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Division II
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No. 51048-1-II

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

ROBERTA SINOPOLE,

Appellant,

v.

PATRICK SINOPOLE,

Respondent.

ON APPEAL FROM KITSAP COUNTY SUPERIOR COURT
Honorable Sally Olsen

APPELLANT'S REPLY BRIEF

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I. INTRODUCTION

Robbie has challenged in general, and in many particulars, the court's orders effecting a dissolution of this long-term marriage of 25 years. In his responsive brief, Patrick makes many assertions that are either simply wrong or not supported by the evidence. For example, Patrick asserts that "Ms. Sinopole contends the trial court failed to value anything." See Br. Respondent, at 20. Robbie clearly identified a specific list of items the trial court failed to value, while acknowledging the trial court did value other property, which are included on the spreadsheet adopted by the trial court.

The trial court erred by undervaluing Patrick's gross monthly income at the time of trial by more than \$5,000 per month, substantially prejudicing the child support and maintenance required statutory analysis.

Despite a marriage dissolution trial being an adversarial proceeding, the dissolving of a fiduciary relationship, like a marriage, which also involves the welfare and support of children, demands that the parties fully and fairly disclose the true nature and extent of their income, assets and liabilities. Patrick's pay stubs alone, for 2017, showed a gross monthly income \$2-3,000 per month higher than found by the trial court. His employment contract with Tacoma Anesthesia Associates showed a gross monthly income of \$30,000 per month for 2017, which is more than

\$5,000 per month higher than the court found when it put his gross monthly income at \$24,582.06.

Once again, Patrick is attempting to confuse the court to the significant detriment of Robbie through blatant misstatements, half-truths and raising prejudicial and irrelevant matters. In addition to the above examples, Patrick chose to raise parenting issues in an improper attempt to interject fault, bias and prejudice into this financial analysis.

II. REPLY TO COUNTERSTATEMENT OF FACTS

As acknowledged by Patrick, the parenting plan has not been appealed. Therefore, his attempt to include and designate the findings and conclusions on parenting plan and the final parenting plan as part of his responsive brief is a blatant attempt to improperly interject fault, bias and prejudice against Robbie. See Br. Respondent, at 1.

Patrick has intentionally incorporated findings made by the Court in his brief with regard to Robbie, which are wholly irrelevant to the issues on appeal.

The trial court made an undisputed finding that Amelia is close to Robbie, has a good relationship with her and that Robbie can provide her with the love, support and direction she needs. CP 1669. The trial court further found that Roberta is a good parent to Amelia. CP 1669.

It is undisputed the trial court made no finding in the final parenting plan under RCW 26.09.191, which encompasses, but not limited to: abandonment, neglect, child abuse, domestic violence, assault, sex offense or any other problem that may harm the children's best interest against either parent. CP 1674.

Despite Patrick being a medical doctor (anesthesiologist) the trial court granted sole decision making regarding non-emergency health care to Robbie. CP 1675.

Despite the trial court ordering Robbie to stop seeing her domestic violence counselor, it is undisputed the counselor testified that Robbie was a victim of domestic violence and suffered emotional, economic, and sexual abuse by Patrick. CP 1655.

The trial court made undisputed findings that Dr. Whitehill reported Patrick's conduct towards Roberta has been "less than stellar," and he exhibited traits that have caused difficulties in interpersonal relationships, and he would benefit from individual counseling to broaden his coping repertoire and to understand his role in the conflict with Robbie. CP 1667.

The trial court made undisputed findings that Patrick was found in contempt several times for not complying with the trial courts orders. CP 1660.

III. ARGUMENT IN REPLY

A. The consideration of marital misconduct is explicitly prohibited in RCW 26.09.080.

It is obvious from the record that Patrick had his own parental deficits, trouble following the trial court's orders and fault for the failure of the marriage. These faults were not raised in our opening brief, other than his contemptuous violations of the trial court's orders, because it is improper to raise marital fault.

B. The trial court's determination of Patrick's income was not supported by the evidence available at the time of trial and violated RCW 26.19.071(1).

Patrick argues in his responsive brief that his net monthly income was a mere \$13,364.29 and is supported by the evidence. See Br. Respondent, at 12. However, RCW 26.19.071(2) requires, "Tax returns for the preceding two years **and current paystubs shall be provided to verify income and deductions**. Other sufficient verification shall be required for income and deductions which do not appear on tax returns or paystubs." RCW 26.19.071(2). (emphasis added).

