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NO. 53725-7-II

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

In re the Matter of

Sadie Engebretson

Appellant,

vs.

Sheldon Sanders

Respondent.

BRIEF OF APPELLANT

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I. INTRODUCTION

This case involves the wellbeing and healthy growth of Respondent and Petitioner's child. The Superior Court of Cowlitz County found no adequate cause to hold a hearing regarding a minor modification to an existing parenting plan. Adequate cause was again denied on Respondent's Motion for Order for Reconsideration Re Adequate Cause based on new and significant facts not able to be presented at the original motion. This is an appeal of those decisions.

Respondent's child, AS, is left in Petitioner's home without a parent for fourteen weeks out of the year and is compelled to cohabitate with a physically abusive elder child – the child of Petitioner's significant other -- and fears contact with a developmentally-delayed, allegedly sexually abusive uncle. Significantly, AS has enunciated in school that he will commit suicide with a shotgun and there are firearms in Petitioner's home. Respondent alleges that AS's life and mental health are in

danger because of Petitioner's developmentally-delayed brother, Petitioner's significant other's son, who lives with Petitioner, and Petitioner's refusal to maintain regular counseling appointments. AS is also at risk of stunted emotional growth and depressed wellbeing. The child's Mother appeals to this Court to reverse the ruling of the Superior Court of Cowlitz County and to remand with a finding of adequate cause so that she may proceed to a hearing on the best interest of AS.

Attorney's fees for this appeal is requested pursuant to RAP 18.1.

II. ASSIGNMENTS OF ERROR

A. Assignments of Error

1. The court erred in denying Respondent's motion for adequate cause decision dated May 7, 2019. (CP 40)
2. Respondent hereby assigns error to each of the findings, conclusions, statements, and orders contained in the order on adequate cause to change parenting/custody order regarding motion for adequate cause decision dated May 7, 2019 (CP 53), as follows:
    a. The court's finding that "[t]here is no adequate cause (valid reasons) to hold a full hearing or trial about the *Petition*. The *Petition* should be dismissed" (CP 53, 4). *Italics Not Added.*

b. The court's order that "The *Petition to Change a Parenting Plan, Residential Schedule, or Custody* Order is dismissed" (CP 53, 6). *Italics Not Added.*

3. The court erred in concluding on disputed facts that a prima facie showing of adequate cause was not established.
4. The court erred in denying Respondent's Motion for Order for Reconsideration re Adequate Cause decision dated May 29, 2019. (CP 60)
5. Respondent hereby assigns error to each of the findings, conclusions, statements, and orders contained in the order denying Respondent's Motion to Reconsider dated May 29, 2019 (CP 66).

a. The court's finding that "a 4 on, 4 off schedule creates less stability…" (CP 66, 1:25-2:1)

b. The court's implied statement of law that a finding of adequate cause is used to determine whether a change to a parenting plan should occur. (CP 66, pp 2: 3-5)

c. The court's finding that "there is nothing indicating that the residential schedule has anything to do with the current behavioral episodes." (CP 66, pp 1: 7-8)

d. The Courts finding that an Order "memorializing what the parties have been doing for the past year cannot be seen as a trigger for behavior" (CP 66, pp 2: 12-15).

6. Attorney's fees should be granted.

B. Issues Related to Assignment of Error

1. Given the evidence presented by Respondent at the May 7, 2019 adequate cause hearing, could a reasonable judge conclude that Respondent did not establish a prima facie showing of adequate cause to warrant a hearing regarding a minor modification to a permanent parenting plan?
2. Is the trial court's order manifestly unreasonable because the order did not contain grounds upon which the trial court came to its decision?
3. Did the trial court act improperly or contrary to law by including disputed facts in its consideration of Respondent's prima facie showing of adequate cause?
4. Has the trial court misapplied RCW 26.09.270 by confounding adequate cause for hearing the motion

with the ultimate decision of changing the parenting plan?

5. Having reviewed the record, the Guardian ad Litem report, and the parties' declarations as they relate to the motion to reconsider, could a reasonable judge conclude that learning of verbal manifestations of suicidal ideations one day before hearing on the motion for adequate cause does not indicate that a substantial change of circumstance has occurred since the adoption of the permanent parenting plan roughly 5 months prior warranting a hearing on a minor modification?
6. Whether the record supports a finding that "a 4 on/4 off schedule creates less stability…"?
7. Whether the record supports a finding that "there is **nothing** indicating that the residential schedule has anything to do with the current behavioral

episodes"? *Emphasis Added.*

8. Whether the record and law in the State of Washington is that minor modification requires absolute proof of a "trigger"?
9. Whether Respondent/Appellant plead a prima facie case for finding Adequate Cause to go Foward.
10. Whether Respondent/Appellant should be granted attorneys fees.

