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**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

MATTHEW HINK, RESPONDENT

v.

MELODY RUDE, APPELLANT

Appeal from the Superior Court of Thurston County
Commissioner Nathan Kortokrax

No. 19-2-30629-34

BRIEF OF RESPONDENT

Lily K. Wilson, WSBA #55009
MORGAN HILL, PC
Attorney for Respondent

2102 Carriage Dr SW, Bldg C
Olympia, WA 98502
(360) 357-5700

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A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR

1. Was the evidence sufficient for a court to find that Appellant committed unlawful harassment within the meaning of RCW 10.14.020 when Appellant contacted Mr. Hink hundreds of times over several months for no legitimate or lawful purpose despite Mr. Hink's repeated requests that she stop, Appellant acknowledged that the contact was unwanted, and the contact caused Mr. Hink substantial emotional distress?
2. Did the trial court properly exercise its discretion by allowing Mr. Hink's petition to proceed when a hearing was scheduled 20 days after the petition was filed and any prejudice was sufficiently neutralized by granting Appellant's request for a four-week continuance?
3. Does this Court have jurisdiction to consider Appellant's assignment No. 3 when the claimed issue relates to a temporary order that was entered under a different cause number?

B. STATEMENT OF THE CASE

Appellant asks the Court to overturn the trial court's October 9, 2019 ruling granting Mr. Hink's Petition for an Anti-Harassment Protection Order. This Court should affirm the trial court's decision.

1. Procedure

Respondent, Mathew Hink, filed a Petition for an Anti-harassment Protection Order on August 22, 2019 and set a hearing for September 11, 2019. CP 1–6. Service was effected on Appellant, Melody Rude, on August 25, 2019. The parties appeared through counsel on September 11, 2019, and Appellant requested a continuance to October 9, 2019. CP 74. Commissioner Nathan Kortokrax presided over the October 9, 2019 hearing. RP 1. Mr. Hink presented testimony and was cross-examined by Appellant’s counsel. CP 93. Appellant declined to testify. RP 3, RP 50:6–8; CP 93. The court found that there was a basis, shown by a preponderance of the evidence, for the court to enter an order of protection under the anti-harassment statute. RP 58:18–21. The court also found Mr. Hink’s testimony to be credible. RP 58:25–59:1. The court entered a renewable order that is effective through October 9, 2020. RP 59:11–18; CP 90–92. Appellant filed a Motion for Reconsideration on October 23, 2019, which the court denied on that same date. CP 98; CP 106.

2. Facts

The parties were in a dating relationship and had lived together for approximately one year when Mr. Hink filed his Petition for an Anti-Harassment Order. CP 7. Mr. Hink previously filed a Petition for a Domestic Violence Protection Order, and the court entered an ex parte DVPO on June 12, 2019. RP 15:21–23; Ex. 4. Mr. Hink sought the DVPO

after Appellant assaulted him on June 10, 2019. RP 10:10–20. Mr. Hink was working at his computer in his home office when Appellant burst into the room yelling and began banging on his computer. CP 8. Appellant’s mental state had seriously declined over the previous three months. Mr. Hink testified that he had to leave the residence previously when Appellant had a similar outburst in March 2019. RP 13:13–14:2. Because of the past incidents, he knew on June 10, 2019 that he needed to remove himself from the situation before Appellant’s actions escalated. CP 8. He attempted to leave, and calmly stated, “Ok. I’m out of here. You’re crazy,” to which Appellant mockingly replied, “I’m crazy... I can do thiiiiiiiiis,” as she slammed Mr. Hink’s computer keyboard and other items. *Id.* She repeatedly shouted, “I can do thiiiiiiiiis, I can do this, this, this, this, this,” while slamming Mr. Hink’s things around. *Id.* Mr. Hink testified that he asked Appellant to stop and continued walking toward the door to leave. *Id.* Appellant lunged at him and began punching and hitting him with both fists, jumping on him, and choking him. RP 10:15–20, RP 11:4–17; CP 8. Mr. Hink had to free himself from Appellant’s chokehold three separate times as he attempted to leave the room. *Id.* Appellant continued yelling at Mr. Hink and stated, “You don’t know how to treat the s**t that is around you. You treat s**t that’s around you like it’s dead. But you know what? Now it’s your turn. Now it’s your turn motherf**ker! You’re the dead one.” CP 8–9. Mr. Hink was terrified and said, “You’re

crazy, Melody.” With what Mr. Hink described as “the eeriest look in her eyes,” Appellant responded, “No, you’re f**king crazy.” CP 9.

