COA#520991-II

CASE NO.: 94631-1

RECEIVED
JAN 2 8 2018
Washington State
Supreme Court

IN THE
FIRST DISTRICT COURT OF APPEALS
FOR THE CIRCUIT

CHRIS J. RAYMOND

Appellant

v.

LISA S. SMITH

Respondent

ON APPEAL FROM THE SUPERIOR COURT
FOR PIERCE COUNTY

BRIEF OF RESPONDENT

20 January, 2018

Lisa S. Smith
1423 Grant Ave
DuPont, WA 98327

Telephone: 585-313-5405

For the Supreme Court of the State of Washington; I will keep my response brief by offering short answers to the three assignments of error brought forth by Mr. Raymond in his Appellant's Brief.

1. In regards to the state of Washington erroring in its decision to grant me sole custody of the minor child; this matter was not settled in Washington. The granting of sole legal and physical custody was awarded in the state of Massachusetts in December of 2012. Furthermore, the denial of physical visitation occurred in the state of Kansas in May of 2015.

2. In regards to the trial court of Washington lacking jurisdiction over Mr. Raymond; Mr. Raymond is referencing a separate matter regarding a restraining order. Because the incidents involved in the report did not occur in the state of Washington; the Judge stated she could not grant the order. The judge also explained to Mr. Raymond during numerous hearings that the UCCJEA gave her the right to accept other state's order and to make further rulings based upon the best interests of the minor child. Mr. Raymond was afforded the opportunity to appear by phone for all hearings but was informed that if he chose not to participate, that too was his right.

3. In regards to proper service; this case was opened in 2015 upon moving to the state of Washington with military orders. It took nearly 2 years to go to trial because Mr. Raymond filed so many motions. My lawyer sent documents via certified mail multiple times and was given notice by USPS that the documents were refused by Mr. Raymond. However; Mr. Raymond was still present for all hearings; appearing by telephone.

In conclusion; I do not believe that the Trial Court of Pierce County errored in its judgment. The first assignment of error brought forth by Mr. Raymond is not a Washington judgment. The second assignment of error has nothing to do with the judgment on appeal. The third assignment of error is not an error on the courts because Mr. Raymond chose to refuse service each time documents were sent to his residence.

The current Washington State order is an acceptance of an order made in the State of Kansas. The Washington Trial Courts reviewed the orders carried in under the UCCJEA and further considered the testimony of a Washington State GAL, the Child's current psychologist, and other written and oral testimony before adding additional stipulations to the already existing order. Should you require further information from me; I would be happy to assist at any capacity necessary.

Very Respectfully,

Lisa S. Smith

Lisa S. Smith

CERTIFICATE OF SERVICE

I, Lisa S. Smith, the respondent in the above referenced matter, do hereby certify that I have delivered a true copy of the above document via e-mail to Chris Raymond at asonious@yahoo.com. A copy was also mailed via first class mail:

Chris J. Raymond, appellant, 2095 Memorial Drive South Hadley, MA 01075

THIS the 20th day of January 2018

Lisa S. Smith

Lisa S. Smith