The trial court violated the statutory requirement of relying upon current pay stubs to verify Patrick's income by not considering his 2017 pay stubs since trial began in May 2017. Instead, the trial court relied upon a 2016 W-2 and was inconsistent with his current 2017 pay stubs, his

testimony and employment contract as described Patrick and Ken Wilson.
06/07/2017 RP 110.

This court reviews a trial court's order of child support for abuse of discretion, or misapplication of the law. *In re Marriage of Griffin*, 114 Wash.2d 772, 776, 791 P.2d 519 (1990); *Markoff v. Markoff*, 27 Wash.2d 826, 828, 180 P.2d 555 (1947).

“All income and resources of each parent's household shall be disclosed and considered by the court when the court determines the child support obligation of each parent.” RCW 26.19.071(1). “[M]onthly gross income *shall include* income from any source,” including: salaries, wages, deferred compensation, dividends, interest, bonuses, income from a business. RCW 26.19.071(3) (emphasis added). It is notable to point out that according to his 2016 tax return, Patrick’s total income was \$465,305, or \$38,775 per month. CP 1422. Patrick’s total adjusted gross income after deducting the \$90,000 he paid Robbie in maintenance for 2016, was \$375,305, or \$31,275 per month. CP 1422.

To calculate net monthly income, RCW 26.19.071(5) instructs courts to deduct:

- (a) Federal and state income taxes;
- (b) Federal insurance contributions act deductions;
- (c) Mandatory pension plan payments;
- (d) Mandatory union or professional dues;
- (e) State industrial insurance premiums;
- (f) Court-ordered maintenance to the extent actually paid;

(g) Up to five thousand dollars per year in voluntary retirement contributions actually made if the contributions show a pattern of contributions during the one-year period preceding the action establishing the child support order unless there is a determination that the contributions were made for the purpose of reducing child support; and
(h) Normal business expenses and self-employment taxes for self-employed persons. Justification shall be required for any business expense deduction about which there is disagreement.

Child support worksheets are mandatory, but RCW 26.19.071(1) does not require that the court make a precise determination of income. Instead, the court is required to consider all income and resources of each parent's household.” *In re Marriage of Marzetta*, 129 Wash.App. 607, 623, 120 P.3d 75 (2005), *abrogated on another ground by In re Marriage of McCausland*, 159 Wash.2d. 607, 619, 152 P.3d 1013 (2007). We must presume that the court considered all evidence before it in fashioning the order. *In re Marriage of Kelly*, 85 Wash.App. 785, 793, 934 P.2d 1218 (1997) (affirming a postsecondary support order).

RCW 26.19.071(1) requires only that “[a]ll income and resources ... shall be disclosed and *considered*,” subsection (3) lists sources of income that “monthly gross income *shall include*.” RCW 26.19.071 (emphasis added). It is not enough to *consider* all sources of income, courts must *include* the sources listed in RCW 26.19.071 (3).

The attendant child support worksheet must include each source of income listed in subsection (3) of RCW 26.19.071, for which the evidence clearly shows that the source of income exists. To exclude an entire category of income is a misapplication of RCW 26.19.071(3).

A trial court's categorical exclusion of a source, or sources, of income will rarely be harmless given RCW 26.19.080(1). That statute provides, "The basic child support obligation derived from the economic table shall be allocated between the parents based on each parent's share of the combined monthly net income." Thus, even when the parents' combined monthly net income exceeds the economic table in RCW 26.19.020, as is the case here, the relative increase in one party's income causes a formulaic increase in the portion of the basic child support obligation for which that party is responsible. For any error in calculating a party's gross monthly income, RCW 26.19.080(1) defines the resulting prejudice. A court might find such prejudice negligible, but never nonexistent. Had the trial court included the additional \$5,000 per month in Patrick's gross annual income, he would be responsible for a larger portion of the basic child support obligation. The error is not harmless.

C. The trial court erred in awarding Robbie maintenance of only \$5,000 per month for only six (6) years.

The same income analysis applies to the trial court's award of spousal maintenance. It would be almost impossible for Patrick to claim that the omission of an additional \$60,000 in income per year would not have substantially lowered Robbie's maintenance award in violation of RCW 26.09.090.