Mr. Hink hurried outside, hoping that Appellant would be less likely to attack him if neighbors were watching. RP 12:5–10; CP 9. Appellant followed him, paying no heed to Mr. Hink’s requests to stay away and not touch him. CP 9. Appellant stated, “I’m f**king stronger than you. You’re never gonna f**king win against me, and you know why that is? Because I knooow about you. You’re a f**king loser mother**ker.” *Id.* Mr. Hink stated that he felt he could not return to the house and continued walking. RP 12:11–13:1; CP 9. He purchased some basic necessities in the Capitol Mall area and checked in to a hotel until the ex parte DVPO was in place. *Id.* He testified that he was terrified because Appellant was volatile and violent, and that there absolutely no way he would ever be alone with her again. RP 13:7–12. Mr. Hink testified that Appellant attempted to contact him on June 16, 2019 by having her minor child deliver a note to him. RP 15:4–20. The ex parte DVPO was in place at that time. *Id.* Mr. Hink declined to accept the note. *Id.*

Mr. Hink explained that he did not pursue a final DVPO because he did not want to emotionally hurt Appellant by doing so. RP 16:12–15. He also believed that Appellant could remove her remaining property from his home without further conflict and was hopeful that there would be no further issues because Appellant was no longer living in Olympia. RP 16:2–4; CP 7. Unfortunately, that was not the case.

Appellant removed some of her property from Mr. Hink's residence the day after the ex parte DVPO expired. CP 9. Mr. Hink believed there was a mutual understanding that Appellant needed to remove her remaining property within a reasonable time. RP 18:22–19:7; CP 9. However, instead of removing her property, Appellant began inundating Mr. Hink with harassing text messages. CP 9. Mr. Hink repeatedly tried to arrange a time for Appellant to pick up her things, but she refused to cooperate. RP 19:19–20:4; CP 9. Mr. Hink repeatedly informed Appellant that he did not want to talk to her and asked her to not contact him unless it involved the logistics of moving her items out of his home. *Id.* Mr. Hink's counsel notified Appellant's counsel in a letter dated July 24, 2019 that Appellant needed to stop harassing Mr. Hink and that if Appellant did not remove her property by August 4, 2019, then Mr. Hink would place the property in a storage facility and cover the costs for the first month. RP 18:12–13; CP 9–10. Appellant was not deterred and indicated that she planned to build a shed at her parents' house and move her things some time in November 2019. CP 10. Mr. Hink stated clearly that that would not work for him. CP 10.

On August 2, 2019, Appellant insisted that she needed to go to Mr. Hink's house for a 48-hour period in order to get her things and would not agree to any other arrangement. RP 20:17–21:6, RP 32:22–33:10; CP 10, CP 15. She also sent Mr. Hink a cryptic text message stating, "Expect visitors tonight all night and early tomorrow." CP 10, CP 16. She would

not explain what she meant by that or who the “visitors” might be. CP 10. She then informed Mr. Hink that she would come to his house with law enforcement. CP 10, CP 17. Mr. Hink was anxious and could not sleep that night because he was concerned that Appellant would show up at his house. CP 10.

The morning of Saturday, August 3, 2019, Appellant’s family members loaded most of Appellant’s property into a 26-foot U-Haul truck. CP 10. Later that afternoon, Appellant texted Mr. Hink and accused him of stealing her jewelry (which he had not). RP 22:13–23:4; CP 10, CP 24. Given that the truck was the largest U-Haul available to rent and could hold four or more bedrooms worth of items, Mr. Hink believed there was no way Appellant could have even gone through the contents of the truck in such a short amount of time. RP 22:13–23:4; CP 10. In the days that followed, Appellant besieged Mr. Hink with nonstop text messages in which she accused him of damaging or withholding her property. CP 10. On Tuesday, August 6, 2019, Appellant text messaged Mr. Hink at 3:46 a.m., 5:34 a.m., and 6:58 a.m. CP 10. Mr. Hink testified that among those text messages was a four-page message in which Appellant stated, “I can see why this annoys you, but please know that my annoying texts are sincere messages of someone who thinks you deserve to find the Matt and the Matt happiness that is core to your self-worth.” RP 35:9–13; CP 10, CP 35. Appellant complained that her fuchsia plant, power strip, extension cord, two towels, and a cat toy were still at Mr. Hink’s house

and demanded that he return them to her. CP 10–11. Mr. Hink delivered the items to Appellant’s parents’ residence on August 9, 2019. CP 11. Mr. Hink hoped that would be the last of the harassment. CP 11.

