

No. 48179-1-II

STATE OF WASHINGTON COURT OF APPEALS, DIVISION II

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*In re:*

JULIE BRANNBERG,

*Respondent,*

v.

JOSEPH BRANNBERG,

*Appellant*

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ON APPEAL FROM THURSTON COUNTY SUPERIOR COURT

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**REPLY BRIEF OF JOE BRANNBERG**

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## I. INTRODUCTION AND GENERAL REPLY

An order for protection issued pursuant to Ch. 26.50 RCW, Washington's Domestic Violence Prevention Act ("DVPO"), requires findings of domestic violence as defined in the statute. Joe Brannberg showed in his opening brief that the unrevised findings do not meet the statutory definition since they do not find the needed bodily injury, physical harm, or the imminent fear of such harm.

In addition to the fact the superior court chose to not revise and left the findings intact, the later comments by the judge who did *not* hear the evidence cannot change or alter the findings, which they would have to do here to cure them. Julie cannot genuinely contend the material differences between a finding that an incident would *not* put a person in fear and a finding that the same incident *would* put a person in fear is a "scrivener's error." The finding determines the ultimate question. If after the fact oral comments could "cure" a so-called "defect" in findings to flip the ultimate factual determination, that would necessarily constitute revision. But since the judge ruled, in writing, that she did *not* revise, that "cure" cannot be made.

The DVPO must be vacated because since the findings do not meet the statute's requirements, there is insufficient evidence to support the order. A remand would be pointless. Vacating the DVPO is important because of its continuing effect on Joe's relationships with his daughters, both in the modification proceeding and beyond, all from a "difficult parenting moment," not true domestic violence.

## II. REPLY ARGUMENT

### A. Summary.

The Response Brief cannot defend the commissioner's findings which the superior court did not revise because those unchallenged findings do not support the legal conclusion there was domestic violence as defined by RCW 26.50.010(1). The Response tries to rely on comments the superior court judge made in the combined revision hearing which also addressed Julie's motion to revise the temporary order entered in the separate parenting plan action. But the written order on Joe's motion for revision of the DVPO says only one thing: "Denied". It is long settled that denial of revision means that the superior court left the commissioner's order in place. The trial court's comments were not in the nature of an oral decision from which later written findings and conclusions were made. In fact, no later findings and conclusions were made.

Whatever the judge said at the hearing can have no effect on the unrevised findings, much less to amend, correct, or change the determinations of the commissioner, since that would amount to revision. In a revision hearing of a proceeding with live testimony where the underlying order was *not* revised, a superior court judge's comments are simply irrelevant because they were not part of the underlying findings and conclusions and order – which were left alone and adopted as written; any change to the commissioner's order necessarily means it was revised.

Since this is the state of the record, the DVPO must be vacated because the only way the superior court could have saved the commissioner's order was to revise it, which it chose to not do. To affirm on this record would require the Court to deviate from the law. It would have to ignore contrary, settled law on revision; ignore the law on the nature, use, and limits of oral decisions; ignore the fact the judge's comments were not a genuine oral decision in advance of written findings and conclusions; and also ignore the text of the Commissioner's findings. The only proper choice is to vacate.

**B. The Failure Of The Unchallenged Written Findings To Support A Conclusion Of Domestic Violence Requires Vacation Of The DVPO.**

It is fundamental that in a bench trial with findings and conclusions, the facts must support the legal conclusions and the judgment, and that where, as here, the facts are not challenged, they are verities. Thus, the Supreme Court held sixty years ago that where “the plaintiff has assigned no error to the findings of fact . . . [t]hey have become, therefore, the established facts of the case, and *the sole question before us is whether these findings support the conclusions of law and judgment.*” *Richert v. Handly*, 50 Wn.2d 356, 357 311 P.2d 417 (1957) (emphasis added).<sup>1</sup> The law has not changed.

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<sup>1</sup> *Accord, In re Estate of Haviland*, 162 Wn.App. 548, 561, 255 P.3d 854 (2011) (review limited to whether the unchallenged findings of fact support the  
(Footnote continued next page)

Last January the Supreme Court, in an estate case, held that where extensive findings were not disputed, “the only question is if the unchallenged facts support the trial court’s conclusions of law.” *Mueller v. Wells*, 185 Wn.2d 1, 6, 9, 367 P.3d 580 (2016). This Court is in synch. *See Miles v. Miles*, 128 Wn.App. 64, 69–70, 114 P.3d 671 (2005) (We consider unchallenged findings of fact verities on appeal . . . The findings of fact must support the conclusions of law.”).

