

In the court of appeals Division II

Appellate & Trial Courts

County, Tacoma, Washington

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DIVISION II
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STATE OF WASHINGTON
BY DM
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State of Washington :
Plaintiff-Appellee, : App. Case No. 50199-6
Michelle Gilbert, :
VS :
Defendant-Appellant :
Wanda J. Lee, David G. Lee :

REPLY BRIEF OF PLAINTIFF-APPELLEE, Michelle Gilbert

Appeal from Superior Court of Washington of a Reversible error

Trial Court of appeal Case No. 50199-6

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ARGUMENT

First Assignment of Error_ Back dating with different dates

Second Assignment of Error_ Section H shows Josiah Lee is not incapacitated

Third Assignment of Error_ Dr. Philip McGuiness is not a licensed psychologist; he is only a pediatric doctor.

Fourth Assignment of Error_ Fraud exhibit falsified signature

Fifth Assignment of Error_ Denied modification to request for Josiah back, I'm his mother

STATEMENT OF CASE

The medical report that granted this guardianship turned out to be a irreversible error, it was hiding under the confidential file and, I did not know about it, the guardianship should have not been granted due to evidence hiding under the confidential file, it was granted on April 27, 2011. The GAL submitted a fraud medical report, there is back dating, then in section H of the medical report it shows Josiah Lee is not incapacitated and then Dr. Philip McGuinness was not a licensed psychologist, he is a pediatric doctor. Another thing, Josiah had turned 18 years old on April 26,2011 and therefore how can the court have accepted this report from a pediatric doctor that Josiah was no longer seeing Dr. Philip MCGuinness due to his legal age.

Judge Roger Bennett granted this guardianship and he made a irreversible error and now, I am asking the higher court to please reverse this and allow me to modify to request for Josiah Lee back because the court took him from me for no reason. Other Judges made false accusations against me and my son has been suffering from being apart from me for no reason and he's been apart from his own brother for no reason and I miss Josiah and the boys miss each other and it's not okay to take Josiah from his own mother for no reason its cruel and mean. I have not been able to pay for the filing fee to have it reviewed by the higher court to get this case corrected, I now have extra money so I could pay the filing fee to get the case corrected by the higher court. Please let me modify and request for Josiah back? Apparently my parents did a default exhibit behind my back in April 27, 2011 they falsified my signature; I never signed this exhibit that was done behind my back. I didn't know about it at all and I never agreed for my parents to have guardian over my son, they kidnapped him from me and I've asked for my son back several times. I'm being denied on modifying to request for my son back for no reason.

The Superior Court of Washington erred by hiding the medical report under the confidential file and it was never given to me to be able to defend properly and more fair.

Issue(s) Presented for Review and Argument_ Correcting the Irreversible Error the fraud medical report and the denial of modification, the fraud default exhibit was falsified and the denial of modification to have Josiah return to his mother.

Conclusion

I would like the higher court to correct Judge Collier for this Irreversible Error the fraud medical report and reverse the denial modification so, I can request for my son Josiah Lee back. I'm his mother. The court took my son away from me for no reason.

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Submitted by Michelle Gilbert

