smith, is simply 'breathtaking' and undoubtedly points to the purposeful and malicious nature of her behavior. The attorney award and order that she pay the full GAL fees are reasonable sanctions and more than appropriate under the circumstances in the father's view, especially in light of the reality that the destruction done by the mother to the father/daughter relationship may in fact never be overcome.

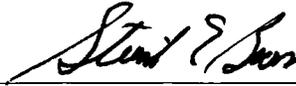
Opposing counsel notes on page 13 of his brief, “The mother has no ability to pay any of the father’s fees.” CP 217-231. This claim as well is untrue. In fact, the mother already has paid the fees in full and certainly has and had the ability to pay based on the reality of the extensive profits of \$76,629 she received recently (June 18, 2010) from the sale of the family home, in addition to an initial \$50,000 that each party received prior to final disbursement of the remainder, making her total take from the sale of house \$126,629. Again, even here she is simply not being truthful.

IV. CONCLUSION

The trial court below correctly ordered the mother to pay the father’s legal costs which were the direct result of the mother’s 18 month campaign to delay, harass, and obstruct the fulfillment of Judge Trickey’s orders. Her intransigent behavior included extensive abusive use of conflict and parental alienation which interfered with and damaged the father’s relationship with his only child, damage that predictably continues to the present time. The mother used roommates and support persons as agents to turn the child against her father, used frivolous and malicious DOH complaints to remove Dr. Milo, the court appointed reintegration therapist, solely because Dr. Milo had been honest and direct about the

mother's destructive behavior. The mother objected to the GAL report stating that his report was not specific enough when in fact the report of Mr. Layton was so damning and specific that it recommended that the mother lose custody immediately if any further abusive use of conflict behavior occurred on her part. Any plain reading of the GAL report, of the letter to the court from Dr. Milo as to her observations of the mother's behavior, and of Commissioner Smith's order, clearly reveal what sadly is so apparent to any reasonable and aware person, but which still apparently escapes the awareness of the mother. Her intransigent behavior and subsequent requirement to pay the father's legal costs and to bear the entire cost of the GAL work as a sanction, are appropriate and the father asks that this court deny the request of the mother and uphold the findings of the court below. To do otherwise will simply reward the mother's behaviors and convince her that she can continue to disrupt the father's relationship with his daughter and disregard court orders. A copy of the father's bill for having to defend the current appeal has been attached as Exhibit 3 and we would ask this court to order the mother to pay these costs in full for having to spend the time and effort to defend against an action that never should have been brought.

Respectfully submitted this 5th day of June, 2011 by:



Stuart E. Brown, WSBA #35928
Attorney for Respondent Joel Cohn

Exhibit 1


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Court: King Co Superior Ct
Case Number: 07-3-01403-2

Sub	Docket Date	Docket Code	Docket Description	Misc Info	Misc Info
	02-14-2007	FILING FEE RECEIVED	Filing Fee Received		King Co Superior Ct 516 3rd Ave, Rm C-203 Seattle, WA 98104-2361
1	02-14-2007	SUMMONS & PET FOR LEGAL SEPARATION	Summons & Pet For Legal Sep /joint		Map & Directions 206-296-9100[Phone] 206-296-0986[Fax]
2	02-14-2007	SET CASE SCHEDULE JDG0025	Set Case Schedule Judge James A. Doerty, Dept 25	02-14-2011ST	Visit Website
3	02-14-2007	CASE INFORMATION COVER SHEET LOCS	Case Information Cover Sheet Original Location - Seattle		
4	02-14-2007	CONFIDENTIAL INFORMATION FORM	Confidential Information Form		
5	02-14-2007	PROPOSED PARENTING PLAN	Proposed Parenting Plan		
6	02-26-2007	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket Legal Separation	03-12-2007PD	
6A	03-02-2007	ORDER	Order For Concurrent Jurisdiction		
7	03-12-2007	LIST	List /facilitator		
8	03-12-2007	MOTION HEARING EXP0001	Motion Hearing Ex-parte, Dept		
-	03-12-2007	AUDIO LOG	Audio Log Dr 325-3 / 2:40		
9	03-12-2007	PARENTING PLAN - TEMPORARY EXP0001	Parenting Plan - Temporary Ex-parte, Dept		
			/sealed Per Sub 102a		
10	03-16-2007	ORDER	Order For Concurrent Jurisdiction (cross-file Of 06-7-02587-1sea)		
10A	03-19-2007	ORDER APPTNG GUARD AD LITEM - CASA EXP0001	Order Apptng Guard Ad Litem - Casa Ex-parte, Dept		
11	03-22-2007	DECLARATION	Declaration Of Thomas Masco /sealed Per Sub 102a		
12	04-06-2007	CONFIRMATION OF PARENTING CLASS	Confirmation Of Parenting Class/rsp		
13	04-09-2007	CONFIRMATION OF PARENTING CLASS	Confirmation Of Parenting Class		
14	04-11-2007	NOTICE OF APPEARANCE	Notice Of Appearance /casa		
15	04-11-2007	ASSIGNMENT	Assignment Of Volunteer/casa		
16	06-08-2007	MOTION AND AFFIDAVIT/DECLARATION	Motion And Affidavit/decl For Order /sealed Per Sub 102a		
17	06-08-2007	MOTION AND AFFIDAVIT/DECLARATION	Motion And Affidavit/decl Re Schedl /sealed Per Sub 102a		
18	06-08-2007	NOTICE OF HEARING ACTION	Notice Of Hearing Mtn Re Case Schedule	06-19-2007	
19	06-08-2007	NOTICE OF HEARING ACTION	Notice Of Hearing Mtn Re Case File	06-19-2007	