As pointed out in the opening brief, it is an abuse of discretion by employing untenable reasons where the trial court enters an order for which the facts do not meet the applicable legal standard. *In re Marriage of Littlefield*, 133 Wn.2d 39, 47, 940 P.2d 1362 (1997) (“untenable reasons” include where “the facts do not meet the requirements of the correct [legal] standard.”). This requirement is not mere verbiage. If the findings do not meet the legal requirements, the conclusion of law *must* fall.<sup>2</sup>

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conclusions of law); *Fuller v. Emp't Sec. Dep't*, 52 Wn.App. 603, 605, 762 P.2d 367 (1988) (same).

<sup>2</sup> *See, e.g., Richert*, 50 Wn. 2d at 420 (reversing because the findings did not meet the legal requirements); *American Nursery Products, Inc. v. Indian Wells Orchards*, 115 Wn.2d 217, 222, 797 P.2d 477 (1990) (vacating the ruling that certain contract clauses were unconscionable because “we do not agree these findings support the legal conclusion of unconscionability.”); *Keyes v. Bollinger*, 27 Wn.App. 755, 759-60, 621 P.2d 168 (1980) (“findings of fact entered by the trial court failed to support the conclusion that the public interest was not affected” where the trial court found deceptive acts needed for CPA claims, reversing the court’s refusal to apply the CPA for damages or fees).

Remand is not a solution. First, the evidence was adduced by the commissioner at evidentiary hearings with live testimony. The findings are not “inadequate” in the sense they do not exist or are too cryptic, such as being a bare-bones checklist of elements.<sup>3</sup> The findings here were detailed, not challenged, and they stand.

Here, the DVPO must be vacated for insufficient evidence because: 1) the detailed findings state what the evidence is; and 2) those findings have not been challenged but are verities and the facts in the case; 3) that stated evidence constitutes the facts to which the applicable law is to be applied; and 4) that evidence is insufficient to meet the statutory definition of domestic violence. When there is insufficient evidence after the party seeking relief has had full opportunity to present their case, there is no proper basis for a remand and a second bite at the apple. The order must be vacated and the matter dismissed.<sup>4</sup>

**C. The Superior Court’s Decision Not To Revise The DVPO Means The Underlying Order Is Left Alone And Cannot Be Changed Or Fixed By Comments At The Hearing Because That Would Amount To Revision.**

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<sup>3</sup> See, e.g., *State v. Holland*, 98 Wn.2d 507, 516-18, 656 P.2d 1056 (1983) (written findings of “checked boxes” deemed inadequate, but saved by “carefully rendered oral opinion which explained more fully the decision.”).

<sup>4</sup> As noted *infra*, vacation and dismissal for requiring adherence to the legal requirements should not give the Court pause because the trial judge in the follow-on modification proceeding is monitoring the parenting activities of the parties with the help of a GAL and the terms of the DVPO have been partly modified. The ultimate propriety of the DVPO is important for many reasons, including because RCW 26.09.191(2)(n) says the modification court can give weight to the existence of a protection order issued under Ch. 26.50 RCW.

- 1. The law governing revision holds that where the superior court does not revise, the commissioner's order is not changed. Conversely, if a superior court sees a need to change, alter, or correct a commissioner's order, the judge must revise, even if only in part; but the trial court did not revise here.**

As noted at pp. 15-16 of the Opening Brief, per the statute and appellate decisions, the superior court's review of a commissioner's decision is limited to the evidence and issues before the commissioner and when, as here, "the superior court denies a motion for revision, it adopts the commissioner's findings, conclusions, and rulings as its own."<sup>5</sup> In writing for this Court, Judge Reed explained the revision process and that denying revision meant the superior court, after a thorough look, chose to not change the commissioner's ruling, though the judge had the right to do it:

On a motion for revision the judge is required to engage in a de novo review on the record before the court commissioner, including the findings of fact and conclusions of law entered by the court commissioner. RCW 2.24.050; *State ex rel. Biddinger v. Griffiths*, 137 Wash. 448, 242 P. 969 (1926); *In re Smith*, 8 Wn.App. 285, 505 P.2d 1295 (1973). Revision means review. *State ex rel. Biddinger v. Griffiths, supra*. The record discloses that the judge reviewed the probate file, the transcript of proceedings and exhibits before the court commissioner, and the commissioner's findings of fact and conclusions of law. This was the appropriate review. It is clear that by denying the motion for revision the judge meant

