

Court of Appeals Cause No. 49598-8-11

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COURT OF APPEALS  
DIVISION II

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STATE OF WASHINGTON

BY  \_\_\_\_\_  
DEPUTY

**COURT OF APPEALS OF THE STATE OF WASHINGTON  
DIVISION II**

Chun Cha Rogers

\_\_\_\_\_

Respondent,

v.

Loucinda Jo Rushford

\_\_\_\_\_

Appellant.  
Brief of Loucinda Rushford

Loucinda Rushford  
ProSe

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## A. Introduction:

### Grounds for Appeal

There are two main reasons, or “grounds,” for which an appeal may be filed: (1) a serious error was made at any point during the trial, and (2) the evidence presented clearly does not support the verdict.

The first compelling reason that always justifies an appeal is a mistake with the gathering, use or acceptance of critical evidence.

Allowing inadmissible evidence in a civil case is a legal error and grounds for appeal. Other legal errors made during a civil case may include a lack of convincing evidence.

### Use and Abuse of Restraining Orders

#### Orders Issued with a Heavy Hand

The original idea behind domestic restraining orders may have been sound. But over the years, state definitions of abuse have been widened and evidentiary requirements relaxed.

The Fourth Amendment affirms, “The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated” [emphasis added]. It is those rights to be secure in their houses and to be protected from unreasonable seizures that are violated by unjustified restraining orders.

The U.S. Supreme Court once commented that the Fourteenth Amendment is violated by legal procedures that appear “fair on their faces,” but are administered “with an evil eye or a heavy hand.”<sup>37</sup> The same could be said about restraining orders that are freely granted without evidence or proof.

Failure to state a claim, asserts that even if all the factual allegations in a complaint are true, they are insufficient to establish a cause of action. This defense is raised via Federal Rule of Civil Procedure 12(b)(6) and counterpart state court rules for state actions. Per Rule 12(b), generally, the defenses should be presented in the defendant’s response to the complaint. However, some defenses can be asserted in a separate motion to the court. This allows a defendant to respond to procedural flaws in the filing of the complaint without responding to the merits of the case. Moreover, this helps the court to quickly dismiss claims that are without any legal merits.

### Cases

McElroy W., Abuse of temporary restraining orders endangers real victims. *FoxNews.com*

**State v. Johnston**, 156 Wn.2d 355, 127 P.3d 707 (2006). The court ruled that RCW § 9.61.160, consistent with the First Amendment, must be construed to prohibit only to true threats. A “true threat” is a statement wherein a reasonable person would foresee that the statement would be interpreted as a serious expression of an intention to inflict bodily harm upon or to take the life of another individual. Conviction reversed

**State v. Cayetano-Jaimes** (September 21, 2015). Conviction reversed and case remanded for a new trial because defendant's constitutional right to present a defense was violated by judge's refusal to hear evidence.

State v. Romano

662 P. 2d 406, 34 Wash. App. 567 - Wash: Court of Appeals, 2nd ..., 1983 - Google Scholar ... PETRICH, C.J. Defendant, Joseph L. Romano, appeals from the imposition of the maximum sentence on two counts of first degree theft on the ground that the sentencing judge's **ex parte communications** violated his due process rights by creating an appearance of unfairness.

**B. Assignments of Error:**

**Assignments of Error**

01. The trial court erred in applying presumption that the plaintiff would be allowed to file for a DVOP (Domestic Violence Order of Protection) under RCW 26.50.010(1), 26.50.010(2), 10.14.040
02. The trial court erred in granting a temp. DVOP when it did not apply the rules for a temporary DVOP under RCW 9A.04.110, 26.50.070
03. The trial court erred in applying presumption that there were grounds for converting to an Anti-Harassment order of protection. RCW 9A.46.020, 9A.04.110, 10.14.020, 10.14.030, 10.14.040, 10.14.080, 10.14.190, United States Constitution Amendment 1, Washington State Constitution Act 1\*5, CR41
04. The trial court erred in granting final order without grounds or cause in not applying the rules for an anti-harassment order.  
RCW 9A.46.020, 9A.04.110, 10.14, 10.14.20, 010, 10.14.020, 10.14.030, 10.14.040, 10.14.080, 10.14.190
05. The trial court erred in not dismissing the motion on grounds of it being based on irrefutable acts of perjury, false swearing, and fraud of the Court and not imposing sanctions to opposing counsel for subordinating irrefutable perjury. RCW:9A.72.010, 9A.72.020, 9A.72.030, 9A.72.040, 9A.72.085, 26.50.030, Cannon 2.15, CR5, CR6, CR29, CR41, CR60, ABA Model of Judicial Procedure 3.4, 4.1
06. The trial court erred in allowing entry of excluded evidence. Not applying Exclusionary rule.  
Washington State Constitution Act 1\*2
07. The trial court erred in accepting inadmissible and materially false evidence applying the rules of service in RCW 9A.72.010, CR5, CR6, CR29, CR41, ABA Model of Judicial Procedure 3.4, 4.1
08. The trial court erred in not allowing me to adequately and fairly present a defense in not applying the 5th, 7th, 9th, and 14th Amendments to the United States Constitution or the 1\*3, 1\*8, 1\*13, 1\*29, 1\*32 Acts of the Washington State Constitution. Cannon

