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CASE NO.: 94631-1

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SUPREME COURT  
STATE OF WASHINGTON  
9/15/2017 8:00 am  
BY SUSAN L. CARLSON  
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IN THE  
FIRST DISTRICT COURT OF APPEALS  
FOR THE CIRCUIT

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CHRIS J. RAYMOND

Appellant,

v.

LISA S. SMITH

Respondent

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ON APPEAL FROM THE SUPERIOR COURT  
FOR PIERCE COUNTY

---

BRIEF OF APPELLANT

---

14 September 2017

Chris J. Raymond

2095 Memorial Dr.

South Hadley, MA. 01075

Telephone: (413)244-1213

Email: asonious@yahoo.com

**ORIGINAL**

filed via  
**PORTAL**

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## ASSIGNMENTS OF ERROR

1. The trial court committed reversible error by granting Appellee sole custody of the parties' minor son, and by denying Appellant any form of contact with their son.
2. The trial court lacked personal jurisdiction over Appellant, and thus the trial court committed reversible error by entering a final judgment adversely affecting Appellant's parental rights.
3. The trial court committed reversible error by failing to insure that Appellant received proper notice of scheduled hearings, thus depriving Appellant of his procedural due process rights.

**ISSUES PERTAINING TO ASSIGNMENTS OF  
ERROR**

**Assignment of Error 1:** Does the trial court have the authority to deny a parent access to their child without any evidence of adverse behavior to/against said child or to deny the parent an equal forum to be heard in the form of a trial or hearing to disprove any form of wrongdoing the parent may be incorrectly accused of in regards to the child?

**Assignment of Error 2:** Does the trial court have the authority to place any form of sanctions against a party if it lacks Personal Jurisdiction over said party that would deny the party its basic civil rights?

**Assignment of Error 3:** Does an attorney have the right to deny an adverse party proper service of process and notification of any trial/ hearing in accordance with local and federal laws?

## STATEMENT OF THE CASE

### PROCEEDINGS AND ACTIONS IN FOREIGN STATES

This case has been ongoing since July of 2011. It began in the State of Massachusetts in Hampshire County District Court, Docket Number HS11D0274DR. The docket for this case is rather large; it consists of 5 files that are each approximately 3 1/2 inches thick due to the extreme conflict in this case. Most of these files are due to Ms. Smith violating multiple court orders. Ms. Smith has been found guilty for 18 counts of Contempt of Court for willfully and maliciously withholding court ordered visitation between Adan Raymond and his father, Chris Raymond.

On July 24, 2013, Mr. Raymond agreed to permit Ms. Smith to move with Adan Raymond as long as she complied with the Judgement for Divorce NISI dated 19 September 2012 and the Agreement for Modification dated 24 July 2013. Ms. Smith only partially complied at times with both rulings until she moved to the State of Kansas in May of 2014.

When Ms. Smith moved to Leavenworth, Kansas with Adan Raymond and her current husband, Kyle Smith, she completely refused to honor said Agreement for Modification in regards to physical visitation. She then proceeded to file for a Modification of

Custody in the Leavenworth, Kansas District Court under case no:  
2014 DM 825.

In her motion to the Kansas Court Ms. Smith requested that all contact be cut off between Adan Raymond and his father, Chris Raymond. The court ordered that physical visitation be temporarily be suspended and that SKYPE visitation was to continue pending recommendations by GAL Suzanne Dircks. Ms. Smith then proceeded to move from the State of Kansas (without notice) before all litigation was completed.

GAL Suzanne Dircks stated in her report that she was unable to properly evaluate Adan Raymond and went off of what Dr. David Callies stated in his report to her (Dr. David Callies had seen Adan only one time and Dr. Callies refused to speak with or interact in any way with Mr. Raymond). Ms. Dircks stated that she did not know who was telling the truth.

