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**COURT OF APPEALS, DIVISION 1 OF THE STATE OF WASHINGTON**

**COA# 70921-6-1**

**King County Superior Court Case #: 12-3-07534-8-KNT/SEA**

**Kyla M. Estes**

**Appellant,**

**V.**

**Jonathan M. LaVoi**

**Respondent,**

**Respondent's Trial Brief**

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COURT OF APPEALS DIV 1  
 STATE OF WASHINGTON  
 2011 JUN 10 PM 12:07  


1  
2 **1. INTRODUCTION**

3 I, Jonathan LaVoi, make this declaration for the appeals court to uphold all aspects of  
4 the final parenting plan signed on October 31<sup>st</sup>, 2013. The final parenting plan grants  
5 full custodial care and decision making to myself and was put in place due to the best  
6 interest of our son Lance LaVoi.  
7

8  
9 Due to Ms. Estes numerous and flagrant attempts to withhold Lance LaVoi from his  
10 father, prior to trial, and obstruct his father-son bond, custody was granted to myself (on  
11 September 26<sup>th</sup>) prior to trial ever taking place. This only occurred after 7 days when  
12 Ms. Estes disappeared with Lance and was eventually tracked down by the police.  
13

14 Although I have not been given all documents related to this appeals case, due to Ms.  
15 Estes not properly delivering them, I feel her appeal has no merit. The most recent  
16 appellant's trial brief (April 21) makes multiple references to domestic violence. There  
17 was never any legitimacy to her numerous motions and where denied in full by  
18 commissioners Bonnie Canada-Thurston and Gallaher and the trial judge Regina  
19 Cahan.  
20

21  
22 Ms. Estes also makes numerous claims that the Guardian at Lien, Visitation  
23 supervisors, and police were all one sided. All of these people were independent  
24 outside entities with no relationship to either party. As such, to suggest that every  
25 independent witness throughout this case was not truthful, lacked credibility, or did not

1 do their jobs in full is frivolous and frankly insulting.

2 Ms. Este's entire appeal shows no real facts of merit that would warrant a change of the  
3 parenting plan. She was not found to be a victim of domestic violence, despite  
4 numerous attempts, she denied the father, on multiple instances, time with his son and  
5 did not and has not done her psychological evaluation as asked by the court for over a  
6 year.  
7

8  
9 **2. ARGUMENT**

10 The final parenting plan is in Lance Lavoï's best interest. Ms. Estes has failed to allow  
11 the father and son to have a steady relationship and has not complied with court orders.  
12 This has resulted in a change of custody prior to trial and full custodial rights being  
13 granted to the father following the conclusion of trial.  
14

15 **3. Conclusion**

16 I ask the appeals court to uphold the final parenting plan in full as it is in Lance LaVoi's  
17 best interest.  
18

19  
20 Respectfully Submitted,

21  9 June 2014

22  
23 Signature – Respondent

24 Jonathan M LaVoi 9 June 2014  
25