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<sup>5</sup> *State ex rel. J.V.G. v. Van Guilder*, 137 Wn.App. 417, 423, 154 P.3d 243 (2007) (citing RCW 2.24.050 and *In re Estate of Larson*, 36 Wn.App. 196, 200, 674 P.2d 669 (1983), *rev'd on other grounds*, 103 Wn.2d 517 (1985)).

that he would not change the commissioner’s findings, conclusions or ruling.

*Estate of Larson*, 36 Wn. App. at 199-200. What the judge did on revision here is just what the superior court judge did in *Larson*. That means that in these circumstances where the decision was to not revise, the appellate review of the superior court’s decision means appellate review of the findings and conclusions that the superior court left undisturbed. *Larson*.<sup>6</sup>

**2. The superior court’s comments are not an “oral decision” and do not and cannot rewrite the DVPO.**

The Response does not seriously contest Joe’s argument that the findings allegedly supporting the DVPO do not meet the required legal standard, because it cannot. The findings say – and fail to say – what they do. The Response needs a fix for the legally inadequate findings. Thus, its main argument is that the superior court’s comments at the revision hearing somehow cured any “minor” deficiencies, defects, or “scrivener’s errors” in the written findings. But the “errors” are not minor, nor mere scrivener’s errors. Those findings decide the ultimate question. The findings matter because they are the adjudicated evidence; unchallenged by either party in the appeal, those unchallenged findings are “verities” – the

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<sup>6</sup> As noted *infra*, the fact the trial judge only revised in part the temporary order in the modification proceeding demonstrates the trial judge knew how to do a partial revision if she deemed it merited.

determined facts – on this appeal. And those found facts mean that the adjudicated evidence does not support the DVPO.

In this circumstance, Julie’s resort to comments made by the superior court in the revision hearing, which she tries to dress up as an “oral opinion,” simply cannot cure the material flaw in the findings, even if those comments were deemed to be a proper “oral decision”, which they are not. There is good reason for this: the oral decision is, genuinely, not final.

The law is settled that “an oral decision of the trial court which is inconsistent with its written findings and conclusions may not be used to impeach such findings.” *In re Marriage of Raskob*, 183 Wn.App. 503, 519–20, 334 P.3d 30 (2014). The most basic reason is because a trial court's oral judgment has no binding effect until it is formally incorporated into findings of fact, conclusions of law, and the judgment. Until the written judgment is entered, the trial court is free to alter, modify, or completely abandon the oral decision. *Ferree v. Doric Co.*, 62 Wn.2d 561, 566–67, 383 P.2d 900 (1963). For example, if the trial court has made an oral decision but that decision has not been reduced to a written judgment, the formalities for vacation or reconsideration of the judgment or for a new trial do not apply, showing that it is not final and the trial judge could yet change the decision.

The most compelling example is the classic case of *DGHI Enterprises v. Pacific Cities, Inc.*, 137 Wn.2d 933, 977 P.2d 1231

(1999). In *DGHI Enterprises*, King County Superior Court judge James McCutcheon conducted a 12-day bench trial, gave a highly detailed oral decision,<sup>7</sup> conducted various post-trial hearings, and was awaiting submission final presentation of written findings and conclusions when he died. *Id.*, 137 Wn.2d at 937. Another superior court judge signed the written findings and conclusions and DGHI Enterprises appealed, claiming the successor judge did not have authority to sign the findings since he had not presided over the evidentiary trial. The Supreme Court agreed, overruling Division I, on the basis that the successor judge could not sign and formally enter written findings and conclusions because he had not heard the evidence – only Judge McCutcheon had. A new trial was required, despite the detailed oral decision which had been transcribed and reduced to findings and conclusions because Judge McCutcheon had not adopted on the record the proposed findings and facts later signed by the successor judge and it all, therefore, rested on his oral decision. The Supreme Court then held that “Until final judgment is entered, the trial judge is not bound by a prior expressed intention to rule in a certain manner,” quoting the *Ferree* decision as follows:

a trial judge’s oral decision is no more than a verbal expression of his informal opinion at that time. It is necessarily subject to further study and consideration, and may be altered, modified, or completely abandoned. It has no

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<sup>7</sup> The oral decision when transcribed was apparently 38 pages. *DGHI Enterprises*, 137 Wn.2d at 952 (Talmadge, J., dissenting).

final or binding effect, unless formally incorporated into findings, conclusions, and judgment.