It is a manifest abuse of discretion to only award \$5,000 a month for six years to the disadvantaged spouse when the advantaged spouse¹ is earning almost \$35,000 gross per month in salary (\$30,000) and retirement pay (\$4,761). CP 370, 639. Ken Wilson writes, "On January 4, 2017 his Employment Agreement was amended to \$30,000.00/month gross income for the period from January 4, 2017 to January 4, 2018 or \$360,000.00 per year gross."².

¹ This is a long-term marriage of more than 25 years. CP120. Robbie, 54 years old at the time of trial, gave up her own professional career as an attorney and reservist in the United States Marine Corps. CP 120. Robbie was forced to move many times around the world and across the country to support Patrick's successful naval career. 05/08/17 RP 11, 14, 15, 56 and 89. She successfully homeschooled the parties' 4 children while the advantaged spouse enjoyed a successful naval and medical career.

²Ken Wilson was appointed by the trial court by agreement of both parties to conduct a detailed forensic accounting of the parties' finances and marital estate. CP 94. The trial court initially reserved ruling on the admission of Ken Wilson's report to allow Patrick's attorney to file a motion to exclude the report. 05/24/17 RP 43. After hearing argument, the trial court denied Patrick's motion to exclude the report. 06/20/17 RP 2-10. The trial court ruled that Patrick's arguments go to weight and not admissibility. 06/20/17 RP 2-10. In his closing argument, counsel for Robbie handed the trial court Ken Wilson's report and went through the salient details. 06/23/17 RP 4.

Patrick never gave a rational explanation as to why his pay stubs from Tacoma Anesthesia did not match with his employment contract. Patrick acknowledged that his employment contract paid him \$30,000 per month gross beginning January 2017. 06/07/2017 RP 110.

D. Patrick's Vanguard Roth IRA is an omitted asset.

Patrick argues that Robbie's argument regarding the Vanguard Roth IRA should be rejected because it is "difficult to follow". See Br. Respondent, at 14. It is not and this is not a legal defense.

- 1) On February 27, 2015, Patrick removed \$33,718 in community funds post-separation from his Vanguard Roth IRA. 05/23/17 RP at 161. CP 358-359, 1408, 1524.
- 2) Patrick incorrectly argues that this asset *is* listed on the asset and liability spreadsheet the trial court adopted for the property distribution when in fact it is not. See Br. Respondent, at 14-15, CP 124. There are numerous Vanguard accounts listed, but Patrick's Vanguard *Roth IRA* is not. CP 124. (emphasis added).
- 3) This is an omitted asset.

E. The funds related to the Quigley van and insurance proceeds from the auto collision are omitted assets.

Patrick is attempting to unnecessarily confuse this court as he

obviously did the trial court. This issue is simple. Patrick traded in a \$20,000 community asset (Quigley van) to purchase a separate asset (Toyota Tundra) post-separation. The \$20,000 community asset is either unaccounted for as directly related to the Quigley van, or only partially accounted for by the trial court in the line item 48 of the spreadsheet adopted by the trial court listing the value at \$10,694. CP 124. Under either analysis, the trial court erred to the detriment of Robbie.

F. The funds from the sale of the tractor and various personal property items are omitted assets.

Pursuant to Ken Wilson's investigation, Patrick used the tractor proceeds to make a payment on his Cabella's visa card in the amount of \$4,382.73 on 03/31/16, a community mortgage payment of \$3,694.27 towards the Mount Airy property, and a payment on Patrick's Visa card ending in 3165 in the amount of \$15,332.24 on 04/08/16. CP 360

The charges made on Patrick's Visa card ending in 3165 were majorly post-separation charges to include two, \$7,500 payments (totaling \$15,000) to McKinley Irvin (his counsel) on 03/10/16 and 03/30/16. CP 1297.

In reply to the personal property, again, Patrick has confused this and is minimizing the assets of this large marital estate. We agree that it is not common to value personal property such as photo albums and broken

furniture and then allocate them. See Br. Respondent, at 17. However, in this case, the parties had significant personal property at their farm and obtained an appraisal service to value the items of personal property. To state that these items are “junk” value is misleading when the evidence states this personal property has a value of \$33,230 per Stokes Appraisal. CP 1238-1250.

G. The trial court’s overall property distribution of 37% to the disadvantaged spouse is a manifest abuse of discretion and not within the range of evidence presented.