A. STATEMENT OF THE CASE

Petitioner/father Sheldon Sanders (hereinafter "Sanders"), and Respondent/Mother Sadie Engebretson (hereinafter "Engebretson"), began a relationship of which the child AS was born on March 22nd, 2012 (CP 19, pp 3:7-11). Soon after AS's birth Sanders entered the military and was ultimately out of AS life for the first five years (CP 19, pp 4:5-8). After his discharge from the military and return to the local area the parties worked out a week on, week off schedule with exchanges on

Wednesdays. That was later moved to Sundays (CP 19, pp 4:17-19).

An allegation arose regarding alleged sexual abuse of AS by Sander's developmentally delayed brother. The parties agreed that AS have no contact with that relative (CP 19, pp 4:19-25).

Sanders began a relationship with a woman who had a son three years older than AS (CP 19, pp 5:19-23). AS reported being physically abused by this child (CP 41, pp 2:19- 23). Engebretson had reported that AS had significant behavioral problems when returning from Sander's home. She expressed that AS needed to be in counseling. Erin Eastwood, the court appointed Guardian Ad Litem (Hereinafter "GAL") pointed out that AS had been diagnosed "with adjustment disorder and assigned to a counselor..." (CP 19, pp 19:3-6).

In that Sander's work schedule had changed the GAL recommended a schedule consistent with fathers new work

schedule of 4 days on/ 4 days off (See CP 19, pp 20:1-4 and CP 41, pp 3:14-22). Subsequent to the GAL recommendation the parties entered an agreed parenting plan on October 29th, 2018 (CP 31). That plan maintained the week on/ week off schduele the parties had developed prior to Sanders new employment. At that time Sanders was represented by counsel whereas Engebretson represented herself pro se.

On April 19th, 2019 Engebretson moved for a minor modification changing the week on/ week off schedule to four days on/ four days off to coincide with Sander's work schedule (CP 38). In her supporting declaration she pointed out that significant issues developed under the week on/ week off schedule (See CP 41and CP 51). Given Sanders schedule of 4 days on/ 4 days off of work, and the fact that he works "from 4 a.m to 8 or 9 p.m…" those days, meant AS was left in the care of someone other than a parent a minimum of 3 days and up to 4 days each visit (CP 41, pp 1:19-24). In addition, AS complained

about being left alone too often with Sanders girlfriends' son who is older than AS (CP 41, pp 2:24-29 and CP 51, pp 2:16-24). In addition, Engebretson was finding it difficult on the week on/ week off schedule getting AS to his recommended weekly counseling appointments which, under the week on/ week off schedule meant AS had to go a minimum of two weeks between every appointment (CP 41, pp2:5-23 and CP 51, pp 2:3-16). On a 4 on/ 4 off schedule Engebretson could have a counseling appointment for AS each week (CP 41, pp 3:1-13).

A hearing was held on May 7th, 2019, the day after labor day weekend. Sanders was scheduled to have Labor Day weekend and had AS from May 3rd to May 6th. Upon AS's return on May 6th (the day before the hearing on adequate cause) AS had a significant mental breakdown. Apparently, AS had spent the weekend in the presence of his alleged molester uncle. Teachers and counselors began reporting significant issues with AS (See CP 60, CP 61 and, CP 63). Engebretson brought a

motion to reconsider based upon this new evidence (CP 60). Per local court rule a motion to reconsider is forwarded to the judicial officer in charge, no hearing is scheduled, and the court decides the motion without argument.

Despite Engebretson's concerns and position that a modified parenting plan would be in the best interest of AS and ensure quality time to Sanders, and allow for regular counseling, a letter opinion denied the motion to reconsider and was entered on May 29th, 2019 (CP 66).

A. **SUMMARY OF ARGUMENT**

Where a party alleges prima facie facts that a minor modification could be beneficial in alleviating issues and is stated to be in the best interest of the child, a superior court of Washington should grant adequate cause to allow the case to proceed.