During the time Ms. Smith spent in Kansas, Ms. Smith and her husband Kyle would interfere with the SKYPE visitation. Kyle Smith was the main offender in this matter. Mr. Smith would sit behind the computer during the visitation and not allow Adan to speak with his father unless he received permission from him. You

could see the duress that this caused Adan in his face and is very abusive in nature. At one point during this time period Adan started calling his father "the Other Guy" after which you could hear Mr. Smith laughing in the background. This is both abusive and inappropriate behavior for a child to be taught.

On 11 February 2015 at 6:15 pm (EST) Kyle Smith violently pushed Adan Raymond to the ground in front of the camera during a SKYPE visit. This violent act was witnessed by Mr. Raymond and Hillaree Haberle (Mr. Raymond would always have a witness present during interactions due to multiple false allegations made by Ms. Smith). Mr. Raymond stated "Get your hands off of my son!" After that Mr. Smith left the room. Lisa and Kyle Smith would interfere in many different ways. It got so bad that Adan would not speak due to the fact that Mr. and Ms. Smith turned the volume all the way down on the computer so he could not hear his father talking to him.

Another issue is that Ms. Smith and her husband would not let Adan have any items that came from Mr. Raymond. Ms. Smith would also refuse any packages sent to Adan by his father for Christmas, Birthdays, etc. (Mr. Raymond has all of the presents and packages to this day). One particularly disturbing event was

Ms. Smith admitting that she threw away on three separate occasions, small booklets of pictures (of his brother, father, dogs, etc.) that Adan had picked out himself so he could look at them when he missed us. Ms. Smith admitted to this in interrogatories and under oath in a Kansas Court in May of 2015 (case no: 2014 DM 825).

#### PROCEEDINGS IN WASHINGTON STATE

On 22 March 2016, Ms. Smith filed for modification of Custody in Pierce County Superior Court, Washington State under case no: 15-3-03045-0. Mr. Raymond was never served any form of Case Schedule in regards to this. Atty. Dan Liebman filed for a Restraining Order against Mr. Raymond on 5 April 2016 (CP, Document # 3). When this Order was finally denied Atty. Liebman then file for a Domestic Violence Order under a different case number(16-2-01579-0) on 18 May 2016 (CP, Document #21) which was also proven to be false (this was a reworded version of the Restraining Order). The Denial Order dated 15 June 2016 also stated that Washington State lacks Personal Jurisdiction over Mr. Raymond.

The Trial Court refused to hear at least 5 separate motions filed by Mr. Raymond in this case and multiple oral arguments. The Trial court also allowed Atty. Liebman to be non-compliant with proper civil procedure in regards to notification of trial/hearings, service of process, compliance with mandatory mediation and proper disclosure of expert witnesses before trial.

The Trial Court ignored the lack of Personal Jurisdiction over Mr. Raymond and his basic Civil Rights, to include Due Process of Law.

The Final Order/ Parenting Plan denies Mr. Raymond his rights to have a relationship with his son Adan completely due to the fact that Mr. Raymond does not have the financial means to travel to the State of Washington on a constant basis nor would Mr. Raymond be able to get the time required off at his place of work on Westover Air Reserve Base.

## **SUMMARY OF ARGUMENT**

THE TRIAL COURT ERRED IN ENTERING THEIR  
JUDGEMENT AND ORDER DATED 26 MAY 2017.

### **ARGUMENT**

The Trial Court Erred in their entry of Judgement and Order EST Residential SCH/Parenting Plan/Child Support/ dated 26 May 2017 (CP, Document #20). In this document under section 3a., it states that both parties do NOT have any of the following issues in regards to Adan Raymond: Abandonment, neglect, child abuse, domestic violence, assault or sex offense. This in itself should sustain Mr. Raymond's rights in regards to parent-child relationship afforded him by the 1<sup>st</sup>, 5<sup>th</sup>, 9<sup>th</sup> and 14<sup>th</sup> Amendments as shown in Doe v. Irwin, 441 F Supp 1247; U. S. D. C. of Michigan, (1985). In section 3b of the same document states that Mr. Raymond has a "lack of emotional ties" with Adan Raymond which has been proven to be false. Adan himself states in the GAL report (CP, Document #13) that he wishes to visit with his brother and father, Chris Raymond alone and unsupervised. Adan also states that he is not afraid of Mr. Raymond. It would then not be in Adan's best interest to deny all contact between Adan and his father. The reason for no contact between Adan and his brother and