The trial court stated in its memorandum opinion that the Court finds “...that it is just and equitable to divide the remaining assets evenly as of the date of separation.” CP 121. Instead, the trial court awarded Robbie 37% of the marital estate. Br. Appellant Op., Appendix A. It’s a manifest abuse of discretion to award the disadvantaged spouse only 37% of the community property.

Patrick does not contest the assertion that he was awarded a disproportionate share of the community property, nor does he address that the spreadsheet adopted by the trial court awards half of his separate debt of \$10,014 (Navy Federal Loan / 2017 Volkswagen GTI) at line item 62 of the spreadsheet to Robbie in the overall property distribution. CP 125.

If the trial court intended a 50/50 division of the community of assets as stated in its ruling, it made substantial, factual, mathematical and legal errors.

Patrick's facile and non-substantive response to Robbie being saddled with a massive 2016 tax liability is not persuasive. Patrick fails to contest the trial court's unsupported value of \$87,000 used on the spreadsheet (line 63) in the trial court's calculations to divide the overall community property 50/50. CP 125. Patrick also fails to respond to the specific tax liability on capital gains (part of 2016 tax debt) that was assigned to Robbie by the trial court.

The issue of this tax liability incurred on the sale of community assets is particularly troubling. For example, the trial court awarded Robbie a purported \$116,383.00 of her Roth IRA #5505 as of the date of separation, and \$45,316 from her Roth IRA #5541 as of the date of separation. CP 124. However, \$86,679 was withdrawn in 2016 out of Robbie's Roth IRA. CP 1465. These funds were substantially spent on Robbie's attorney's fees and over \$42,000 distributed directly to Patrick. CP 365. So not only is Robbie assigned her two Fidelity Roth IRAs as full assets on the trial court's spreadsheet totaling \$161,699 (Lines 29 and 30 of spreadsheet), of which \$42,000 went to Patrick, but she is having to pay the tax liability on the \$42,000 that went directly to Patrick. Despite the substantial disparity in

earning capacity, the trial court forced Robbie to pay all of her own fees and some of Patrick's out of these assets awarded to her as of date of separation on the trial court's property spreadsheet. CP 124-125.

Instead, he does an all-encompassing argument that the trial court cannot distribute all assets and debts in parts and must consider everything as a whole. See Br. Respondent, at 19. This is non-responsive.

The trial court erred when it omitted and/or failed to value, characterize and dispose of significant community assets and debts as mentioned in opening brief at 27-28. This is a manifest abuse of discretion. Patrick does not even address the omitted Keystone Travel Trailer and Custom Horse Trailer in the combined amount of \$11,100. See Br. Opening, at 39.

Further, Patrick will continue to be a very high earner as an anesthesiologist. Robbie's future is much more tenuous and uncertain. It is not realistic to believe that she could simply re-enter the workforce an attorney at the age of 53 having not practiced law for almost 25 years. And, if she did, she would not be earning a high salary. She is not even licensed to practice in the State of Washington and was given no funds for retraining.

H. The trial court's Valuation of Patrick's TSP was a manifest abuse of discretion.

Considering the disproportionate award of the marital estate to the

advantaged spouse (63%) makes the date of valuation of Patrick's TSP particularly damaging to Robbie, as the disadvantaged spouse. Ex. 568 admitted on 06/05/17. CP 1350.

The trial court valued Patrick's TSP at \$183,356.43 on July 10, 2015. CP 124. Pursuant to the TSP statement dated 03/31/17, admitted as Exhibit 568, the value was \$216,718.76 which is \$33,363 more than the trial court found on its final property division spreadsheet. CP 1350. Patrick's statement that the figure of \$33,363 is speculative and not in the record is simply false.

In fact, counsel for Patrick argued to the trial court, "...but of course it [Patrick's TSP] would be subject to gains or losses, *which is the standard when you are dividing a retirement*. It's going to fluctuate every day, so we use a date of separation. *And if there has been gains in that amount, that would be divided.*" Emphasis added. 6/8/17 RP 33. The trial court ignored the statement of Patrick's counsel proposing the gains and losses to be evenly divided at time of trial, as opposed to separation and still awarded 100% of the gains to the advantaged spouse, Patrick. Under the overall factual situation presented at trial, this is manifest abuse of discretion and is not fair nor equitable. It is also strong evidence the trial court's bias against Robbie since this was specifically offered by Patrick's attorney and rejected out of hand by the trial court.