20	06-27-2007	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts Cvr Sheet	
21	06-27-2007	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts Cvr Sheet	
-	06-29-2007	STATUS CONFERENCE SETTING	Status Conference Setting	07-06-2007CF
22	07-06-2007	HEARING STRICKEN:IN COURT NONAPPEAR	Hearing Stricken:in Court Nonappear	
23	07-09-2007	LIST	Status/noncompliance Checklist	
24	07-17-2007	ORD TO APPEAR FAIL TO FOLL SCHEDULE	Ord To Appear Fail To Foll Schedule	09-21-2007NC
25	07-27-2007	CONFIRM. ISSUES: OTHER ACTION	Confirm. Issues: Other Parties Waiting For Decision	
26	09-14-2007	REPORT	Report Family Law Casa/updated /sealed Per Sub 102a	
27	09-14-2007	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts Cvr Sheet	
28	09-14-2007	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts Cvr Sheet	
29	09-21-2007	ORDER ON STATUS CONFERENCE	Order On Status Conference Case Schedule Events Stayed - Nc Fee Waived Case To Be Monitored By Jdg Doerty	
30	09-21-2007	STATUS CONFERENCE / HEARING	Status Conference / Hearing	
31	09-21-2007	ORDER SEALING FILE	Order Sealing File	
32	11-27-2007	ORDER TO APPEAR PRETRIAL HRG/CONF	Order To Appear Pretrial Hrg/conf	12-14-2007
33	12-20-2007	ORD FOR CONTINUANCE OF TRIAL DATE	Ord For Continuance Of Trial Date And Order For A Status Conf/rm E854	06-23-2008ST
34	12-20-2007	MOTION HEARING JDG0025	Motion Hearing Judge James A. Doerty, Dept 25	
-	12-20-2007	AUDIO LOG	Audio Log Dr W764/08:53:40	
35	05-23-2008	MOTION HEARING JDG0025	Motion Hearing Judge James A. Doerty, Dept 25	
-	05-23-2008	AUDIO LOG	Audio Log Dr Ftr E854/09:04:50	
36	05-28-2008	ORDER ON STATUS CONFERENCE	Order On Status Conference /to Be Monitored By Assigned Jdg	
37	05-28-2008	ORDER AMENDING CASE SCHEDULE	Order Amending Case Schedule	10-20-2008ST
38	07-08-2008	MOTION	Motion For Temp Order /sealed Per Sub 102a	
39	07-08-2008	MOTION	Motion Re Sleeping Arrangements /sealed Per Sub 102a	
40	07-08-2008	MOTION	Motion To Convert Decree	
41	07-08-2008	MOTION	Motion Re Reintegratoin Plan /sealed Per Sub 102a	
42	07-08-2008	ACCEPTANCE OF SERVICE	Acceptance Of Service	
43	07-08-2008	NOTICE OF HEARING ACTION	Notice Of Hearing Reintegration Plan/convert To Disso	07-25-2008
44	07-08-2008	CHILD SUPPORT WORKSHEET	Child Support Worksheet	
45	07-08-2008	ORDER	Order Re Sleeping Arrangements /sealed Per Sub 102a	
46	08-19-2008	ORDER	Order Re Reintegration Plan	