B. ARGUMENT

A. Standard of Review .

RCW § 26.09.260 provides that:

[a] court shall not modify a prior custody decree or a parenting plan unless it finds, upon the basis of facts that have arisen since the prior decree or plan or that were unknown to the court at the time of the prior decree or plan, that **a substantial change has occurred in the circumstances of the child** or the nonmoving party and **that the modification is in the best interest of the child** and is necessary to serve the best interests of the child. *Emphasis Added.*

RCW § 26.09.270 provides that:

A party seeking a temporary custody order or a temporary parenting plan or **modification of a** custody decree or **parenting plan** shall submit together with his or her motion, an affidavit setting forth facts supporting the requested order or modification and shall give notice, together with a copy of his or her affidavit, to other parties to the proceedings, who may file opposing affidavits. **The court shall deny the motion unless it finds that adequate cause for hearing the motion is established by the affidavits**, in which case it shall set a date for hearing on an order to show cause why the requested order or modification should not be granted. *Emphasis Added.*

RCW § 26.09.260(5) states that:

> (5) The court may order adjustments to the residential aspects of a parenting plan upon a showing of a substantial change in circumstances of either parent or of the child, and **without consideration of the factors set forth in subsection (2)** of this section, **if the proposed modification is only a minor modification in the residential schedule that does not change the residence the child is scheduled to reside in the majority of the time** and:
>
> (a) Does not exceed twenty-four full days in a calendar year; or
>
> (b) Is based on a change of residence of the parent with whom the child does not reside the majority of the time or an involuntary change in work schedule by a parent which makes the residential schedule in the parenting plan impractical to follow; or
>
> (c) Does not result in a schedule that exceeds ninety overnights per year in total, if the court finds that, at the time the petition for modification is filed, the decree of dissolution or parenting plan does not provide reasonable time with the parent with whom the child does not reside a majority of the time, and further, the court finds that it is in the best interests of the child to increase residential time with the parent in excess of the residential time period in (a) of this subsection. However, any motion under this subsection (5)(c) is subject to the factors established in subsection (2) of this section if the party bringing the petition has previously been granted a modification under this same subsection within twenty-four months of the current motion. Relief granted under

> this section shall not be the sole basis for adjusting or modifying child support. *Emphasis Added.*

The standard of review of an adequate cause decision is abuse of discretion. *In re Parentage of Jannot*, 149 Wn.2d 123, 65 P.3d 664 (2003). A court has abused its discretion if its decision is manifestly unreasonable or based upon untenable grounds or untenable reasons. *In re Marriage of Littlefield*, 133 Wn.2d 39, 940 P.2d 1362 (1997). A trial court's decision is manifestly unreasonable if it is outside the range of acceptable choices, given the facts and the applicable legal standard. *In re Marriage of Bowen*, 168 Wn.App. 581, 586-87, 279 P.3d 885, review denied, 176 Wn.2d 1009 (2012). A trial court's decision rests on untenable grounds if the factual findings are unsupported by the record; it is based on untenable reasons if it relies on an incorrect standard or the facts fail to meet the correct standard *Id.*

In *Bower vs. Reich* 89 Wn.App 9,964 P.2d 359 (1997) the court ruled at page 15 as follows:

> "Sections 1 and 2 establish a preference for stability in a child's living arrangements, absent specific circumstances relating to the best interests of the child. Section 4(b) of the statute, however, is an express exception, allowing the court the flexibility to make a "minor" modification to a child's residential schedule in some situations:
>
> (4) The court may order adjustments to a parenting plan upon a showing of a substantial change in circumstances of either parent or of the child, and without consideration of the factors set forth in subsection (2) of this section, if the proposed modification is only a:
>
> (b) Minor modification in the residential schedule that:
>
> (i) Does not change the residence the child is scheduled to reside in the majority of the time; and
>
> (ii) Does not exceed twenty four full days in a calendar year or five full days in a calendar month; or
>
> (iii) Is based upon a change of residence or an involuntary change in work schedule by a parent which makes the residential schedule in the parenting plan impractical to follow.

In *Bowers* Supra, the court went on to reverse the Order of the Superior Court and reinstate the commissioners Order on Adequate cause, and specifically stated at page 16:

> "We reject Reich's argument. The requirements listed in subsections (i), (ii) and (iii) explain what the Legislature considered to be minor modifications. The statute provides no other criteria by which to determine whether a proposed modification is minor. Although a move out of state and away from the non-residential parent is undoubtedly a major event in a young child's life, the statute contemplates that a "substantial change in circumstances of either parent or of the child" can, in the circumstances defined by subsection (4)(b), be addressed through a minor modification of the parenting plan. And the statute expressly provides that one of the circumstances permitting a minor modification to a parenting plan is a "change of residence ... which makes the residential schedule in the parenting plan impractical to follow."