father is due to the proven fact that Lisa and Kyle Smith have denied all contact for years without just cause. The Courts have been slowly eroding Mr. Raymond's rights away which is also without just cause. Absolutely no factual evidence has been produced to support Ms. Smith's claims against Mr. Raymond. The next claim by the Trial Court is that Mr. Raymond is guilty of "Abusive use of Conflict" in a way that endangers or damages the psychological development of Adan Raymond. First, there is absolutely no factual evidence to support this claim and how is it possible for this to happen when all contact has been withheld from Mr. Raymond for approximately 3 years now. It is impossible for Mr. Raymond to do anything to affect Adan Raymond without any contact. The only danger would come from Ms. Smith and her husband. Another question is that how is possible to has no issues that were stated in 3a present then in 3b have accusations of similar issues stated in 3a. The accusations in 3b lack any form of definitive proof and lack credibility.

In section 4 of the final order dated 26 May 2017 (CP, Document#20) it states that Mr. Raymond is to have "No contact with the child, Adan J. Raymond until the father has completed all evaluations and/or treatment as set forth throughout this parenting plan." First, the State of Washington has absolutely no Jurisdiction

over Chris Raymond. Mr. Raymond does not have sufficient contact with this state to give rise to personal jurisdiction over his person, no act or threat has been alleged to have occurred in this state, Mr. Raymond does not reside in this state and other than for the purpose of submitting and arguing this Appeal, is not present in this state and no personal service has ever been enacted upon Mr. Raymond. The Fourteenth Amendment's Due Process Clause constrains a State's authority to bind a nonresident defendant to a judgment of its courts, *World-Wide Volkswagen Corp. v. Woodson*, 444 U. S. 286, 291, and requires that the nonresident have "certain minimum contacts" with the forum State, *International Shoe Co. v. Washington*, 326 U. S. 310, 316. The inquiry into the "minimum contacts" necessary to create specific jurisdiction focuses "on the relationship among the defendant, the forum, and the litigation." *Keeton v. Hustler Magazine, Inc.*, 465 U. S. 770, 775. *Corp. v. Rudzewicz*, 471 U. S. 462, 475, and must be analyzed with regard to the defendant's contacts with the forum itself, not with persons residing there, see, e.g., *International Shoe*, *supra*, at 319. The plaintiff cannot be the only link between the defendant and the forum. These same principles apply when intentional torts are involved. See *Calder v. Jones*, 465 U. S. 783, 788–789. Pp. 5–10.

Another issue is that no trial/hearing was ever held to establish any grounds for Involuntary Termination of Parental Rights. The Trial Court, in its ruling denies Mr. Raymond his Parental Rights without any factual evidence or proper Due Process of Law as defined by the following: **RCW 13.34.180 Order terminating parent and child relationship—Petition—Filing—Allegations** which states in part:

1. You have the right to a fact-finding hearing before a judge.
  
2. You have the right to have a lawyer represent you at the hearing. A lawyer can look at the files in your case, talk to the department of social and health services or the supervising agency and other agencies, tell you about the law, help you understand your rights, and help you at hearings. If you cannot afford a lawyer, the court will appoint one to represent you.
  
3. At the hearing, you have the right to speak on your own behalf, to introduce evidence, to examine witnesses, and to receive a decision based solely

on the evidence presented to the judge. You should be present at this hearing.