47	08-19-2008	ORDER FOR SUPPORT	Order For Support	
48	08-19-2008	ORDER	Order Convert To Pet Fr Dissolution	
49	08-22-2008	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts Cvr Sheet	
50	08-22-2008	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts Cvr Sheet	
51	08-22-2008	REPORT	Report /casa	
52	08-25-2008	CONFIDENTIAL INFORMATION FORM	Confidential Information Form	
53	09-19-2008	ORDER ON PRE-TRIAL CONFERENCE	Order On Pre-trial Conference	
54	09-19-2008	STATUS CONFERENCE / HEARING JDG0025	Status Conference / Hearing Judge James A. Doerty, Dept 25	
	09-19-2008	AUDIO LOG	Audio Log /dr W854	
55	10-21-2008	APPEARANCE PRO SE	Appearance Pro Se /joel	
56	10-21-2008	APPEARANCE PRO SE	Appearance Pro Se /paula	
56A	10-21-2008	NON-JURY TRIAL JDG0019	Non-jury Trial Cr: Delores Rawlins Judge Harry J Mccarthy, Dept 19 /sealed Per Sub 102a	
57	10-22-2008	ORDER SETTING	Order Set Hrg/dissoltn /10:00am/w711	11-14-2008
58	11-05-2008	ORDER FOR CHANGE OF JUDGE JDG0034	Order For Change Of Judge Judge Michael J Trickey, Dept 34	
59	11-12-2008	REPORT	Report /fam Law Casa	
60	11-12-2008	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts Cvr Sheet	
61	11-12-2008	REPORT	Report /fam Law Casa - Sealrpt	
62	11-14-2008	ORDER	Order To Return Court Re Ufc Matter	12-09-2008
63	11-21-2008	NOTICE OF APPEARANCE	Notice Of Appearance /rspt	
64	11-24-2008	CORRESPONDENCE	Correspondence From A Party /sealed Per Sub 102a	
65	11-24-2008	CORRESPONDENCE	Correspondence Re Polygraph Exam /sealed Per Sub 102a	
66	11-24-2008	CORRESPONDENCE	Correspondence Re Polygraph Exam /sealed Per Sub 102a	
67	11-24-2008	CORRESPONDENCE	Correspondence Re Polygraph Exam /sealed Per Sub 102a	
68	11-24-2008	CORRESPONDENCE	Correspondence Re Cps Refferal /sealed Per Sub 102a	
69	12-01-2008	NOTICE OF HEARING	Notice Of Hearing /extend Deadline	11-24-2008
70	12-01-2008	ORDER SHORTENING TIME	Order Shortening Time	11-24-2008
71	12-01-2008	ORDER EXTENDING	Order Extend Deadline Fr Submission	
72	12-01-2008	MOTION	Motion For Order Re Shorten Time	
73	12-01-2008	MOTION AND AFFIDAVIT/DECLARATION	Motion And Declaration For Ord Extending Deadline For Material Sub	
74	12-05-2008	DECLARATION	Declaration Joel Cohn/decision /sealed Per Sub 102a	
75	12-05-2008	DECLARATION	Declaration Joel Cohn /addtl Info /sealed Per Sub 102a	
76	12-09-2008	ORDER	9am/order To Enter Final Order	01-05-2009

