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No. 51551-2-II

**Court of Appeals, Div. II,
of the State of Washington**

In re Marriage of Sperry,

Daniel Sperry,

Appellant,

v.

Liberty Sperry (n/k/a Liberty Weaver),

Respondent.

Reply Brief of Appellant

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1. Introduction

The trial court's decision in this case was an abuse of discretion. The trial court ordered restrictions under RCW 26.09.191(3)(f) that were not reasonably calculated to prevent the identified harm; made factual findings based on unfounded allegations and evidence that did not exist; and used those findings and restrictions to minimize Sperry's role in his daughter's life.

Sperry's opening brief pointed out all of these abuses of the trial court's discretion. Weaver's response boils down to a single argument: that every provision of the new parenting plan was within the trial court's discretion under RCW 26.09.187. Weaver is wrong.

When, as here, a trial court chooses to impose limitations under § 191, those limitations must be reversed if they are not reasonably calculated to prevent the identified harm. The limitations imposed on Sperry were not reasonably related to the only § 191 finding the trial court made. The trial court's other findings were not supported by substantial evidence.

This Court should reverse the restrictions, findings, and parenting plan and remand for a new plan with Sperry as primary residential parent and no limitations on his time with his daughter.

2. Reply Argument

2.1 This Court should reverse all RCW 26.09.191(3) restrictions that are not reasonably calculated to prevent harm that could be caused by Sperry withholding R.S. from Weaver.

Sperry's opening brief argued that the trial court abused its discretion in imposing restrictions on him and on his time with R.S. under RCW 26.09.191(3) that were not reasonably related to the trial court's § 191 findings. Br. of App. at 2-3, 17-25. A trial court is only permitted to impose restrictions under § 191(3) that are reasonably calculated to prevent the harm identified in the trial court's § 191 findings. Br. of App. at 17-18; *In re Marriage of Chandola*, 180 Wn.2d 632, 648, 327 P.3d 644 (2014). The trial court's only finding against Sperry was that he had withheld R.S. from Weaver under RCW 26.09.191(3)(f).¹ Br. of App. at 18; CP 69-70.

The trial court abused its discretion in imposing three completely unrelated restrictions on Sperry: 1) requiring Sperry to undergo a psychological evaluation for sexual issues, *see* Br. of App. at 19-20; 2) withholding visitation from Sperry until he completes and reports the results of the evaluation, *see* Br. of App. at 20-22; and 3) limiting Sperry's visitation with R.S. both in amount of time, *see* Br. of App. at 22-24, and in location, *see*

¹ Sperry also contends that even this finding is not supported by substantial evidence. Br. of App. at 29-32, and below at Part 2.2.2.

Br. of App. at 24-25. Each of these restrictions is an abuse of discretion because they are not reasonably related to the trial court's lone § 191(3) finding and are otherwise based on untenable grounds or reasons.

Weaver's response misreads the trial court's order and entirely misses the point of *Chandola*. Weaver would have this Court hold that all of the trial court's restrictions on Sperry and his visitation were reasonable under RCW 26.09.187. However, the trial court foreclosed that option when it entered a final parenting plan that expressly placed limitations on Sperry under RCW 26.09.191. Under *Chandola*, any time a trial court orders limitations under RCW 26.09.191, those limitations must be analyzed under § 191, not under § 187. *Chandola*, 180 Wn.2d at 644.

The final parenting plan sets forth the problematic limitations in Part 4, entitled, "Limitations on a parent":

4. Limitations on a parent

The following limits or conditions apply to DANIEL SPERRY.

Limited contact as shown in the Parenting Time Schedule below.

Evaluation or treatment required. DANIEL SPERRY must:

- a. Complete an evaluation with a qualified psychiatrist or psychologist who has complete

information regarding the Petitioner's admissions as outlined by the Memorandum Decision re: Modification of Parenting Plan, filed June 21, 2017.

b. Provide a copy of the evaluation to: the Court and the mother.

If this parent does not complete the evaluation, then:

Visitation under the Parenting Time Schedule (Section 9) will not commence.

CP 70 (formatting as in original). This list of limitations is immediately preceded by Part 3, entitled, "Reasons for putting limitations on a parent (under RCW 26.09.191)":

3. Reasons for putting limitations on a parent (under RCW 26.09.191)

a. Abandonment, neglect, child abuse, domestic violence, assault, or sex offense.