In re Marriage of Flynn 94 Wn. App. 185, 972 P.2d 500 (1999) the court cited *Bower* and *In re Marriage of Littlefield* 133 Wash.2d 39, 940 P.2d 1362 (1997) "[b]ecause the affidavits supporting the petition contain facts showing a prima facie case of adequate grounds to modify on the basis of a minor modification if the facts are proven at an evidentiary hearing, we conclude the court erred. We reversed and remanded for an evidentiary hearing." At page 190 the court ruled as follows:

> "Statutory construction is a matter of law reviewed de novo *Marriage of Hansen* 81 Wash. App. 494,498, 914 P.2d 799 (1996). When the trial court's decision is decided on the affidavits of the parties, we are in the same position as the trial court and decide the question as a matter of law *In re Marriage of Roorda*, 25 Wash.App. 849, 853, 611 P.2d 794 (1980).

Specifically the court ruled at page 192 that "[a]ll that is necessary for Ms. Manis to show is a substantial change in her circumstances making the prior parenting plan impractical to follow."

Both *Bower* Supra and *Flynn* Supra, involved a relocation of one of the parents. Here, Engebretson is seeking a minor modification based upon significant alleged physical abuse as well as mental and emotional detriment of AS. Her position is that Sanders work schedule is significantly negatively impacting AS. Her solution is to modify the residential schedule without detracting any time from Sanders. Her solution would provide parental supervision when AS is with Sanders, not the case under the current parenting plan. That would alleviate

allegations of physical abuse by Sander's girlfriend's son. Her proposal provides residential time when Sanders is off work whereas the current plan has up to four days where Sanders is not with AS. Furthermore, it would allow Engebretson to get AS to counseling sessions every week. This has been recommended by AS's pediatricians, counselors, and school personnel. Those significant issues resolved by her proposed parenting plan should be weighed against the requested minor modification in light most favorable to Engebretson. Instead, the court made rulings not based on facts presented to the court and made findings not supported by the evidence.

In order for judicial consistency across the state, a standard should be announced for determining adequate cause in minor modification. Engebretson proposes that if viewed in light most favorable to the moving party, a reasonable person could argue there is a stated detriment to the child given the circumstances, the court should grant adequate cause for a hearing. In other

words, a prima facie case should be established, if viewed in light of the moving party, a reasonable person could argue that there is a stated change in circumstances warranting a minor modification.

B. <u>Recent Unreported Cases Pursuant to GR 14.1</u>

In re Marriage of Mekuria, 033114 WACA, 70590-3-I (2014) the court set forth the factors for a major modification as follows:

> "The trial court will allow a hearing on the motion only if the affidavit establishes adequate cause. **The primary purpose of the threshold adequate cause requirement is to prevent movants from harassing nonmovants by obtaining a useless hearing**. Adequate cause requires something more than prima facie allegations that, if proven, would permit a court to modify the parenting plan. At a minimum, adequate cause means evidence sufficient to support a finding on each fact that the moving party must prove to modify the parenting plan.
>
> Here, the trial court properly determined that adequate cause was lacking. Mekuria's affidavit alleged Menfesu's worsening eyesight as a substantial change in circumstances. But this medical condition was known to the trial court at the time it established the parenting plan. There was no evidence of any worsening of the condition. Thus, there was no change in circumstances. Further, the

> photographs Mekuria submitted regarding his daughter's alleged "injuries" showed nothing more than common scrapes that a child might acquire while playing. And the mother's care." *Emphasis Added.*

Here, there is no allegation that Engebretson Petition to modify was intended to harass Sanders. To the contrary, the facts alleged are supported by AS doctors, school personnel, and Engebretson that the parenting plan which requires AS to spend up to four days at his father's residence without his father present poses a significant detriment to AS. The solution of a minor modification not detracting one minute from Sanders time is an allegation showing more than prima facie evidence and adequate cause should have been granted. Her solution actually increases the time Sanders could be with AS.

In re Parentage of Cuhaciyan-Riggins 121817 WACA, 75353-3-I (2017) the court stated:

> "[a] court's decision is manifestly unreasonable or based on untenable grounds if it is outside the range of acceptable choices given the facts and the applicable legal standard, or if the factual findings are unsupported by the record. In re Marriage of Fiorito. 112 Wn.App. 657, 664,

> 50 P.3d 298 (2002). We will uphold the trial court's findings of fact if supported by substantial evidence. McDole. 122 Wn.2d at610. Substantial evidence is sufficient evidence to persuade the fact finder that a particular finding is true. In re Marriage of Drlik. 121 Wn.App. 269, 274-75, 87 P.3d 1192 (2004). We review the evidence and reasonable inferences therefrom in favor of the respondent. Zigler. 154 Wn.App. at 812."