77	01-05-2009	DECLARATION	Declaration Of Joel Cohn /sealed Per Sub 102a	
78	01-05-2009	LETTER	Letter To Court /pet /sealed Per Sub 102a	
79	01-05-2009	ATTACHMENT	Attachment/fax To Court /pet /sealed Per Sub 102a	
80	01-05-2009	ATTACHMENT	Attachment/supplements /resp /sealed Per Sub 102a	
81	01-05-2009	FINDINGS OF FACT&CONCLUSIONS OF LAW	Findings Of Fact&conclusions Of Law	
82	01-05-2009	DECREE OF DISSOLUTION JDG0034	Decree Of Dissolution Judge Michael J Trickey, Dept 34	
83	01-05-2009	PARENTING PLAN (FINAL ORDER)	Parenting Plan (final Order) /sealed Per Sub 102a	
84	01-06-2009	ORDER	Order Re Maintenance	
85	01-06-2009	PROPOSED PARENTING PLAN	Proposed Parenting Plan /sealed Per Sub 102a	
86	01-06-2009	PROPOSED PARENTING PLAN	Proposed Parenting Plan /sealed Per Sub 102a	
86A	01-06-2009	EXHIBIT LIST	Exhibit List /sealed Per Sub 102a	
86B	01-06-2009	STIP&OR RET EXHBTS UNOPND DEPOSTNS	Stip&or Ret Exhbts Unopnd Depostns	
87	01-07-2009	SEALED FINANCIAL DOCUMENT(S)	Sealed Financial Document(s) /cs	
88	01-07-2009	SEALED FINANCIAL DOCUMENT(S)	Sealed Financial Document(s)	
89	01-07-2009	FINANCIAL DECLARATION	Financial Declaration /j Cohn	
90	01-07-2009	FINANCIAL DECLARATION OF RESP	Financial Declaration Of Resp	
91	01-09-2009	WITNESS RECORD	Witness Record	
92	01-14-2009	NOTICE OF HEARING	Notice Of Hearing/reconsider	01-30-2009
93	01-14-2009	DECLARATION	Declaration Of Paula Cohn /sealed Per Sub 102a	
94	01-14-2009	MOTION FOR RECONSIDERATION	Motion For Reconsideration /resp	
95	01-14-2009	LETTER	Letter From L Schauer, Ma Lmhc /sealed Per Sub 102a	
96	01-22-2009	DECLARATION	Declaration Of Joel Cohn /sealed Per Sub 102a	
97	01-29-2009	OBJECTION / OPPOSITION	Objection To Strike/pet /sealed Per Sub 102a	
98	01-29-2009	DECLARATION	Declaration Of Paula Cohn /sealed Per Sub 102a	
99	02-11-2009	PARENTING PLAN (FINAL ORDER)	Parenting Plan (final Order) /sealed Per Sub 102a	
100	02-11-2009	ORDER ON MTN FOR RECONSIDERATION	Order On Mtn For Reconsideration -denied In Part -granted In Part	
101	02-11-2009	ORDER DENYING MOTION/PETITION	Order Deny Mtn To Strike Reply	
-	02-25-2009	CERTIFICATE MAILED TO OLYMPIA	Certificate Mailed To Olympia	
102	03-05-2009	NOTICE OF ABSENCE/UNAVAILABILITY	Notice Of Absence/unavailability	
102A	03-24-2009	ORDER TO UNSEAL FILE	Order To Unseal File And Seal Certain Subs	
103	04-27-2009	EXHIBIT LIST	Exhibit List /redacted	
104	04-27-2009	ATTACHMENT	Attachment /redacted Clerk Minutes	
105	05-13-2009	EXHIBITS DESTROYED	Exhibits Destroyed	
106	11-05-2009	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket Parenting Plan Vacation Time	11-20-2009FM

107	11-05-2009	MOTION	Motion For Vacation Time/resp	
108	11-12-2009	PETITION/MOTION TO MODIFY	Petition For Modification/adjust /cust Decr/par Plan/res Schedule	
108A	11-12-2009	SET CASE SCHEDULE JDG0039	Set Case Schedule Judge Patricia Hall Clark Dept39	10-18-2008ST
109	11-12-2009	SEALED FINANCIAL DOCUMENT(S)	Sealed Financial Document(s)	
110	11-12-2009	CHILD SUPPORT WORKSHEET	Child Support Worksheet	
111	11-12-2009	NOTICE OF ABSENCE/UNAVAILABILITY	Notice Of Absence/unavailability	
112	11-12-2009	SUMMONS	Summons Modification/adjustment	
113	11-12-2009	CONFIDENTIAL INFORMATION FORM	Confidential Information Form	
114	11-12-2009	NOTICE OF HEARING ACTION	Notice Of Hearing Adq Cause Determ	12-08-2009FJ
115	11-12-2009	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket Adq Cause Determ/temp Orders	12-08-2009FJ
116	11-12-2009	MOTION AND AFFIDAVIT/DECLARATION	Mtn/declr For Temp Order /j J Cohn	
117	11-12-2009	LETTER	Letter Re Supervised Visit /c Rose	
118	11-12-2009	FINANCIAL DECLARATION	Financial Declaration	
119	11-12-2009	SEALED MEDICAL AND HEALTH INFO	Sealed Medical And Health Info	
120	11-12-2009	ORDER TO SHOW CAUSE EXP0007	Order To Show Cause Re Contempt Ex-parte, Dept. Seattle - Clerk	12-08-2009FJ
121	11-12-2009	MOTION FOR ORDER TO SHOW CAUSE	Motion For Order To Show Cause	
122	11-12-2009	DECLARATION	Declaration Of Joel Cohn	
123	11-16-2009	NOTICE	Notice Re Case Schedule	
124	11-18-2009	DECLARATION	Declaration In Rpy/pauld Cohn	
125	11-19-2009	AFFIDAVIT/DCLR/CERT OF SERVICE	Affidavit/dclr/cert Of Service	
126	11-20-2009	MOTION HEARING FAM0001	Motion Hearing Family Law, Dept 1	
-	11-20-2009	AUDIO LOG	Audio Log Dr 276	
127	11-20-2009	ORDER OF CONTINUANCE FAM0001	Order Of Continuance Family Law, Dept 1	12-08-2009
128	12-01-2009	EXHIBIT LIST	Exhibit - Email	
129	12-01-2009	DECLARATION	Declaration Of Theresa Alley	
130	12-01-2009	NOTICE OF APPEARANCE	Notice Of Appearance /limited /carolyn J Balkema	
131	12-01-2009	RESPONSE	Response To Petition	
132	12-01-2009	MEMORANDUM	Memorandum Opposing Modification	
133	12-01-2009	REPORT	Incident Report /spd Police	
134	12-02-2009	RESPONSE	Response To Petition For Adq Cause	
135	12-02-2009	DECLARATION	Declaration /melissa Hoogendoorn	
136	12-02-2009	DECLARATION	Declaration /jennifer Fontaine	
137	12-02-2009	FINANCIAL DECLARATION OF RESP	Financial Declaration Of Resp	
138	12-03-2009	OBJECTION / OPPOSITION	Objection / Opposition /resp	
139	12-04-2009	DECLARATION	Declaration Of Joel Cohn	
140	12-07-2009	NOTICE	Ntc/withdrawal Of Objection/rsp	