Further cases that define Parental rights are as follows:

“ Right of parents to the care, custody and to nurture their children is of such character that it cannot be denied without violating those fundamental principles of liberty and justice which lie at the base of all our civil and political institutions, AND SUCH RIGHT IS A FUNDAMENTAL RIGHT PROTECTED BY THIS AMENDMENT AND AMENDMENTS 5, 9, and 14.” DOE V. IRWIN, 441 f. SUPP. 1247, U.S. DISTRICT COURT OF MICHIGAN (1977). “THE LIBERTY INTEREST AND THE INTEGRITY OF THE FAMILY encompass an interest in RETAINING CUSTODY OF ONE'S CHILDREN and, thus A STATE MAY NOT INTERFERE WITH A PARENT'S CUSTODIAL RIGHT ABSENT DUE PROCESS PROTECTIONS.” Langton v. Maloney, 527 F.Supp. 538 (U.S. dist. Ct. Connecticut - 1981). "Even when blood relationships are strained, parents retain vital interest in preventing irretrievable destruction of their family life; if anything, persons faced with forced dissolution of their parental rights have more critical need for procedural protections than do those resisting state intervention

into on going family affairs." Santosky v. Kramer, 102 S.Ct. 1388, 455 U.S. 745 (1982) Parents have fundamental constitutionally protected interest in continuity of legal bond with their children.

Matter of Delaney, 617 P.2d 886, Oklahoma (1980)

Parent's interest in custody of her children is liberty interest which has received considerable constitutional protection; parent who is deprived of custody of his or her child, even though temporarily, suffers thereby grievous loss and such loss deserves extensive due process protection. In Interest of Cooper, 621 P.2d 437, 5 Kansas App. Div. 2d 584 (1980). "Father enjoys the right to associate with his children which is guaranteed by this amendment (1st) as incorporated in Amendment 14, or which is embodied in the concept of 'liberty' as that word is used in the due process clause of 14th Amendment and equal protection clause of 14th." Mabra v. Schmidt. 356 F.Supp. 620 (U.S. District Ct. Wisconsin 1973). The United States Supreme Court noted that a parent's right to "the companionship, care, custody and management of his or her children" is an interest "far more precious" than any property right. Mav v. Anderson. 345 U.S. 528, 533; 73 S.Ct. 840, 843 (1952) that the parent-child relationship is constitutionally protected liberty interest (see Declaration of Independence --- life, liberty and pursuit of happiness and 14th Amendment of U.S. Constitution --- No state can deprive any person of life. liberty or property without

due process of law nor deny any person the equal protection of the laws). *Kelson v. Springfield*, 767 F.2d. 651 (U.S. Ct. App. 9th Circuit 1985).” The parent-child relationship is a liberty interest protected by the Due Process Clause of the 14th Amendment.”

*Bell v. City of Milwaukee*, 746 F.2d 1205, 1242-45 (S.C. Ct. App 7th Circuit 1985). "No bond is more precious and none should be more zealously protected by the law as the bond between parent and child." *Carsen v. Elrod*, 411 F.Supp. 645, 649 (U.S. District Court Eastern Dist. Virginia 1976). "A parent's right to the preservation of his relationship with his child derives from the fact that the parent's achievement of a rich and rewarding life is likely to depend significantly on his ability to participate in the rearing of his children. A child's corresponding right to protection from interference in the relationship deprives form the psychic importance to him of being raised by a loving, responsible, reliable adult." (Emphasis added) *Franz v. United States*, 707 F.2d 582, 595-599 (U.S. Ct. App. D.C. Circuit 1983). A parent's right to the custody of his or her children is an element of "liberty" guaranteed by the Fifth Amendment and Fourteenth Amendment to the Constitution of the United States. *Matter of Gentry*, 369 N.W.2d. 889, Mich. Appellate Div. (1983) Legislative classifications which distributes benefits and burdens on the basis of gender carry the inherent risk of reinforcing stereotypes about the proper place of

women and their need for special protection; thus, even statutes purportedly designed to compensate for and ameliorate the effects of past discrimination against women must be carefully tailored. The state cannot be permitted to classify on the basis of sex. *Orr v. Orr*, 99 S.Ct. 1102, 440 U.S. 268 (1979). The United States Supreme Court held that the "old notion" that "generally it is the man's primary responsibility to provide a home and its essentials," can no longer justify a statute that discriminates on the basis of gender. "No longer is the female destined solely for the home and the rearing of the family, and only the male for the marketplace and the world of ideas." *Stanton v. Stanton*, 421 U.S. 7, 10; 95 S.Ct. 1373, 1376 (1975) Classifications by gender must serve important governmental objectives and must be substantially related to achievement of those objectives. *Craig v. Boren*, 97 S.Ct. 451;429 U.S. 190 (1976).