C. <u>Factual Argument</u>

Here, the court made rulings not based on the facts presented in the motion for adequate cause. In it's decision entered May 7th, 2019 the court made no findings whatsoever. Under paragraph 5 of page 2 of that Order, Other Findings was left blank. In its Order on Reconsideration the Court made several findings not supported by fact. Without facts the court found that "a four on, 4 off, schedule creates less stability…" (CP 66, pp 1: 26- pp 2:1). The court then referenced the Guardian Ad Litem without acknowledging the specific recommendation that the parties go to a four on, four off schedule.

Next, the court indicated that letters from the counselors "do not give rise to a finding of adequate cause for a <u>change of</u>

the parenting plan" *Emphasis Not Added* (CP 66). Apparently the court was deciding the ultimate issue without the benefit of an updated GAL Report or any testimony from experts or lay witness. The court went on to state that "statements by the child are quite concerning…" (CP 66) and recommended that "the parties should continue to seek counseling for him…"(CP 66) without acknowledging numerous statements by Engebretson that Sanders was resistant to counseling and that her proposed parenting plan would allow for the counselor recommended weekly counseling sessions with AS which was a reason why adequate cause needed to be found so that Engebretson could pursue that very issue. Engebretson's proposed minor modification would resolve those issues for the benefit of AS.

Next, the courts statement that "…nothing indicating that the residential schedule has anything to do with the current behavioral episodes" (CP 66) is again a statement of the ultimate determination at trial. Again, had the matter proceeded to

adequate cause upon discovery a Petitioner is given the opportunity to prove their allegations. By denying the Petitioner a hearing based upon this statement, the court has made the ultimate decision without the benefit of trial or facts supporting it.

Next, the court indicates that "the child has been operating under the current system in excess of a year…" (CP 66) is not an accurate statement of facts presented to the court. The facts presented to the court were that Sander's work schedule had recently changed prior to the entry of an Agreed Order. The GAL recommended 4 on/4 off but Engebretson was unrepresented whereas Sanders was represented. An Agreed Order was entered without the benefit of a hearing. From the time of the Agreed Order to the time of Engebretson Petition for Modification and Motion for Adequate Cause was less than 6 months. There was no basis for the court's finding that "the simple entry of an Order memorializing what the parties have

been doing for the past year cannot be seen as a trigger for the behavior."(CP 66) Not only does this assume facts not in evidence, but it again ultimately decides the petition for modification when what was presented to the court was a motion for adequate cause for a finding to proceed.

Policy demands that a standard be set to determine a court's abuse of discretion. If viewed in a light most favorable to the moving party, a reasonable person could argue that there is a substantial change in circumstance and the request is arguably in the best interest of the child and not intended to harass the other parent, then if the court denies that motion, the court has abused its discretion.

V. ATTORNEYS FEE'S

Engebretson requests an award of her reasonable attorney fees for both the Superior Court litigation and for this Appeal. Engebretson is only marginally employed as a parāeducator. Sanders is full time employed and works significant over time.

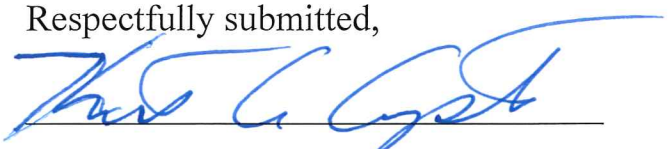
RCW 26.26B.060 provides that the court has authority to award reasonable fees. Without an award of fees, Engebretson has no access to justice. The fact that Engebretson could not afford an attorney whereas Sanders was able to afford an Attorney required her to seek legal assistance. It was the unrepresented Engebretson who agreed to the parenting plan in opposition to the GAL's recommendation when Sanders was represented.

VI. CONCLUSION

Sound policy concerns demand a uniform standard to be applied in adequate cause hearings for minor modifications to the residential aspects of parenting plans. Engebretson prays this Court will reverse both the trial court's Order denying Respondent's Motion for Adequate Cause Decision and the trial court's Order denying Respondent's Motion for Order for Reconsideration Re Adequate Cause. Engebretson prays that this Court will remand those Orders with instructions to the trial court. Engebretson requests an award of Attorney Fees.

Dated this 14 day of Nov, 2019.

Respectfully submitted,



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CERTIFICATE OF PERSONAL SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the 14th day of November, 2019, I caused to be served upon counsel listed below, in the manner indicated therein, a true and correct copy of the Brief of Appellant together with the transcript of hearing.

Addressed to:	Delivered via:
Carlee Bliss 715 Broadway St, Longview, WA 98632	Hand Delivered November 14th, 2019.

Dated this 14th day of November, 2019

Samuel Anagnostou

DAGGY & ANAGNOSTOU, P.S.

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