141	12-08-2009	MOTION HEARING FAM0001	Motion Hearing Family Law, Dept 1	
-	12-08-2009	AUDIO LOG	Audio Log Dr275	
142	12-08-2009	ORDER RE ADEQUATE CAUSE - GRANTED	Order Re Adequate Cause - Granted /as To Specific Minor Modification	
143	12-08-2009	ORDER APPOINTING GUARDIAN AD LITEM FAM0001	Order Appointing Guardian Ad Litem Family Law, Dept 1	
144	12-21-2009	TRANSCRIPT	Transcript Of 12/8/09 Hearing Order	
-	03-25-2010	STATUS CONFERENCE SETTING	Status Conference Setting	04-02-2010CF
145	04-02-2010	HEARING STRICKEN:IN COURT NONAPPEAR JDG0025	Hearing Stricken:in Court Nonappear Judge James A. Doerty, Dept 25	
146	04-02-2010	LIST	Checklist/status Conf/noncompliance	
147	04-09-2010	ORD TO APPEAR FAIL TO FOLL SCHEDULE	Ord To Appear Fail To Foll Schedule	06-18-2010NC
148	04-22-2010	NOTICE OF APPEARANCE	Notice Of Appearance/acceptance/gal	
149	04-27-2010	NOTICE	Notice Re Faulty Document	
150	05-17-2010	CONFIRM ISSUES: NO STATUS CONFER.	Confirm Issues: No Status Confer.	
-	05-17-2010	CONFIRMATION OF ISSUES	C.i.: Referred To Family Law Med.	
151	06-04-2010	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket Division Of Costs	06-21-2010FM
152	06-04-2010	MOTION	Mtn For Division Of Costs Of Sale /rsp	
153	06-04-2010	DECLARATION	Declaration /paula Cohn	
154	06-04-2010	LETTER	Letter From Mary B Mconachie	
155	06-04-2010	ATTACHMENT	Attachment/summary Of Materials, Costs & Labor	
156	06-10-2010	NOTE FOR MOTION DOCKET ACTION	Re Note For Motion Docket Divide Costs Of Sale	06-30-2010FM
157	06-24-2010	DECLARATION	Declaration Joel Cohn	
158	06-28-2010	DECLARATION	Declaration In Rply/paula Cohn	
159	06-30-2010	LETTER	Letter Corrected Of Mary Mconachie	
160	06-30-2010	MOTION HEARING FAM0001	Motion Hearing Family Law, Dept 1	
-	06-30-2010	AUDIO LOG	Audio Log Dr276	
161	06-30-2010	ORDER FAM0001	Order On Mtn Fr Div Cost Home Sale Family Law, Dept 1	
162	07-19-2010	DISCLOSURE	Disclosure Of Possible Primary Wits /pet	
163	07-28-2010	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts Cvr Sheet	
164	08-31-2010	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket Mtn Adopt Gal Recommendations	09-15-2010FM
165	08-31-2010	MOTION	Motion To Adopt Recommendations Of Gal/petitioner	
166	09-02-2010	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket Disbursement Of Refund To Rsp	09-16-2010FM
167	09-02-2010	MOTION AND AFFIDAVIT/DECLARATION	Mtn/dclr For Ord To Disburse Reserv	
168	09-03-2010	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket /renote Mtn Disbursement Of Refund To Rsp	09-21-2010FM