The Trial Court denies Mr. Raymond his right to make major decisions in regards to his son Adan Raymond under section 5b which states that the reasoning for this decision resides in section 3a of said order that states no issues exist. In section 13 of this order the Trial Court imposes sanctions against Mr. Raymond for which it has no right because of Lack of Personal Jurisdiction.

Ms. Smith is due to move soon due to the fact her husband Kyle Smith is active duty and will receive orders to another base soon.

This I believe makes the State of Washington an improper venue. Also in regards to this issue is that Mr. Raymond is unable to afford travel to the State of Washington on a consistent basis due to financial reasons and inability to procure time off from his job at Westover Air Reserve Base. Therefore Mr. Raymond would not be able to comply with the Trial Courts improper sanctions that requires him seek multiple therapists in the State of Washington (Mr. Raymond also lacks insurance coverage in said State) and the fact that Mr. Raymond has done no wrong in regards to the issues at hand.

Under section 15 of this order the Trial Court's "Findings of Fact" are vague, lack legal standing and no factual evidence has ever been produced to support such findings. To further this argument I'd like to cite a piece of the case "in the interest of Smith" that was decided by the Washington State Supreme Court. (quote)"Short of preventing harm to the child, the standard of "best interest of the child" is insufficient to serve as a compelling state interest overruling a parent's fundamental rights."(end quote). For the state to interject its own opinion on what might be the best custody decision for the child, even when parents disagree, would be an implication on the fundamental rights of parents. Further citing Smith...

“It is not within the province of the state to make significant decisions concerning the custody of children merely because it could make a “better” decision.”

as well as...

“For the state to delegate to the parents the authority to raise the child as the parents see fit, except when the state thinks another choice would be better, is to give the parents no authority at all.

“You may do whatever you choose, so long as it is what I would choose also” does not constitute a delegation of authority.”

The Trial Court failed to hear Motions presented to the court on six(6) separate occasions (CP, Document #'s 4, 7, 9, 10, 14 and17) which violates Mr. Raymond's right to be heard.

#### ACTIONS OF ATTY. DAN LIEBMAN

Atty. Liebman never complied with Local Civil Rule 4 in regards to service of a formal case schedule (section 1b). Mr. Raymond to this day has never received said case schedule. Atty. Liebman also did not notify Mr. Raymond of a hearing that was held on 7 April 2017 until 26 April 2017, 19 days after the hearing was held. No personal service was ever completed by Atty. Liebman, the few documents he sent to Mr. Raymond was done via regular mail. Mr. Raymond was not allowed to review any evidence presented to the

Trial Court nor was he ever notified that Atty. Liebman intended to present Dr. David Callies as an expert witness.

IN RE LISA S. SMITH

Ms. Smith has interfered with Mr. Raymond's Parental Rights since July of 2011. Ms. Smith has been found in Contempt of Court for withholding visitation many times (18 counts), openly threatened Mr. Raymond in posts on Facebook, sent libelous and malicious statements to Mr. Raymond's place of work, filed a false Restraining and Domestic Violence Order (CP, document #'s 3 and 21) in the State of Washington, denied Adan Raymond any items given to him from Mr. Raymond ( Ms. Smith admitted to throwing away on 3 separate occasions, booklets with pictures of his father, brother and dogs that he picked out himself.(this was done under oath during a trial in Kansas and in a set of interrogatories to the same court signed by her under penalty of perjury)) and denied Adan Raymond the ability to have a loving relationship with his father and brother.