2.2, 2.3, 2.6,  
RCW 10.14.190

09. The trial court erred in having ex parte communication with opposing counsel in not applying the Rules of Judicial Conduct. Cannon 1.2, 1.2, 2.2, 2.9, 2.15, RCW 10.14.190
10. The trial court erred in allowing opposing counsel to be a witness in not applying the ABA (American Bar Association) Model for Judicial Procedure Rule 3.7
11. The trial court erred in not assigning counsel or making accommodations for the disabled in not applying CR33 or Title II of the ADA (Americans with Disabilities Act)
12. The trial court erred in assigning excessive stipulations and penalties on the final order in not applying RCW or the 8th Amendment to the United States Constitution, Act 1\*14 of Washington State Constitution. RCW 7.21.030, 7.21.040, 10.14.080, 10.14.190
13. The trial court erred in incorrectly filling out the both the first, and final, anti-harassment order. CR60 There was also an error on the temporary anti-harassment order. CR4, CR11

there was also an error on the paper work on the temp. order  
and in crude CR4 at the end of 13 with the other references for that section

C.

### **Issues Pertaining to Assignment of Error**

01. Whether or not the trial court commissioner adequately examined the authenticity of fact and claims stated to determine merit.
02. Whether or not the trial court commissioner abused her right of discretion when determining if a temporary order was warranted.
03. Whether or not the trial court commissioner abused her right of discretion and lacked grounds when ordering to convert to a civil anti-harassment on lack of evidence and without merit.
04. Whether or not the trial court commissioner abused her right of discretion and lacked the grounds when issuing the final civil anti-harassment order on lack of evidence and without merit.
05. Whether or not the trial court commissioner abused her right of discretion when not dismissing on grounds of blatant and irrefutable acts of perjury and false swearing by the plaintiff in an attempt to defraud the court.

06. Whether or not the trial court commissioner abused her right of discretion and failed to fulfill her ethical obligations when not sanctioning and properly reporting opposing counsel subordinating such blatant and irrefutable perjury.
07. Whether or not the trial court commissioner abused her right of discretion by not excluding a materially false affidavit filed by opposing counsel along with two pieces of evidence all without their required declaration of service.
08. Whether or not the trial court commissioner abused her right of discretion and violated my civil rights.
09. Whether or not the trial court commissioner abused her right of discretion and violated rules of judicial conduct when having intentional ex parte communication with opposing counsel about the case other than at the hearing for temporary order.
10. Whether or not the trial court commissioner abused her right of discretion and violated the ABA's Model for Judicial Procedure by allowing opposing counsel to be an official witness and simultaneously represent the plaintiff.
11. Whether or not the trial court commissioner when informed, and made aware, that I was legally disabled, abused her right of discretion and violated title II of the ADA in not assigning me counsel or attempting to make accommodation for my needs.
12. Whether or not the trial court commissioner abused her right of discretion and violated my Civil Rights by imposing extreme and excessive stipulations, sanctions, and penalties if violated, that supersede the legal maximums allowed for an anti-harassment order. One of which the law specifically forbids.
13. Whether or not there were materially important and crucial clerical mistakes and or legal technicalities on both the original anti-harassment order and /or on the final order and whether or not if any still exist.