... [the only proposed finding under this section was stricken out by the trial court]

b. Other problems that may harm the child's best interests:

A parent has one or more of these problems as follows:

Withholding the child – DANIEL SPERRY has kept the other parent away from a child listed in **2.** for a long time, without good reason.

CP 69-70 (formatting as in original). The plain language of the parenting plan demonstrates that **all** of the limitations in Part 4 were imposed under RCW 26.09.191, for the reasons stated in Part 3.

In *Chandola*, the Washington Supreme Court clarified the difference between the trial court’s general discretion to establish a residential schedule under RCW 26.09.187 and the limitations that a trial court may impose under RCW 26.09.191:

Practically speaking, a court can substantially restrict a parent’s contact with his or her child simply by establishing a residential schedule pursuant to its discretion under RCW 26.09.187.

But that is not what the court did with the challenged restrictions here; instead, it proceeded under RCW 26.09.191(3). The “limitations” in that statute are fundamentally different from the provisions necessary to every parenting plan under RCW 26.09.187. Restrictions on a parent’s geographic location, for example, are not authorized as typical parenting plan provisions under RCW 26.09.187. They are instead imposed under RCW 26.09.191(3). Similarly, restrictions on a parent’s travel or conduct can be imposed only under RCW 26.09.191—not as features of the parenting plan under RCW 26.09.187.

Chandola, 180 Wn.2d at 644-45 (citations omitted). Here, as in *Chandola*, the trial court chose to impose limitations under § 191. Such limitations must be analyzed under the requirements of that section.

The statute provides, “A parent’s involvement or conduct may have an adverse effect on the child’s best interests, and the court may preclude or limit any provisions of the parenting plan, if any of the following factors exist...” RCW 26.09.191(3). The

supreme court explained that RCW 26.09.191(3) bars the trial court from restricting parental conduct unless the evidence shows, and the trial court finds, that a parent's conduct may have an adverse effect on the child's best interests. *Chandola*, 180 Wn.2d at 642. A trial court abuses its discretion if it imposes a restriction that is not reasonably calculated to prevent the harm identified in the trial court's § 191 findings. *Chandola*, 180 Wn.2d at 648.

This Court cannot affirm the trial court's parenting plan provisions as reasonable under RCW 26.09.187 because the trial court expressly imposed limitations under RCW 26.09.191(3). This Court must analyze the limitations under the standard of § 191(3). Each of the trial court's limitations on Sperry fails under that standard. The trial court abused its discretion. This Court should reverse all of the trial court's limitations on Sperry and remand for a new parenting plan.

2.1.1 The trial court abused its discretion in ordering Sperry to undergo a psychological evaluation for sexual issues.

The trial court did not enter any finding that Sperry's reported sexual thoughts had any probability of harming R.S. Br. of App. at 19; CP 69-70. Sperry argued that without a finding, the trial court's requirement that he undergo a

psychological evaluation was manifestly unreasonable and based on untenable grounds. Br. of App. at 19-20.

Weaver's only argument—that the evaluation is reasonable under RCW 26.09.187—fails for the reasons stated above. This is not a § 187 question. The parenting plan imposes the requirement of a psychological evaluation under § 191. It is not reasonably related to any § 191 finding. Therefore it was an abuse of discretion.

Weaver fails to explain how an order to get a psychological evaluation could fall within a trial court's discretion under § 187. In truth, while a trial court can limit a parent's **contact** with a child under § 187, it can only limit a parent's **conduct** under § 191. *Chandola*, 180 Wn.2d at 642, 644-45 (citing RCW 26.09.191(3)); *In re Marriage of Katare*, 175 Wn.2d 23, 35-37, 283 P.3d 546 (2012); *In re Marriage of Wicklund*, 84 Wn. App. 763, 770-72, 932 P.2d 652 (1996)).

Weaver attempts to bolster her argument by claiming “there was ample evidence to support such a finding that the evaluation is necessary.” Br. of Resp. at 9. But the trial court never made any such finding! This Court can only conclude from the absence of any finding of fact expressly related to Sperry's prior sexual thoughts that the trial court concluded, by the time the final orders were entered, that there was **not enough evidence** to support such a finding.

Weaver does not attempt to argue that the psychological evaluation is justified by the trial court's § 191 findings. It is not.