*DGHI Enterprises* 137 Wn.2d at 944, quoting *Ferree v. Doric Co.*

Consistent with these principles which preclude successor judges from entering findings of fact from proceedings where a different judge heard the evidence,<sup>8</sup> so too the judge here could not make comments in a hearing that would modify and change the written findings earlier made by the commissioner. Similar to the prohibition against successor judges making or entering written findings based on an oral decision of the judge who did hear the evidence, there is no basis in Washington law or analogous basis for the revision judge here to make post hoc findings that “inform” or “clarify” or otherwise amend or change written findings made by the commissioner who actually heard the evidence other than to revise them. Applying the judge’s “comments” in that fashion is contrary to the principles underlying the successor judge cases and to the revision statute and cases.

As the Response recognizes, the commissioner entered his own written findings after the evidentiary hearing on the DVPO, but

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<sup>8</sup> Thus, for these reasons and the underlying applicable statutes, these and other Washington court decisions have consistently refused to permit successor judges to sign and enter findings of fact because they had not heard the evidence. In addition to *DGHI Enterprises*, see e.g., *State v. Ward*, 182 Wn.2d 574, 583-584, 330 P.3d 203 (2014) and *In re Marriage of Crosetto*, 101 Wn. App. 89, 95-101, 1 P.3d 1180 (2000), and cases cited therein. *Accord*, *Miles v. Miles*, 128 Wn. App. at 70-72 (vacating findings entered by successor judge and remanding for entry of findings and conclusions of pro tem (retired superior court) judge who heard the evidence and gave a detailed oral decision).

did not make an oral ruling. Though the superior court discussed the commissioner's order in the revision hearing, those later comments (which are not an "oral decision") cannot modify, change, or undo what is in the written order, especially where they were made after the fact by a judge who did not hear the live testimony from which the findings were derived and who did not make the findings that the oral comments are alleged to "explain." *DGHI Enterprises, supra*.

Without analysis or controlling authority, the Response claims the commissioner's written findings are "inadequate" in order to try to apply the rule in *In re LaBelle*, 107 Wn.2d 196, 219, 728 P.2d 138 (1986), a case which does not apply for many reasons.

In *LaBelle*, four appellants challenged orders involuntarily committing them for treatment of mental disorders on the grounds that they were insufficiently specific to permit meaningful review. The Supreme Court first determined that the written findings on the record were inadequate where it was undisputed that the written findings consisted of preprinted standardized forms reciting generally the statutory grounds for involuntary commitment. *LaBelle*, 107 Wn.2d at 219. Only then did the court look to *supplement* the inadequate written, boilerplate findings with the trial court's oral decision and statements on the record. *Id.*, citing *State v. Holland and Todd v. Superior Court*, 68 Wn.2d 587, 414 P.2d 605 (1966).

But *Holland* does not help Julie, though it was controlling for *LaBelle*. *Holland* held that a trial court’s written findings could be supplemented by its oral opinion where the only written findings were merely checked boxes on a standardized decline of jurisdiction form, boxes which contained boilerplate and conclusory statements that were not directed to the particular facts leading the court to decline jurisdiction. *Holland*, 98 Wn. 2d at 517. **Those** findings were deemed “inadequate,” and appropriately so. They are in stark contrast to the detailed findings here. *Todd* provides even less comfort for Julie’s position. *Todd* held the appellate court could properly look to the trial court’s detailed memorandum decision and oral opinion to determine the factual basis for that judge’s decision, but only because the judge had completely failed to make and enter formal findings of fact, much less enter findings that fit the grounds for dependency. *See Todd*, 68 Wn.2d at 592-94.

Thus, Joe’s case does not involve the type of general, boilerplate findings at issue in *LaBelle* or *Holland*. Nor does it involve completely omitted written findings as in *Todd*. In fact, the Response fails to point to **any** case in which a court holds that detailed written findings like the commissioner’s here were “inadequate” and allowed supplementation. As explained above, the approach in *LaBelle* and its underlying cases of *Holland* and *Todd* is inappropriate in this situation. Those cases do not apply.