**D.**

**Authorities:**

**Statutes:**

1.) American Bar Association  
Model for Professional responsibility

3.4

3.7

4.1

2.) RCW

7.21.030

7.21.040

9A.46.020

9A.04.110

9A.72.010

9A.72.020

9A.72.030

9A.72.040

9A.72.080

9A.72.085

10.14

10.14.020

10.14.030

10.14.040

10.14.080

10.14,.190

26.50.010(1)

26.50.010(2)

26.50.030

26.50.070(1)

3. Washington Court rules

CR (Superior Court Rules)

4

5

6

11

13

29

41

60

4. Washington Court rules

GR (General)

33

5. Washington Court rules  
CJCRP (Judicial Conduct)

Cannon 1.

1  
2

Cannon2.

2  
3  
6  
9  
15

6. U.S Constitution  
Amendments

1  
4  
5  
7  
8  
9  
14

7. Washington Constitution

Act

1 §2  
1 § 3  
1 § 5  
1 § 8  
1 § 13  
1 §14  
1 § 29  
1 § 32

8. Washington University Law Review

Volume

63

Issue

1 (1985)

E.

**Statement of case:**

On 07/29/16 Mrs. Roger accompanied by counsel applied for a civil DVOPCP 1-7. They did so by lying as to her relationship to me. Mrs. Rogers intentionally committed perjury by stating that he was my mother in order to appear qualified to apply for the order. (CP 1) In order to be able to file for a DVOP a person must meet the Family or Household requirement. And she is merely my Landlord and nothing more. I reside and rent a completely separate household, a mother in-law house behind hers and separated by two fences and two gates and a whole back yard. This blatant attempt to defraud the court was not by accident, she was assisted by counsel in filling it out and did so because she knew she would never be able to qualify for a civil anti-harassment order. This would have had to be apparent to counsel as she assisted her in filling one out for her son as well and right before where she claimed he was her son. And then went on to refer to me and his relationship and us living together as a couple. The court should have realized that what she was claiming was false, and not granted the order. And if following ethical recommendation should have thrown out the case. There were several other options or avenues she could have chosen that would not have required committing a crime. Perjury in civil cases, while hard to prove most of the time, is still a class B felony punishable by 365 days in jail and a fine of \$5000.

Further into the same motion she commits false swearing, which is a crime as well when she says that I entice him to harm loved ones that call the police on him and states that it is shown in his assault II conviction (CP5) which really is DVIII and has nothing to do with me since I didn't even meet Mr. Rogers until almost three years later. She knows it was Misty Butlery who was his girlfriend at the time and victim in the case. The sole and only purpose for saying/implying such a thing is to attempt to fraud the court by tainting my character and the courts view of me to increase her chances of getting them to grant an order in her favor that they know there are no grounds for. She also attempts this by saying that the police have had to respond to the residence over a dozen times. This however, is technically true, they have been out there several times (CR5). But when she says it was on me, that is completely misleading and false. They never had been there, or called on me. They were really there because of her youngest son, James, and her mostly, as well as David on occasion and with me being the victim in some way 9 out of 10 times I would say. She also said that I physically and verbally abuse her and her younger son. (CP5)

At the very next court date when asked if I abused her by the commissioner, Ms. Rogers admits it is not true. (RP3 11-12) And when asked about me encouraging her son, she responds with 'I won't talk about that'. (CP4-5-6, RP4-5)

The trial court, not following the rules and guideline for a temporary order, granted her one. A temporary order is only supposed to be granted when immediate and severe (death, dismemberment, or permanent disfigurement) along with a sworn statement made under oath as to specific acts complete with dates and time, what happened, and any treatment received or police involvement.

On the same application when asked if I harass her, she chose to respond with "does not apply". (CP5)

And on (CP6) when asked if I have any weapons that may present a serious and imminent threat, she checked the box marked "NO".

7/29/2016 A Temp. order is granted. (CP8-10)

Not only is it granted without one single mention of anything specific, but just some very vague repeated "she entices", which definitely doesn't equal immediate or severe bodily harm from me at all but is granted without properly being read and her questioned.

7/30/16 I was served by police with temp. order and forced to leave my home and most of my belonging which I still have not been able to get back.

8/12/17 Court was held to decide the outcome

At court, I was represented by paid counsel, who didn't prepare and was counting on getting a continuance but was denied. I found out in court that day that he was going on vacation immediately after court.