The trial court's requirement that Sperry undergo a psychological evaluation for sexual issues is not reasonably related to the trial court's only § 191 finding (withholding) and was therefore an abuse of discretion. This Court should reverse the requirement of a psychological evaluation.

2.1.2 The trial court abused its discretion in conditioning Sperry's visitation rights on completion of the psychological evaluation.

Sperry argued that conditioning his visitation on completion of the psychological evaluation was an abuse of discretion for the same reasons. Br. of App. at 20. Additionally, the trial court failed to consider the fundamental importance of the relationship between Sperry and R.S. or Sperry's constitutional right to be involved in parenting his child before imposing a restriction that effectively eliminates Sperry's residential time with R.S. Br. of App. at 21-22.

Weaver argues that Sperry's weekend visitation is not limited by the requirement for a psychological evaluation. Sperry has confirmed to counsel that he is, in fact, currently exercising weekend visitation. This is consistent with the trial court's memorandum opinion. CP 68. So long as the parties continue to interpret the final parenting plan to bar only

Sperry's summer visitation, the arguments in Sperry's opening brief regarding elimination of his visitation (in Br. of App., Part 4.2.2, beginning with "Additionally, ...") do not apply.

However, the limitation of Sperry's summer visitation pending completion of a psychological evaluation remains an abuse of discretion for the reasons stated in Part 4.2.1 of Sperry's opening brief and in Part 2.1.1, above, of this Reply. The trial court expressly did not find any sexual abuse or other sexual danger under RCW 26.09.191. The requirement of a psychological evaluation for sexual issues was an abuse of discretion because it is not reasonably related to any § 191 finding. Any limitation based on the psychological evaluation is an abuse of discretion for the same reasons. This Court should reverse the limitation on Sperry's summer visitation with R.S.

2.1.3 The trial court abused its discretion in limiting Sperry's visitation to every other weekend and half the summer, with no holidays or school breaks.

Sperry argued that the trial court's limitation of his residential time with R.S. to every other weekend and half the summer, with no holidays or school breaks was not reasonably related to the finding that he had withheld R.S. Br. of App. at 22-24. The withholding came as a direct result of the parties' original intent and the problematic drafting of the original parenting plan. Br. of App. at 22-23. Limiting Sperry's time with

R.S. does not reasonably protect against any danger of future withholding. Br. of App. at 23-24. This limitation is, in reality, nothing more than the trial court's way of punishing Sperry for the withholding, which is itself an abuse of discretion. Br. of App. at 24; *In re Marriage of Thompson*, 56 Wn.2d 244, 250, 352 P.2d 179 (1960) ("The custody of the child is not to be used as a reward or punishment for the conduct of the parents").

Weaver argues, incorrectly, that the limitations on Sperry's visitation schedule are reasonable under RCW 26.09.187 and are not imposed under RCW 26.09.191. As demonstrated above, the trial court expressly imposed this limited time schedule under § 191. In Part 4 of the parenting plan, the trial court's § 191 limitations include "Limited contact as shown in the Parenting Time Schedule below." CP 70. The Parenting Time Schedule gives Sperry visitation every other weekend and half the summer, with all holidays granted to Weaver. CP 71. The language of the parenting plan demonstrates that **all of the limitations** in the Parenting Time Schedule are based on RCW 26.09.191. There is nothing in the record to suggest otherwise.

Weaver does not even attempt to argue that the limited parenting time is reasonably related to the trial court's § 191 finding of withholding. In fact, she seems to agree with Sperry that it is not. Br. of Resp. at 8 ("The trial court did *not* find that

due to Mr. Sperry's withholding of the child pursuant to RCW 26.09.191(3)(f), the residential schedule would be more restrictive."). Because the limited contact in the parenting time schedule was imposed under § 191 but is not reasonably calculated to prevent the harm from any § 191 finding, it was an abuse of discretion. This Court should reverse the Parenting Time Schedule and remand for a new schedule without limitations.

2.1.4 The trial court abused its discretion in restricting Sperry's weekend visitation to within 25 miles of Weaver's residence.

Sperry argued that the trial court's restriction on his travel while on weekend visitation with R.S. was not reasonably calculated to prevent future withholding, particularly where the withholding found by the trial court occurred within a short distance of Weaver's residence. Br. of App. at 24-25.

Again, Weaver attempts only to justify the limitation under RCW 26.09.187, which does not apply. Again, she appears to agree that the restriction is not related to the finding of withholding. Br. of Resp. at 13 ("This provision as to 25 miles is within the trial court's discretion under RCW 26.09.187 and wholly unrelated to the findings of the trial court under RCW [26].09.191(3)(f).").