Appellant’s harassment further escalated beginning on August 9, 2019. CP 11. That day, Appellant text messaged Mr. Hink and informed him that she planned to show up at his house “spontaneously someday soon” because her “only option [was] to appear unexpectedly,” and launched into a six-page tirade about how she planned to sue him. CP 11, CP 39–50. Mr. Hink feared Appellant would come to his house without notice, and he was constantly on edge as a result. CP 11. Appellant relentlessly accused Mr. Hink of dumping her property in the street and destroying it. CP 11. She continued to send Mr. Hink extremely bizarre and unsettling text messages that suggested to him that she had a completely distorted sense of reality. CP 11. Appellant informed Mr. Hink that she was attempting to find somewhere to live near his house, stating, “we can be neighbors,” and said she was working on a “don’t date this man” blog for the sole purpose of defaming him. CP 11, CP 58. Mr. Hink received a disturbing text message in which Appellant stated, “I know what you did, I know how you did it, and I know how long you planned it. Very intricate. You covered almost all of your bases. But I know what you. All of it. And you didn’t do it alone. It’s been a team effort since almost the beginning.” CP 11, CP 68. Mr. Hink had no idea what Appellant was referring to and believed she was either delusional or trying to

manufacture what she believed would be evidence against him for some act. CP 11–12.

Mr. Hink repeatedly responded to Appellant's messages by asking her to not contact him, but Appellant refused to stop. CP 11. Appellant's repeated and unwanted contact at all hours of the day and night began to take a serious toll on Mr. Hink and affected his sleep and work. CP 11. Mr. Hink testified that Appellant continued to contact Mr. Hink even after she was served with the Petition on August 25, 2019. RP 25:23; Ex. 2. He also explained that he had blocked Appellant's phone number in the past, but that Appellant had contacted him from other phone numbers or via email. RP 26:1–9.

C. SUMMARY OF ARGUMENT

This Court should affirm the trial court's ruling where: (1) There was sufficient evidence for the trial court to find that Appellant committed unlawful harassment within the meaning of RCW 10.14.20; (2) Appellant raised her procedural challenge for the first time on appeal; and (3) Appellant is not entitled to review on issues arising out of a temporary domestic violence protection order previously and separately entered against Appellant.

D. ARGUMENT

1. EVIDENCE WAS SUFFICIENT FOR A COURT TO FIND THAT APPELLANT COMMITTED UNLAWFUL HARASSMENT WITHIN THE MEANING OF RCW 10.14.020 WHEN APPELLANT'S REPEATED AND UNWANTED CONTACT CAUSED MR. HINK SUBSTANTIAL EMOTIONAL DISTRESS.

Appellant alleges that the trial court had no legal basis to enter an anti-harassment protection order because the court remarked during its oral ruling that, based on the evidence, there would be a basis for the court to enter a domestic violence protection order. It is well-established in the case law that a trial court's oral decision has no final or binding effect, unless formally incorporated into the findings, conclusions, and judgment. *Ferree v. Doric Co.*, 62 Wn.2d 561, 567, 383 P.2d 900 (1963). The Washington Supreme Court specifically stated in *Rutter v. Rutter*, 59 Wn.2d 781, 784, 370 P.2d 862 (1962), that assignments of error directed to statements contained in a trial court's oral decision do not constitute proper assignments of error. Moreover, such statements, when at variance with the findings, cannot be used to impeach the findings or judgment. *Rutter*, 59 Wn.2d at 784 (1962). Therefore, the issue before the court, with respect to Appellant's assignment No. 1, is whether the findings of fact support the trial court's conclusions of law.

The appellate court reviews the trial court's decision to determine whether the findings are supported by substantial evidence and whether those findings support the conclusions of law. *Dorsey v. King County*, 51

Wn. App. 664, 668–69, 754 P.2d 1255 (1988). Substantial evidence is the quantum of evidence sufficient to persuade a rational fair-minded person the premise is true. *Wenatchee Sportsmen Ass'n v. Chelan County*, 141 Wn.2d 169, 176, 4 P.3d 123 (2000). In determining the sufficiency of evidence, an appellate court need only consider evidence favorable to the prevailing party. *Bland v. Mentor*, 63 Wn.2d 150, 155, 385 P.2d 727 (1963). In evaluating the persuasiveness of the evidence and the credibility of witnesses, the reviewing court defers to the trier of fact. *Burnside v. Simpson Paper Co.*, 123 Wn.2d 93, 108, 864 P.2d 937 (1994).