8/12/17 order to convert to anti-harassment order was granted. (CP11, RP5 18)

My lawyer said not to worry we would get it on appeal. He then went on vacation and was unreachable he did this without telling me about the 10-day limit to file one. He supposedly came back the day it was due but when I finally reached him on his cellphone he was no wear near his office and the court house therefore making me miss the chance to file one. He then filed an intent to withdraw without ever serving me with any papers about it.

That day in court the only thing she said I did (after admitting the rest to be untrue or refusing to talk about) was David told her to leave me alone. (RP3 15-20). Not that I told him to say it but just that he said it. That would be his actions not mine and I should not have been held accountable. It occurred on July 24, 2016 and already had been ruled as excluded. (RP2 21) And would be covered under the first Amendment to the Constitution "Free Speech". There is not one thing she said I did or said so definitely the required grounds for an anti-harassment order were never met.

A single incident, no matter how much

it may bother you, does not constitute legal harassment

The statute is not designed to penalize people who are overbearing, obnoxious or rude.

It is geared to protect those victims to whom objectionable behavior is directed.

**On 7-21-2016** The court held an ex parte hearing and granted a temporary DVOP.  
CP 1-6

**On 8-01-2016** Return of service was filed with the court.

**On 8-12-2016** A hearing was held to decide the outcome of the motion for relief. CP 16

**On 8-12-2016** An order for motion to convert was entered

**On 8-12-2016** An order for protection from civil harassment was issued. CP 21

**On 8-12-2016** My Lawyer went on an unannounced vacation.

**On 8/22/2016** he returned but the deadline for review had passed.

**On 8/26/23016** he filed Notice to withdraw without any mailing of motion to me. and without any service of such papers.

**On 9/2/2016** motion to modify was filed. (CP16-18)

**On 9/9/2016** photos were turned in as evidence without a declaration of service.

**On 9/22/2016** response to respondent's motion to modify was turned in with no declaration of service

**On 9/22/2016** false declaration of counsel was turned as evidence without declaration of service along with another piece of evidence without service as well.

**On 9/23/2016** motion to modify hearing was held. (CP20-21)  
and extreme and cruel and un usual stipulations as well as punishment if violated were put on anti-harassment order that in the rule strictly forbids. (CP20-21)

The commissioner was informed of me being disabled and to what my disability pertained to. I'm legally disabled due to PTSD, anxiety, major depressive disorder and agoraphobia from the abuse I received from her and her sons. (RP3 23-25) But made no effort to be accommodated in any way. if anything, she was just the opposite. She refused to even look at or read any of my evidence. (RP 5 18-21)

Anti-harassment protection order, shall not prohibit the respondent from the use or enjoyment of real property to which the respondent has a cognizable claim unless that order is issued under chapter 26.09 RCW or under a separate action commenced with a summons and complaint to determine title or possession The court in granting an ex parte temporary anti-harassment protection order or a civil of real property.

**On 9/23/2016** request for civil stand by denied (RP6 20-23)

**On 9/23/2016** opposing counsel stayed and had unsanctioned and unethical ex parte communication after modification hearing. (RP8 25 RP9 1-4)

F.

## Argument

### 1.) Use and Abuse of Restraining Orders

#### Orders Issued with a Heavy Hand

The original idea behind domestic restraining orders may have been sound. But over the years, state definitions of abuse have been widened and evidentiary requirements relaxed.

The Fourth Amendment affirms, "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated" [emphasis added]. It is those rights to be secure in their houses and to be protected from unreasonable seizures that are violated by unjustified restraining orders. The U.S. Supreme Court once commented that the Fourteenth Amendment is violated by legal procedures that appear "fair on their faces," but are administered "with an evil eye or a heavy hand."<sup>37</sup> The same could be said about restraining orders that are freely granted without evidence or proof.

According to state, County statute grounds were never met to warrant a Temp. DVOP. **RCW 26.50.010 and RCW 26.50.010**. There was no mention as to anything immediate or immense irrebuttable harm. Only a very vague statement of me inciting someone else which at court she refused to talk about. **RP 3 4-5** Ex parte temporary order for protection.

An ex parte temporary order for protection is designed to protect you until the court hearing for a final order for protection. When you file your application for a temporary order for protection, the judge will hold a hearing either in person or by telephone where you will tell the judge why you need the order for protection.