The trial court imposed limitations on Sperry under RCW 26.09.191, including “Limited contact as shown in the Parenting Time Schedule.” CP 70. The Parenting Time Schedule limits Sperry’s weekend visitation to “within 25 miles of Liberty Weaver’s residence.” CP 71. “Restrictions on a parent’s travel or conduct may only be imposed under RCW 26.09.191—not as features of the parenting plan under RCW 26.09.187.” *Chandola*, 180 Wn.2d at 645.

This Court must analyze the 25-mile restriction under § 191. The restriction is not reasonably calculated to prevent future withholding of R.S. The trial court abused its discretion. This Court should reverse the restriction.

2.2 This Court should reverse all of the trial court’s findings that were not supported by substantial evidence. This Court should also reverse any conclusions based on the unsupported findings.

Sperry’s opening brief argued that at least four factual findings made by the trial court were not supported by substantial evidence. Br. of App. at 25-36. The four findings, and any conclusions based on them, should be reversed. Br. of App. at 25-26.

The following findings were not supported by substantial evidence: 1) that Sperry provided an unsafe environment for R.S., *see* Br. of App. at 26-28; 2) that Sperry kept R.S. away from Weaver “for a long time, with no good reason,” *see* Br. of App.

at 29-32; 3) that Sperry is less likely to encourage a relationship between the mother and child, *see* Br. of App. at 33-34; and 4) that Weaver had a stronger relationship with R.S. and performance of parenting functions, *see* Br. of App. at 34-36.

2.2.1 The trial court erred in finding that Sperry provided an unsafe environment for R.S.

Sperry's opening brief took issue with the trial court's findings at CP 93, ¶¶ 4-5, which imply that Sperry provided an unsafe environment for R.S. Br. of App. at 26-28. To the extent the trial court's finding that the "current living situation" is harmful refers to the problems created by the original parenting plan, the finding was necessary to justify a modification, and Sperry does not object. *See* Br. of App. at 27.

However, to the extent the trial court intended these findings as implying that Sperry's past sexual thoughts pose a present danger to R.S., they are not supported by substantial evidence and should be reversed. Br. of App. at 27-28. Weaver's allegations of danger to R.S. were investigated multiple times by multiple child protection agencies and always came back unfounded. Br. of App. at 28; RP 216. Even Weaver herself testified that she did not believe Sperry posed a danger. RP 57. Unfounded allegations do not provide substantial evidence of

potential harm to a child. Br. of App. at 28; *In re Marriage of Watson*, 132 Wn. App. 222, 233-34, 130 P.3d 915 (2006).

Weaver argues, incorrectly, that these findings are supported by evidence of domestic violence and sexual thoughts and behaviors.² As noted above, the trial court expressly did not find any sexual abuse or domestic violence under RCW 26.09.191. *See* CP 69. If the trial court felt there was sufficient evidence to support a finding of danger to the children, it would have made such a finding under § 191. The trial court was “concerned” by the evidence, but apparently did not find the evidence sufficient to find more likely than not that Sperry had engaged in domestic violence or sexual abuse. The trial court’s nebulous “concerns,” insufficient to support any specific finding, cannot support any conclusions regarding limitations under § 191 or residential provisions under § 187.

To the extent the trial court intended these findings to refer to any harm from Sperry’s past, reported sexual thoughts, they are not supported by substantial evidence and must be

² Weaver argues that the trial in this matter was the first time the sexual issues were “meaningfully adjudicated.” It is unclear what Weaver means by this, but in any event her assertion is immaterial to the outcome of this appeal. The truth remains that the trial court expressly did not find any sexual abuse or domestic violence under RCW 26.09.191. The trial court cannot justify restrictions against Sperry on the basis of a back-door, phantom finding that does not state any specific danger to R.S.

reversed. To the extent any limitations or residential provisions are based on Sperry's past, reported sexual thoughts or alleged domestic violence, they must also be reversed.

2.2.2 The trial court erred in finding that Sperry had kept Weaver away from R.S. "for a long time, without good reason."