The net result is straightforward: The commissioner’s written findings, adopted without change by the superior court, are legally deficient. They do not satisfy the requirements of the statute. As the verified facts, they are insufficient to support the order. Belated oral comments in the record on revision by the judge who did not hear the evidence cannot save them. The DVPO must be vacated and the proceeding dismissed.

Another fatal problem with the Response argument is that, even if Julie’s oral decision theory was applicable, which it is not, she proposes to *supplant*—not *supplement*—the commissioner’s written findings with her own version of findings. But the Response does not cite any case in *any* context, much less a situation like this where the statements of a superior court judge who is *not* revising are allowed to change or modify, much less undo, a lower court’s written findings. The Response tries to re-write the commissioner’s findings as suits Julie, with an interpretation that requires reading every paragraph that cuts against her argument as a “scrivener’s error,” and then resolving the purported error in her favor by *supplanting* the findings of the commissioner with statements made by the superior court – and render a meaning *opposite* to what the text says.

For example, where Finding 9 determines that the March 2015 event “is *not* an event that would have lead a reasonable individual to believe they were at risk of imminent bodily harm,”

Julie concludes that the commissioner “must have been typing fast and capable of scrivener’s errors.” Relying on *LaBelle*, Julie disregards the word “not” in FOF 9 as an “error” and argues that the superior court’s “oral ruling” at the revision hearing “supplements” the written findings of the commissioner. This sounds like revision.

But as noted, the superior court did not revise the commissioner’s findings. It had ample authority to revise the the order, but chose not to. Instead, the court denied Joe’s motion specifically *without* revising. Both the superior court and Julie had ample opportunity to fix any “scrivener’s error” and chose not to. That decision to not revise the commissioner’s findings and decision cannot now be materially changed by claiming comments at the revision hearing did just that because to deny revision means leaving the commissioner’s ruling – all of it – entirely alone. The Response’s proposed fix cannot be done consistent with any Washington court decision or their underlying principles. It would not be mere sleight of hand; it would undermine the concept of the rule of law.

**3. The fact that Julie’s motion to revise was granted in part shows the trial court was well aware of how to partially revise; and that it chose to accept the DVPO findings as written when it did not revise the DVPO at all.**

Julie asked the superior court to revise the temporary modification proceeding which adjusted the parenting plan, and that matter was heard in the same hearing as the revision motion for the

DVPO. The cases have different cause numbers and were, in fact, different proceedings.<sup>9</sup>

The superior court denied Joe's motion to revise the DVPO and then granted in part Julie's motion to revise the temporary parenting plan. CP 233-34. Curiously, the Response does not mention the full nature of the revision hearing and the different motions before the superior court. Since it does not give this Court the full context that that there is more to that story, Joe has supplemented the appellate record so the Court can see the full picture from the pleadings and the transcript to the end that a proper decision is made on the basis of the accurate record.

**D. This Appeal Is Not Moot. Until Vacated It Prejudices Joe In All Future Parenting Proceedings Which Is Fundamentally Unfair Since The Evidence Is Insufficient To Meet The Statutory Requirements.**

As described in the opening brief, restrictions under RCW 26.09.191 have many serious and long-lasting ramifications to the parent-child relationship, beginning with limited visitation and requiring sole decision-making. They also limit the ability to visit the child's school. Such restrictions should only be imposed when the statutory criteria are met with proof that is established under the

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<sup>9</sup> See CP 225-230 and 235 (Joe's motion to revise and the order denying his motion, both under No. 15-2-30198-2, the DVPO proceeding) and CP 265-267 and 269-272 (Julie's motion to revise and the order granting Julie's motion in part, both under No. 09-3-00024-8, the underlying dissolution and continuing parenting cause proceeding).

more stringent provisions of the Parenting Act in RCW 26.09.191(6), which provides that “[i]n determining whether any of the conduct described in this section has occurred, the court shall apply the civil rules of evidence, proof, and procedure,” which include the right to discovery and cross-examination, all the essential components of due process and fundamental fairness. But as explained at OB 21-25, even though flawed and obtained without the rigorous proof, hearing, and procedural due process requirements that are guaranteed under a parenting plan modification, adjudicated DV acts under a DVPO dramatically alter the parent-child relationship during the pendency of the modification proceedings and drive much of how those proceedings are conducted. Most problematic of all, they can be automatic proof of the “history of acts of domestic violence” required to impose .191 restrictions, despite the fact they were “established” under a proof requirement that is, as a matter of law, inadequate under the Parenting Act.