(The abuser will not have notice of this hearing or be present, which is what is meant by the term "ex parte.") The hearing will be either on the day the petition is filed or the following day that court is in session. \* A judge will grant the temporary order only if s/he believes that you are in immediate danger of a severe injury. \***1R.C.W. § 26.50.070(1**

"Substantial bodily harm" means bodily injury which involves a temporary but substantial disfigurement, or which causes a temporary but substantial loss or impairment of the function of any bodily part or organ, or which causes a fracture of any bodily part.

"Great bodily harm" means bodily injury which creates a probability of death, or which causes significant serious permanent disfigurement, or which causes a significant permanent loss or impairment of the function of any bodily part or organ;

Black's Law

*1. Present; at once; without delay; not deferred by any interval of time. In this sense, the word, without any very precise signification, denotes that action is or must be taken either instantly or without any considerable loss of time.*

*Immediately does not, in legal proceedings, necessarily import the exclusion of any interval of time, it is a word of no very definite signification, and is much in subjection to its grammatical connections. Howell v. Gaddis, 31 N. J. Law, 313.2. Not separated in respect to place; not separated by the intervention of*

*any intermediate object, cause, relation, or right. Thus we speak of an action as prosecuted for the "immediate benefit" of A., of a devise as made to the "immediate issue" of B., etc.*

The temp. order was only granted as a direct result of blatant acts of Perjury, false swearing in the attempt to fraud the court. **9A.72.020, 9A.72.040**. And should have been thrown out. **CR 60** The statement was made on or pursuant to instructions on an official form

bearing notice, authorized by law, to the effect that false statements made therein are punishable; "Materially false statement" means any false statement oral or written, regardless of its admissibility under the rules of evidence, which could have affected the course or outcome of the proceeding; whether a false statement is material shall be determined by the court as a matter of law; **9A.72.010** And should have been thrown out. **CR 60** While the rules do not provide a direct remedy when a party commits perjury during a deposition, Federal Rule of Civil Procedure 37(b), and its equivalent in the rules of many states, together with the inherent powers of the courts provide a strong argument for dismissal of an action in its entirety based on such perjury. At the hearing, all accommodations were made to cater to her needs for an interpreter but none were made to accommodate mine pursuant **ADA and GR RULE33**

An order to convert a civil protection order from harassment never should have been given. The grounds to get such an order have pretty high stipulations and must not be one thing nor one time no matter how much they bother you. And have very specific definitions of such requirements **10.14.080, RCW 10.14.010, RCW 10.14.020, RCW 10.14.030, RCW 10.14.040, (RCW Chapter 10.14), RCW 9a.46.020, RCW 9A.46.060, RCW 9A.46.110,**

### **RCW 9A.04.110**

The one and only thing she accused me of was her Son telling her to leave me alone and saying shut up **RP 3 15-20 which demonstrates by what she says as to her harassing me not the other way around. Everything she says he said is something you would only say to a person doing the harassing.**

Besides someone else's action are not mine, they are theirs and have no relevance on any case or thing pertaining to holding me accountable. And since that is the only thing she said I did was her son, not me, saying the things. No evidence was ever given that wasn't recanted as a lie at court to anything I did, harassing or otherwise. So how could any order be granted against me. Besides a harassment order cannot violate someone's constitutionally protected right of free speech. Verbal statements of such nature would not constitute harassment. Regardless, it still was not me doing the speaking anyway.

It occurred on the date already deemed by the commissioner as inadmissible **2 20-21.**

When the order was converted huge clerical errors on the commissioner's behalf occurred on the paper work No address was listed and no box was checked to indicate where to stay away from. **CP 13**

AND STILL ON THE ORDER NOW IN EFFECT THE WRONG EXPIRATION YEAR IS LISTED. SHE GRANTED IT FOR 1 YEAR. RP 5 18-19

Meaning the correct expiration year is 2017 but the order indicates 2018. **CP 14**  
which clerical error is grounds for relief of order. **CR 60**

At the motion to modify hearing I was not allowed to present any evidence as to why the order should be modified or vacated. **RP 3 23-25 and RP 4 1-2** and also, very clearly, I stated being disabled and when the judge violated **GR 33 and title II of the ADA a person with a disability entitled to an attorney in a civil matter as a reasonable accommodation under title II of the ADA or under state law?**

The ADA or, for that matter, a state antidiscrimination law, mandate that an attorney be appointed for that person with a disability much in the same way as an attorney is appointed for someone who cannot afford an attorney in a criminal matter.