The trial court's finding that Sperry kept Weaver away from R.S. "for a long time, without good reason," is not supported by substantial evidence. Br. of App. at 29-32. Citing *In re Parentage of E.S.S.*, No. 69446-4-I (Wn. Ct. App. March 10, 2014) (unpublished), Sperry argued that withholding for less than one month does not satisfy the "protracted period" required by the statute for a finding under RCW 26.09.191(3)(f). Br. of App. at 30.

The same opinion also held that so long as there was a good reason for withholding, it makes no difference if there were also bad reasons for the withholding. Br. of App. at 30. Sperry had good reason for the withholding because the parties' original intent in the agreed parenting plan was to alternate every other month until R.S. started school, and Weaver had already missed her month. Br. of App. at 31-32.

Weaver's response does not address Sperry's arguments. She apparently does not object to Sperry's description of the parties' original understanding of the original parenting plan.

Indeed, she cannot, because until her attorney pointed out the flaw in the language of the original plan and convinced her to seek a three-month summer, Weaver had always agreed that visitation would be every other month until R.S. started school. *See, e.g.*, CP 308 (in January, 2016, after entry of the original parenting plan, Weaver stated that visitation was every other month until R.S. started school); Ex. 16 (Weaver states for the first time on July 23 that she gets a three-month summer).

Under the original understanding—that visitation would be every other month until R.S. started school—Sperry was under no obligation to exchange R.S. at the end of July, after Weaver had already missed her entire, designated month. Even though the trial court ultimately found that the original parenting plan gave Weaver a three-month summer, the parties' original understanding of the plan gave Sperry good cause to keep R.S. for his month of August until the trial court ordered otherwise.

The trial court erred in interpreting the original parenting plan. The parties' original intent was every other month visitation. Under a correct interpretation, Sperry did not withhold R.S. at all. But even under the trial court's interpretation, Sperry had good cause for the withholding because the parties disputed the meaning of the plan and he was following the parties' original intent. The withholding was also

not for a “protracted period,” being only for a few weeks from July 27 (the customary exchange date) until the trial court’s ruling in mid-August.

The trial court’s withholding finding was not supported by substantial evidence. This Court should reverse the finding and all limitations or residential provisions based on it.

2.2.3 The trial court erred in finding Sperry is less likely to encourage a relationship between the mother and child.

Sperry’s brief pointed out that the only apparent rationale for the trial court’s finding that Sperry is less likely to encourage a relationship between mother and child was the trial court’s belief that Sperry had withheld R.S. without good reason. Br. of App. at 33. As noted above, Sperry’s actions reflected only his attempt to follow the original parenting plan, not any attempt to harm Weaver’s relationship with R.S. Br. of App. at 33. All of the other evidence points to Sperry being more likely than Weaver to encourage R.S.’s relationship with the other parent. Br. of App. at 33-34.

Weaver’s response fails to point to any testimony to support the trial court’s finding that Weaver would be more likely than Sperry to encourage R.S.’s relationship with the other parent. The only testimony on Weaver’s side was that she encouraged R.S. to be attentive to Sperry during Skype calls.

RP 178. But Weaver admitted in the same breath that Sperry gave similar attention and respect to Weaver's Skype visits with R.S. RP 178 ("And that's the same respect that I got when I was away from Rylee as well.").

The trial court's finding was not supported by substantial evidence. This Court should reverse the finding and the parenting plan that relies on it.

2.2.4 The trial court erred in finding that Weaver had a stronger relationship with R.S. and greater potential for performance of parenting functions.

The trial court's finding that Weaver had a stronger relationship with R.S. and greater potential for performance of parenting functions was based on the trial court's faulty memory of the testimony at trial. Br. of App. at 35-36. Contrary to the trial court's comments, Weaver never testified about her relationship with R.S. or her performance of parenting functions Br. of App. at 36. Sperry testified to his significant relationship and performance of parenting functions. Br. of App. at 35-36. There was not substantial evidence to support the trial court's finding.

Weaver's response does not point to any testimony regarding Weaver's performance of parenting functions while the parents were together. The only testimony on Weaver's side was that she performed parenting functions while Sperry was

away from home for 2-3 months during the marriage, RP 177, and that she performed parenting functions while she had visitation with R.S. after the divorce, RP 172. During both times, she was assisted by her grandparents. RP 172, 177. During the marriage, Weaver relied heavily on Sperry to assist her with parenting functions. *E.g.*, RP 253. Although Weaver disagreed with this characterization, she did not present any testimony to the contrary. RP 177-78.

