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COURT OF APPEALS  
DIVISION ONE

JAN 10 2012

No.67319-0-1

No. 64322-3

WASHINGTON STATE COURT OF APPEALS  
DIVISION I

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IN RE MARRIAGE OF:

DANIEL M CASEY  
Appellant

and

SUZANNE E. NEVAN  
Respondent.

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REVIEW FROM THE SUPERIOR COURT  
FOR KING COUNTY

The Honorable Judge Palmer

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REPLY BRIEF OF APPELLANT

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Daniel M Casey (Pro Se)  
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COURT OF APPEALS DIV I  
STATE OF WASHINGTON  
2012 JAN 10 PM 2:03

## TABLE OF AUTHORITIES

### Table of Cases

Trop v Dulles

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### Constitutional provisions

14<sup>th</sup> Amendment

8<sup>th</sup> Amendment Cruel and unusual punishment.

### Statutes

RCW 26.09

RCW 26.09. 187

RCW 26.09 the whole relocation act

Any and all laws that apply to equality, equal protection, etc

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### A. Statement of Reply.

Ms Nevan in her letter to the court complains about me preparing the report, Rap 9.3 allows for an appellant to prepare a Narrative Report “A party seeking review may prepare narrative report of proceeding”. This is an attempt to try and have this court ignore the testimony entered. What is important to remember is that there was a recording of this trial and it has

been submitted to this court as is required when submitting a report. In the recording Ms Nevan can clearly be heard telling the court that she did not apply for jobs she was qualified for.

Ms nevan at any time could have filled an objection to the report or she could have come up with an agreed report of proceeding per RAP 9.4 and she choice not to.

Webster's defines:

Frivolous as "inappropriately silly" Ms Nevan believes it is silly for any father to ask for a 50/50parenting plan, she believes it is silly to think a father could be a primary parent or silly for him to contest the fact that she lied to get a ruling in her favor under "exigent circumstance" rule, so she could relocate our son.

Constant as "continuously occurring or reoccurring"

Barrage as " a Constant outpouring" I have only filed what is required by the court and the fact that she is filing the actions and I am legally required to respond.

Ms Nevan thinks it silly that I ask this court to stick to one of the standard of the eight amendment that it asks and that laws "must draw its meaning from the evolving standards of decency that mark the progress of a mature society". 86 (1958)y" Trop V Dulles 356 U. In fact she asks that father do all the parental jobs expected of today's fathers, which are the same as

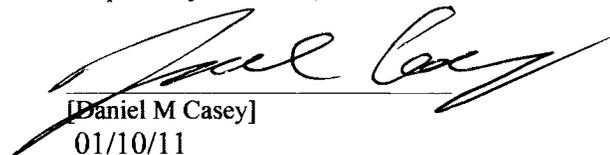
is expected of the mother, when they are married but that when people divorce that they not be allowed the decency to share just because one parent choices not to.

Ms Nevan keeps pleading with the different courts by playing the victim, but it was her who filled for the divorce, it was her who wouldn't follow our agreement, it was her who choose not to get a job, it was her who filled for the relocation, it was her.

When a party suggests that the parents have a 50/50 parental arrangement then the state has no compelling interest to interfere with the privacy of the parties since we are all created equal. Even if the parents have not shared in the parental responsibilities, because of the fact that we are all created equal. Only if there is issues that put the child or one of the parents at risk should the state be able to interfere.

The state is treating divorced parties as have different rights and applying them as it sees fit but differently than it would to married couples .And Ms Nevan thinks its sill that a parent would expect the court to apply standards equally.

Respectfully submitted,

  
[Daniel M Casey]  
01/10/11

JAN 10 2012

Washington State Court of Appeals  
Division I

<b>Suzanne Nevan</b>	)	
<b>Respondent,</b>	)	<b>No. 08-3-07464-5 SEA</b>
	)	<b>Current No. 67319-0-1</b>
	)	<b>Previous No. 64322-3</b>
v.	)	
	)	
<b>Daniel M Casey</b>	)	
<b>Appellant.</b>	)	

CERTIFICATE

I certify that I mailed a copy of the "Reply Brief". This was mailed to Suzanne Nevan home (respondent, Pro Se), at 9 Sunnyside Lane, Bellingham, WA 98229(residence), and mailed to the same address, postage prepaid, on January 10th, 2012.



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