169	09-07-2010	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket Mtn Adopt Recommendation Of Gal	09-21-2010FM
170	09-14-2010	DECLARATION	Declaration Of Paula Cohn	
171	09-15-2010	DECLARATION	Declaration /joel Cohn	
172	09-17-2010	DECLARATION	Declaration Of Paula Cohn	
173	09-17-2010	DECLARATION	Declaration Of Carolyn Balkema	
174	09-17-2010	FINANCIAL DECLARATION OF RESP	Financial Declaration Of Resp	
175	09-17-2010	DECLARATION	Declaration Of Paula Cohn	
176	09-17-2010	REPLY	Reply To Response To Mtn For Order To Adopt Gal Recommendations/pet	
177	09-17-2010	DECLARATION	Declaration Of Stuart Brown	
178	09-17-2010	OBJECTION / OPPOSITION	Objection / Opposition /respondent	
179	09-21-2010	ORDER GRANTING MOTION/PETITION	Order Granting Mtn Release Funds	
-	09-21-2010	ORDER DENYING MOTION/PETITION FAM0001	Or Deny Mt Adopt Gal Recommendation Family Law, Dept 1	
179A	09-21-2010	MOTION HEARING FAM0001	Motion Hearing Family Law, Dept 1	
-	09-21-2010	AUDIO LOG	Audio Log Dr W 276	
180	09-22-2010	NOTICE OF HEARING	Notice Of Hrg/compel Adr	10-01-2010
181	09-22-2010	MOTION TO COMPEL	Motion To Compel Adr /rsp	
182	10-01-2010	NOTICE OF PRESENTATION	Notice Of Presentation To Ex Parte	
183	10-15-2010	NOTE FOR MOTION DOCKET ACTION	Note For Motion Docket Adopt Gal Recommendation	10-29-2010FM
184	10-15-2010	MOTION AND AFFIDAVIT/DECLARATION	Motion And Affidavit/declaration	
185	10-15-2010	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Rpts/gal Report	
186	10-19-2010	ORD FOR CONTINUANCE OF TRIAL DATE	Ord For Cont Of Trial Date /agreed	01-24-2011ST
187	10-19-2010	ORDER AMENDING CASE SCHEDULE	Order Amending Case Schedule	
188	10-22-2010	DECLARATION	Declaration Of Paula Cohn	
189	10-22-2010	FINANCIAL DECLARATION OF RESP	Financial Declaration Of Resp	
190	10-22-2010	OBJECTION / OPPOSITION	Objection To Testimony Of Gal	
191	10-22-2010	DECLARATION	Declaration Of Guardian Ad Litem	
192	10-27-2010	DECLARATION	Declaration /pet	
193	10-29-2010	HEARING CONTINUED: UNSPECIFIED FAM0001	Hearing Continued: Unspecified Family Law, Dept 1	11-01-2010
194	10-29-2010	ORDER OF CONTINUANCE FAM0001	Order Of Continuance Family Law, Dept 1	11-01-2010
195	11-01-2010	MOTION HEARING FAM0001	Motion Hearing Family Law, Dept 1	
196	11-01-2010	ORDER RE VISIT FAM0001	Ord Re Visitation/custody For Nov Family Law, Dept 1	12-01-2010FJ
		ACTION	Review Hrg -ct	
197	11-03-2010	MOTION	Motion To Adjust Trial Date	
198	11-03-2010	NOTICE OF HEARING ACTION	Notice Of Hearing /jdg Fox	11-12-2010
199	12-01-2010	ORDER FAM0001	Order Re Mtn To Adjust Gal Recomm Family Law, Dept 1	
200	12-07-2010	ORDER TO APPEAR PRETRIAL HRG/CONF	Order To Appear Pretrial Hrg/conf	12-17-2010
201	12-08-2010	MOTION HEARING EXP0001	Motion Hearing Ex-parte, Dept	