I. The trial court failed to value and properly characterize numerous and substantial assets and liabilities.

Patrick argues, “Ms. Sinopole contends the trial court failed to value anything. This argument should be rejected...” Br. Respondent, at 20. Robbie specifically delineated the items that the trial court failed to value. She acknowledges that the trial court did value some of the marital estate as set forth in the spreadsheet attached to its ruling. At no time, has Robbie alleged that the trial court failed to value anything.

A fiduciary duty does not cease upon contemplation of the dissolution of a marriage. Robbie had little knowledge of her husband's financial affairs. Patrick had a fiduciary duty to truthfully and honestly disclose all community assets and debts as well as separate property and debts incurred prior to dissolution. *Seals v. Seals*, 22 Wn.App. 652, 655, 590 P.2d 1301 (1979).

J. The post-separation Navy Federal Loan was allocated 50/50 to Robbie, which is a manifest abuse of discretion by the trial court.

Patrick misleadingly asserts that the trial court did not assign any of the post-separation Navy Federal loan of \$10,014 to Robbie when the spreadsheet adopted by the trial court attempts to make an exact 50/50 distribution of assets and debts, which included this loan as a line item. See Br. Respondent, at 20; see also CP 1602, Line 62. To remind the

court, this is a post-separation consumer debt taken out by Patrick in December 2016. CP 1292.

Line item 68 of the spreadsheet adopted by the trial court at CP 125, where the trial court is attempting to make a 50/50 division of the marital estate encompasses the \$10,014 effectively awarding Robbie one-half of his post-separation debt. CP 125.

K. Attorney's fees were warranted to Robbie.

A trial court has broad discretion to award attorney fees in a dissolution action under RCW 26.09.140. *In re Marriage of Fernau*, 39 Wn. App. 695, 708, 694 P.2d 1092 (1984). The court must balance the need of the requesting party against the other party's ability to pay. *In re the Marriage of Mattson*, 95 Wn.App. 592, 604, 976 P.2d 157 (1999). The party challenging an award bears the burden of proving that the trial court exercised this discretion in a way that was clearly untenable or manifestly unreasonable. See *In re Marriage of Crosetto*, 82 Wn. App. 545, 563, 918 P.2d 954 (1996).

There remains a large chasm between the current and future earning capacity of Patrick versus the future earning capacity of Robbie. Based upon the foregoing arguments and facts presented at trial, Robbie desperately has the need for an attorney fee award and Patrick certainly has the ability to pay. Patrick never disputes this fact. Br. Respondent, at 21.

As mentioned above, Robbie essentially paid all of her own attorney's fees out of her share of the community property, but \$30,000 of Patrick's attorney's fees as well out of her Fidelity Roth IRA. CP 423.

L. The trial court is biased.

Patrick fails to address the appearance of fairness doctrine and fails to deny that it has been violated. The only argument made by Patrick is that Robbie did not like the outcome and behaved badly, in his opinion. Br. Respondent, at 21. As noted above, fault is not to be considered in a property, debt, maintenance and fee award analysis.

The nature and extent of the trial court's errors in determining Patrick's income and wholesale adoption of Patrick's proposed property and debt spreadsheet with no corrections or changes whatsoever is strong evidence of the trial court's inherent bias of Robbie.

M. Entitled to fees on appeal.

There is no basis in law or fact to award attorney's fees under RAP 18.1(a) and his request should be denied. As noted in her opening brief, Robbie is the party who should be awarded fees on appeal.

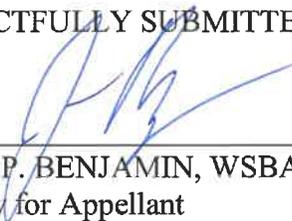
IV. CONCLUSION

For the foregoing reasons, Robbie asks this Court to vacate the maintenance, property distribution, child support and worksheets and to remand to a new trial court to consider all of the evidence as to

characterization, valuation and disposal of all property brought before the court and for the trial court to consider the mandatory factors relevant and necessary to the analysis of the maintenance, property distribution and child support issues. Robbie also requests her fees.

Dated this 31 day of January, 2019.

RESPECTFULLY SUBMITTED,



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CERTIFICATE OF SERVICE

I certify that on the 31 day of January, 2019, I caused a true and correct copy of this Appellant's Reply Brief to be served on the following in the manner indicated below:

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