At this hearing is where mention of evidence turned in, evaluated, and used to predetermine judgement was allowed and condoned by the commissioner knowing far well no declaration of service was turned in for any of it. Violating CR 5,5,7, and 14th amendments to the constitution, and Washington state constitution Art. 1, § 3,

**No person shall be deprived of life, liberty, or property, without due process of law.**

1, § 8, 1, § 12, 1, § 13, 1, § 29, 1, § 32

The integrity of the civil litigation process depends on truthful disclosure of facts. A system that depends on an adversary's ability to uncover falsehoods is doomed to failure, which is why this kind of conduct must be discouraged in the strongest possible way.

In order to adequately produce a defense, it is crucial that all forms of evidence submitted and obtained be served to me in ample time to mount a defense or to be able to produce evidence to counter it. That is why all papers, motions, and forms, admitted into evidence be served to the other party and a declaration of evidence be turned in as stated by law.

The knowing of this and knowing no declarations of service were turned in on such damning material which was totally false and misleading which if the commissioner followed legal procedure would have found out, should have informed

me, sanctioned Mrs. Rogers lawyer, and excluded if not thrown out the whole case entirely. But instead the commissioner set up, participated in, and condoned inappropriate and forbidden ex parte communication to try and cover it up. This was proven when the bailiff was instructed to allow me to leave the court room first instead of her as normal court procedure allowed, in order for them to talk. **RP 8 14-24** This occurred after I was already given my papers and left. The judge instructed her she better make sure I have certified copies **8.25 and RP? 9 1** It is apparent that I had already left the courtroom by **RP 9 2-5**. And is apparent that it was not in reference to the one page order just given since she clearly makes reference to the two copies meaning plural therefor can only be in reference to the copies, several of evidence that I never was served with and was turned and no declaration of service was ever entered for any. Which is another example of the commissioner's judicial misconduct and collaboration in permitting evidence that clearly violated rules of discovery and court conduct and prevents me from being allowed to participate in and present any kind of defense and makes it impossible to get a fair or impartial trial as guaranteed in the Constitution but tried to help such improprieties be covered up. Otherwise why violated normal court procedure if the real goal was to talk in the hall with a paralegal no violation or problem would occur from that. Her paralegal doesn't have any kind of protection order on me. **RP-8 14 and 15** And why even risk the very question of or give appearance of such improprieties in the first place by allowing it at all. And why was it already set up beforehand which is demonstrated by the bailiff's quest/remarks without anything being stated before which he wouldn't do since it's against normal procedure and court room guidelines in such cases unless he had prior knowledge. And why was anything having to do with case discussed prior to my arrival and without my presence. And just for the record I still haven't been given copies certified or otherwise of anything to date. Which wouldn't really matter because in order to be valid and legal should have been served to me prior to the day before the hearing (when the evidence was turned in). And don't mean anything if done after. And there is still to date no declaration of service for any in record. Which wouldn't have mattered if done after and if not done in the time frame required. And she knew where to serve me because it was her who made reference to my Dad living down the street. **RP6 14-16**, verified to the commissioner it to be true. **RP 7 17-24** Plus, I went to school with her daughter, who is much younger than David and that is why I never met him before. Her daughter and I were in the 2<sup>nd</sup> grade together. And through school together and she spent the night at my house on several occasions growing up. She most certainly knew / knows his address and exact house location. And the only way she could have known were my Dad lived is from Mrs. Rogers. The commissioner also specifically prohibited sanction on an order for protection from harassment which constitutes the same thing as excessive punishment described in the constitution in the fifth amendment.

24)RCW 10.14.080

The court in granting an ex parte temporary antiharassment protection order or a civil antiharassment protection order, shall not prohibit the respondent from the use or enjoyment of real property to which the respondent has a cognizable claim unless that order is issued under chapter **26.09** RCW or under a separate action commenced with a summons and complaint to determine title or possession of real property.

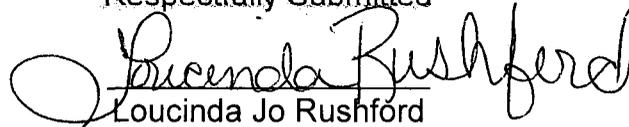
G.

**Conclusion**

For the reasons set forth above the Appellant respectfully requests that the Court vacate the Trial Court's orders.

May 29, 2017

Respectfully Submitted

  
Loucinda Jo Rushford  
Appellant Pro Se