The trial court's finding was not supported by substantial evidence. This Court should reverse the finding and the parenting plan that relies on it.

2.3 This Court should reverse primary residential placement with Weaver.

Sperry argued that because the trial court's findings under RCW 26.09.187 regarding the parties' relationships with R.S., likelihood of supporting the other parent's relationship, and performance of parenting functions were not supported by substantial evidence, the residential provisions of the trial court's parenting plan were an abuse of discretion, being based on untenable grounds. Br. of App. at 36-37. Additionally, a schedule that effectively excluded Sperry from every special occasion in his young daughter's life was outside the range of

acceptable choices and therefore an abuse of discretion. Br. of App. at 37.

Weaver's response argues, without any apparent support, that the parties had agreed that R.S. should reside in California, and therefore Weaver was the only appropriate choice for primary residential placement. It is unclear where Weaver comes up with this alleged agreement. While it is true that prior to entry of the original parenting plan, Sperry was willing to relocate to California, by the time of the trial court's decision on the modification, circumstances had changed and Sperry no longer had any plan to relocate to California. The trial court's placement of R.S. primarily with Weaver cannot be justified based on any alleged agreement that R.S. should reside in California, because there was none.

As a backup, Weaver falls back on the trial court's "concerns" with Sperry's prior, reported sexual thoughts. As noted above, the trial court never made a finding of any potential harm to R.S. from sexual issues. The trial court did not make a finding that Sperry's sexual thoughts would have any impact on his relationship with R.S., his ability to perform parenting functions, or any other factor under RCW 26.09.187. Even if the trial court had made such findings, they would not be supported by substantial evidence, as demonstrated in Br. of App. at Part 4.3.1 and above at Part 2.2.1.

The trial court's parenting plan was an abuse of discretion. This Court should reverse and remand for a new plan with Sperry as primary residential parent.

2.4 This Court should deny Weaver's request for attorney's fees.

In requesting an award of attorney fees on appeal, a party must devote a section of its brief to the request. RAP 18.1. A bald request for fees, without argument, is insufficient. *Gardner v. First Heritage Bank*, 175 Wn. App. 650, 677, 303 P.3d 1065 (2013). Weaver's request for fees fails to explain why she should be entitled to an award. Her bald citation to RCW 26.09.140 is insufficient. This Court should deny her request for fees.

3. Conclusion

The trial court ordered restrictions on Sperry under RCW 26.09.191(3)(f) that were not reasonably calculated to prevent harm caused by potential future withholding of R.S. by Sperry. The trial court made many factual findings that were not supported by substantial evidence. On the basis of these unsupported findings and restrictions, the trial court crafted an unreasonably one-sided parenting plan that placed R.S. with Weaver and left Sperry with almost no visitation at all. All of these decisions abused the trial court's discretion.

This Court should reverse all of the RCW 26.09.191(3) restrictions listed in the parenting plan at CP 70 because they

are not reasonably calculated to prevent harm to R.S. under RCW 26.09.191(3)(f), the only reason for restrictions identified by the trial court.

This Court should reverse all of the findings identified in Part 4.3, above, none of which were supported by substantial evidence. Sperry's past sexual thoughts do not present a risk of harm to R.S.; all of the restrictions based on sexual issues must be reversed. Sperry did not withhold R.S. from weaver "for a protracted period" or "without good cause" under RCW 26.09.191(3)(f); all of the RCW 26.09.191(3) restrictions must be reversed. Weaver is not more likely than Sperry to encourage a relationship between R.S. and the other parent, does not have a stronger relationship with R.S., and is not stronger in performing parenting functions; the residential provisions of the parenting plan must be reversed.

This Court should reverse all of the RCW 26.09.191(3) restrictions imposed on Sperry; reverse all of the trial court's unsupported findings of fact; reverse the residential provisions of the parenting plan; and remand for a new plan with Sperry as primary residential parent and without any limitations on Sperry's time with R.S.

Respectfully submitted this 25th day of June, 2018.

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Certificate of Service

I certify, under penalty of perjury under the laws of the State of Washington, that on June 25, 2018, I caused the foregoing document to be filed with the Court and served on Counsel listed below by way of the Washington State Appellate Courts' Portal.

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DATED this 25th day of June, 2018.

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Appellate Court Case Title: In re the Marriage of Daniel Sperry, Appellant v Liberty Sperry, Respondent
Superior Court Case Number: 15-3-00079-4

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