IN RE DR. DAVID CALLIES

Dr. David Callies admitted under oath on 10 May 2017 (RP, Cross examine by Mr. Raymond) that he only went off of what was reported to him by Lisa S. Smith in regards to Adan Raymond,

has never witnessed any "Extreme Behavior" of Adan Raymond, that he was not qualified to evaluate Mr. Raymond and refused to work with Mr. Raymond to help Adan Raymond with any mental health issues. Dr. Callies also admitted that he was not a member of the APA for which he claims to be a member of on his website.

Dr. Callies also prescribed medication for Adan Raymond without proper evaluation of what is actually wrong which I believe to be a form of Chemical Restraint and a violation of Adan's civil rights.

## CONCLUSION

The interference of Ms. Smith in regards to the relationship between Chris Raymond and Adan Raymond is quite clear.

Mr. Raymond has been denied his right to have a relationship with his son, Adan, by both Ms. Smith and the Trial Court without evidence to the fact or proper Due Process of Law. The Trial Court of Washington State lacks Personal Jurisdiction over Mr. Raymond yet has attempted to impose sanctions against his person unlawfully.

Mr. Raymond prays the Supreme Court will reverse/dismiss the ruling of Pierce County Superior Court in regards to the Judgement and Order EST Residential SCH/Parenting Plan/Child Support dated 26 May 2017 (CP, Document#20) with extreme prejudice.

Mr. Raymond would also ask that sole physical/legal custody of Adan Raymond be awarded to him in the State of Massachusetts.

If this is not deemed appropriate Mr. Raymond requests that the Court Order 50/50 physical/legal custody with Ms. Smith to provide all transportation cost between the parties (as stated in the Agreement for Modification dated 24 July 2013). Mr. Raymond also requests that for the next 3 years he is to have Adan Raymond for every holiday then alternate every other year (as per Agreement for Modification dated 24 July 2013). For school purposes Adan will physically reside with Mr. Raymond in Massachusetts (Ms.

Smith moves constantly) and until Ms. Smith can provide a permanent home address receive visitation every year between 12 July- August 25.

Mr. Raymond requests that the Court place a no contact order in against Kyle Smith due to the abusive nature he has towards Adan (which was witnessed by Mr. Raymond and Hillaree Haberle during SKYPE visitation).

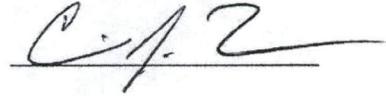
Mr. Raymond's asks that the court put the stipulation that if Ms. Smith violates any ruling in regards to visitation in the future, sole physical/legal custody goes to Mr. Raymond.

I also ask that the Court remove Adan Raymond from the care of Dr. David Callies for Adan's safety.

The final form of relief requested is financial. Through this arduous process it has cost Mr. Raymond a great deal of time off work and various legal fees as follows: filing of appeal \$290, Transcript \$120, Designation of clerks papers \$120, legal aid \$240 and loss of time at work (12 days) at the rate of \$34.77, 8 hours per day which equals \$3,337.92. The total of all items considered comes to \$4,107.92. Mr. Raymond request this be paid within 30 days.

14 September 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C. J. Raymond', written over a horizontal line.

Chris J. Raymond

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South Hadley, MA

01075

*Pro Se*

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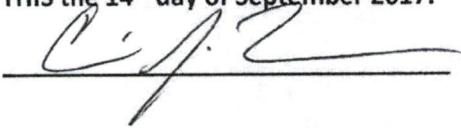
Phone: (413)244-1213

**CERTIFICATE OF SERVICE**

I, Chris J. Raymond, Appellant in the above referenced civil action, do hereby certify that I have this day caused to be delivered via Email a true and correct copy of the above and foregoing document to:

**Lisa S. Smith, Respondent, 1423 Grant Ave., DuPont, WA 98327**

**THIS the 14<sup>th</sup> day of September 2017.**

A handwritten signature in black ink, appearing to read "C.J. Raymond", is written over a solid horizontal line.

**CHRIS RAYMOND - FILING PRO SE**

**September 14, 2017 - 5:20 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 94631-1  
**Appellate Court Case Title:** Lisa Susan Smith v. Chris Jeffrey Raymond  
**Superior Court Case Number:** 15-3-03045-0

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