The modification proceeding is continuing and not likely to go to trial until 2017. Adjustments have been made in the context of that proceeding as to the amount and kind of contact Joe has with his daughters based on a new GAL report, and it is closer to normal than when the DVPO was entered, though he still has no contact with Kendra and, thus, no opportunities for conflict with her. Joe’s contact, decision-making, and relationships with his daughters are still materially restricted due to the DVPO. Vacating the DVPO due

to the insufficient evidence in the findings is therefore important and material given its current, continuing impact on Joe's relationship with his daughters and the looming impact of the DVPO on the modification proceedings and ultimate rulings.

**E. The Request For Attorney's Fees Should Be Denied If Joe Prevails On His Appeal Or If Julie Does Not Completely Defend The DVPO.**

The Response makes a limited request for an award of attorney's fees, asking for an award only if there is "a successful defense of [the] DVPO on appeal," citing RCW 26.50.060(1)(g) and *Scheib v. Crosby*, 160 Wn. App 345, 249 P.3d 184 (2011), also commenting that the appeal is meritless.

First, since the request is limited to successfully defending the DVPO, if Joe prevails on appeal the basis for her request is gone. Second, predicated the fee award on successful defense of the DVPO reinforces that Julie intends on using the DVPO in the modification action and gives another reason why this appeal is not moot. Third, although the Response states the appeal is "meritless," it makes no genuine argument, no citation to or discussion of the criteria for awarding fees for a truly meritless (*i.e.*, frivolous) appeal. Given these limits, a fee award should only be entertained if Julie fully and completely prevails on appeal, and then granted only if the Court, in its discretion, believes it appropriate, since the statute uses the discretionary term that fees "may" be awarded.

### III. CONCLUSION

Joe Brannberg respectfully asks the Court to vacate the protective order because the findings do not meet the legal requirements of the statute necessary to interfere with the parent-child relationships between Joe and his daughters. Requiring compliance with the legal requirements for protective orders will not harm any of Joe's daughters.

Vacating the order will move Joe closer to an even playing field in the pending modification. It will preclude an automatic ruling that he has a "history of domestic violence" for purposes of imposing .191 restrictions. This is fair and just because such restrictions (which have many ramifications starting with requiring sole decision-making) should only be imposed when the statutory criteria are met with proof that is established under the more stringent provisions of the Parenting Act in RCW 26.09.191(6), which requires use of the essential components of due process, not under the lax standards of Ch. 26.50, which here allowed for entry of an order and restrictions following a "difficult parenting moment."

Dated this 2<sup>nd</sup> day of October, 2016.

**CARNEY BADLEY SPELLMAN, P.S.**

By   
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*Attorneys for Appellant Joe Brannberg*

### CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that I am an employee at Carney Badley Spellman, P.S., over the age of 18 years, not a party to nor interested in the above-entitled action, and competent to be a witness herein. On the date stated below, I caused to be served a true and correct copy of Reply Brief of Appellant Joe Brannberg on the below-listed attorneys of record by the methods noted:

- Email and first-class United States mail, postage prepaid, to the following:

Robert Martin Morgan Hill Morgan Hill PC 2102 Carriage Dr SW Bldg C Olympia WA 98502-1049 <a href="mailto:rob@morganhill-law.com">rob@morganhill-law.com</a>	Patrick W. Rawnsley PWR Law, PLLC 1411 State Ave NE Ste 102 Olympia WA 98506-4467 <a href="mailto:pat@pwr-law.com">pat@pwr-law.com</a>
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DATED this 3rd day of October, 2016.

  
\_\_\_\_\_  
Catherine A. Norgaard, Legal Assistant

**CARNEY BADLEY SPELLMAN**

**October 03, 2016 - 9:08 AM**

**Transmittal Letter**

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Case Name: Marriage of Brannberg

Court of Appeals Case Number: 48179-1

**Is this a Personal Restraint Petition?** Yes  No

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Motion: \_\_\_\_\_

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Brief: Reply

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: \_\_\_\_\_

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Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

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Petition for Review (PRV)

Other: \_\_\_\_\_

**Comments:**

Appellant's reply brief and cert of serv.

Sender Name: Patti Saiden - Email: [norgaard@carneylaw.com](mailto:norgaard@carneylaw.com)