			Courts Organization Case Locations Rules Forms Directory Library	
-	12-08-2010	AUDIO LOG		
202	12-08-2010	PARENTING PLAN (FINAL ORDER) EXP0001	Parenting Plan (Final Order)/amended Ex-parte, Dept	
203	12-13-2010	ORD FOR CONTINUANCE OF TRIAL DATE	Ord For Continuance Of Trial Date	02-14-2011ST
204	12-13-2010	ORDER AMENDING CASE SCHEDULE	Order Amending Case Schedule	
205	12-15-2010	NOTICE OF ATTY CHANGE OF ADDRESS	Notice Of Atty Change Of Address	
206	02-03-2011	ORDER ON ASSIGNMENT/REASSIGNMENT JDG0025	Order On Assignment/reassignment To Judge James A. Doerty, Dept 25	
207	02-22-2011	NOTICE OF HEARING ACTION	Notice Of Hearing Findings, Atty & Gal Fees	03-04-2011
208	02-22-2011	MOTION	Motion For Finding Of Intransigence	
209	02-22-2011	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Letter	
210	02-22-2011	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Declr/complaint	
211	02-22-2011	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Complaint Info	
212	02-22-2011	SEALED CONFIDENTIAL RPTS CVR SHEET	Sealed Confidential Gal Report	
213	03-02-2011	MEMORANDUM	Memorandum /respondent	
214	03-02-2011	DECLARATION	Declaration Of Paula Cohn	
215	03-02-2011	DECLARATION	Declaration Of Paula Cohn	
216	03-02-2011	FINANCIAL DECLARATION OF RESP	Financial Declaration Of Resp	
217	03-02-2011	SEALED FINANCIAL DOCUMENT(S)	Sealed Financial Document(s)	
218	03-03-2011	DECLARATION	Declaration Of Joel Cohn	
219	03-04-2011	ORDER	Order To Pay Atty Costs/gal Fees	
220	03-10-2011	NOTICE OF HEARING	Notice Of Hearing /mtn Presentatn	03-21-2011
221	03-10-2011	MOTION	Motion For Presentation/ Pet	
222	03-21-2011	ORDER ON MODIFICATION	Order On Modification	
223	03-22-2011	NOTICE OF APPEAL TO COURT OF APPEAL	Notice Of Appeal To Court Of Appeal	
-	03-22-2011	APPELLATE FILING FEE	Appellate Filing Fee	280.00
224	03-23-2011	SATISFACTION OF JUDGMENT	Satisfaction Of Judgment	
225	03-30-2011	PERFECTION NOTICE FROM CT OF APPLS	Perfection Notice From Ct Of Appls /#66855-2-i	
226	04-04-2011	NOTICE OF ABSENCE/UNAVAILABILITY	Notice Of Absence/unavailability	
227	04-20-2011	DESIGNATION OF CLERK'S PAPERS	Designation Of Clerk's Papers Verified Coa With Cust. Not On Dsg And Pgs 162-221 Sealed Trans Coa 5/4/2011 66855-2/ Landrum/ Pgs 1-161	
228	04-22-2011	INDEX	Index Cks Pprs Pgs 162-221 Sealed	
-	04-22-2011	CLERK'S PAPERS - FEE RECEIVED	Clerk's Papers - Fee Received 705202-cp/ Landrum/ Pd 4/28/2011	135.50
229	04-22-2011	INDEX	Index Cks Pprs Pgs 1-161	
230	04-29-2011	COMMENT ENTRY	Cks Pprs Pgs 1-161	
231	04-29-2011	COMMENT ENTRY	Cks Pprs Pgs 162-221 Sealed	
232	05-16-2011	NOTICE OF APPEARANCE	Notice Of Appearance For Paula	

Exhibit 2

**Superior Court of Washington
County of**

In re:

Paula L. Cohn

Petitioner(s),

and

Joel J. Cohn

Respondent(s).

No. 07-3-01403-2 SEA

Motion for Order re:
Sleeping arrangements

**(Optional Use)
(MT)**

I. Relief Requested

Paula L. Cohn and Joel J. Cohn [Name of party] moves the court for an order re:
Domestic Case Schedule With Children granting the following relief

[explain what you want the court to order]:

Order the Mother not to sleep or lie in the same bed as the Child.

Order the Mother to sleep in a separate room from the Child.

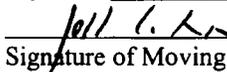
II. Statement of Facts/Statement of Grounds

[Clearly and briefly state the facts upon which you base your case. Print or type.]

Contrary to the recommendation of the Family Preservation Therapist (Diana Sonne) and of the Child's
Psychologist (Dr. Milo), the Mother continues on occasion to allow herself to sleep or lie in the same bed
as the Child (now nine years of age). Further, the Mother always sleeps in the same bedroom as the Child.
Doing these creates an over-dependency in the Child that leaves her afraid to go to sleep-overs at friends' homes,
and potentially unwilling to have overnight visits with the Father outside the family home.

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

Signed at Seattle, [City] WA [State] on 7-July-2008 [Date].


Signature of Moving Party or Lawyer/WSBA No.

Joel Cohn
Print or Type Name

Motion for Order (MT) - Page 1 of 2
WPF DRPSCU 01.0050 (6/2006)

Sent on 7-July-2008 via FAX For Filing in King County Superior Court
Kept at: 5500 35th Ave NE #2 Seattle WA 98105

Superior Court of Washington
County of

In re:
Cohn, Paula Lynne

No. 07-3-01403-2 SEA

and
Cohn, Joel J.

Petitioner(s),

Order re:
Sleeping Arrangements

Respondent(s).

(Optional use)

(OR)

Clerk's action required

Joel J. Cohn [Name of Moving Party (Requester)]
presented a motion for order re: Convert to Dissolution to this court. The court having considered the motion, declaration(s), testimony and the court file, and finding good cause, **It is Ordered:**
The Mother shall establish her own bedroom separate from the Child's, and shall not permit herself to sleep in the Child's room. If the Child resists falling asleep alone or needs comforting during the night, the Mother may, as a last resort, sit awake in a chair in the Child's room until the Child has fallen asleep. She must not fall asleep herself, and must remove herself from the Child's room as soon as she thinks she can do so without waking the Child.

Dated: August 18 2008

Dorothy Swelly
Judge/Commissioner

Presented by:

Approved for entry:
Notice of presentation waived:

Joel J. Cohn
Signature of Party or Lawyer/WSBA No.

Signature of Party or Lawyer/WSBA No.

Joel J. Cohn
Print or Type Name

Print or Type Name

*Sent on 7-July-2008 via FAX for filing in King County Superior Court
pt at: 5500 35th Ave NE. #2 Seattle WA 98105*

Exhibit 3

LAW OFFICES OF STUART E. BROWN
ATTORNEY AT LAW (WSBA #35928)
 3120 COLBY AVENUE, #101
 EVERETT, WASHINGTON 98201
 425-374-7381 (OFFICE); 425-374-7001 (FAX)
fstnat@gmail.com

STATEMENT

July 5, 2011

Bill to

Joel J. Cohn
 9556 Sand Point Way NE, Apt. 7
 Seattle, WA 98115

Billing Rate: \$225 per hour/\$100 paralegal services

DATE	DESCRIPTION	HOURS	AMOUNT	PAYMENT	BALANCE OWING
	Opening Balance for Appeal				0.00
06/06/11	Review Appeal Brief from opposing counsel	1.0	225.00		225.00
07/01/11-07/02/11	Review of Appellate Brief of George Landrum on behalf of Appellant Paula Cohn and research of cited case law	3.0	675.00		900.00
07/03/11	Preparation for and writing of Responsive Brief for respondent	8.0* 6.0	1,350.00		2,250.00
07/04/11	Preparation for and writing of Responsive Brief for respondent	8.0* 6.0	1,350.00		3,600.00
07/05/11	Modification of Brief due to additional information from father	1.0	250.00		3,850.00
07/05/11	Balance Due				3,850.00

COURT OF APPEALS DIVISION I IN
THE STATE OF WASHINGTON

JOEL COHN,)
Respondent)
v.)
PAULA COHN,)
Appellant.)
_____)

Court of Appeals No. 66855-2-1
King County Cause No. 07-3-01403-2 SEA
AFFIDAVIT OF SERVICE

I, STUART E. BROWN, the attorney for the respondent herein, declare under the penalty of perjury under the laws of the State of Washington, that on the 6th day of July, 2011, I personally filed the original Response Brief of the Respondent, with the Clerk of the Court of Appeals, Division I, One Union Square, 600 University Street, Seattle, WA 98101-4170, and delivered a copy of the same to George R. Landrum, Attorney for the Appellant, to 9100 Roosevelt Way NE, Seattle, WA 98115.

Dated this 6th day of July, 2011.



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STATE OF WASHINGTON

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