RCW 10.14.020(2) defines unlawful harassment as (1) a knowing and willful (2) course of conduct (3) directed at a specific person (4) which seriously alarms, annoys, harasses, or is detrimental to a person and (5) serves no legitimate or lawful purpose. “Course of conduct” means a pattern of conduct composed of a series of acts over a period of time, however short, evidencing a continuity of purpose. “Course of conduct” includes, in addition to any other form of communication, contact, or conduct, the sending of an electronic communication, but does not include constitutionally protected free speech. RCW 10.14.020(1). Conduct is tested both subjectively and objectively in that it must be “such as would cause a reasonable person to suffer substantial emotional distress, and shall actually cause substantial emotional distress to the petitioner.” RCW 10.14.020(2). If the court finds by a preponderance of

the evidence that unlawful harassment exists, then a civil antiharassment protection order shall issue prohibiting such unlawful harassment. RCW 10.14.080(3).

The court, in granting a civil antiharassment protection order, has broad discretion to grant such relief as the court deems proper, including an order restraining the respondent from making any attempts to contact the petitioner or keep the petitioner under surveillance and requiring the respondent to stay a stated distance from the petitioner's residence and workplace. RCW 10.14.080(6)(a)–(c). Where the trial court's findings of fact provide a proper basis for entry of an anti-harassment order and substantial evidence supports the findings, the order will be upheld on appeal. *State v. Noah*, 103 Wn. App. 29, 39, 9 P.3d 858 (2000).

Appellant filed a sworn declaration but did not afford the court the opportunity to judge her credibility because she chose to not testify at the hearing. RP 55:17–56:10. Therefore, the court relied on Mr. Hink's uncontroverted testimony that Appellant assaulted him, which had led to his filing of a domestic violence protection order petition in June 2019. RP 56:15–17. The court stated, "I don't know why this matter is being filed under unlawful harassment as opposed to DVPO, because this Court would be able to find, based off of that evidence, that there would be a basis for domestic violence protection order, but that's not what's being asked for today. The Court is looking at definitions under 10.14." RP 56:17–23.

Whether Mr. Hink could have prevailed on a petition for a DVPO does not defeat his Petition for AHO where the trial court's finding that Appellant committed unlawful harassment as defined in RCW 10.14.020 is amply supported by the evidence. Mr. Hink testified that he received 500 to one thousand text messages from Appellant in mid-August 2019, that he unequivocally notified Appellant to stop contacting him a significant number of times, and that Appellant acknowledged her text messages were unwanted. RP 35:9–13, 41:10–12; CP 69; Ex. 2, 3. Appellant blatantly rejected Mr. Hink's requests to stop contacting him, stating, for example, "You will be hearing from me until the situation is satisfactorily resolved," and, "I am sorry that expressing myself is upsetting to you," and, "I realize that you find me repugnant," and, "Blah blah blah." CP 52, 59, 69; Ex. 2. The vast majority of the text messages were nonsensical and clearly lacked any legal purpose. Ex. 2. For instance, in response to Mr. Hink stating that he did not want Appellant to text him, Appellant stated, "Life is full of wants. I have wants too," and sent a picture of a small dog on a couch. Ex. 2. Collectively, this evidence of Appellant's repeated unwanted contacts established that she engaged in a course of conduct against Mr. Hink that seriously alarmed, annoyed, and harassed him, without lawful authority.

2. THE TRIAL COURT PROPERLY EXERCISED ITS DISCRETION BY ALLOWING MR. HINK'S PETITION TO PROCEED AND GRANTING APPELLANT'S REQUEST FOR A FOUR-WEEK CONTINUANCE.

The court should not review Appellant's assignment No. 2 because Appellant failed to raise it prior to appeal, and it does not constitute a manifest constitutional error. Appellant's claimed error concerns the failure of the trial court to enforce a procedural step in the exercise of its broad discretion in deciding whether to issue an anti-harassment order. Thus, Appellant must demonstrate that the trial court abused its discretion in reaching a decision that was manifestly unreasonable or based on untenable grounds.

- a. Appellant raises this procedural issue for the first time on appeal, and the claimed error does not fall within the purview of RAP 2.5(a).

The Court should not review this issue because Appellant did not raise it prior to this appeal. As a general matter, an argument neither pleaded nor argued to the trial court cannot be raised for the first time on appeal. *Washington Fed. Sav. v. Klein*, 177 Wn. App. 22, 311 P.3d 53 (2013), *review denied*, 179 Wn.2d 2019, 318 P.3d 280 (2019). However, a party may raise the following claimed errors for the first time in the appellate court: (1) lack of trial court jurisdiction, (2) failure to establish facts upon which relief can be granted, and (3) manifest error affecting a constitutional right. RAP 2.5(a).

Appellant seems to allege that the trial court's alleged error affects her individual rights under the United States Constitution. As a general rule, the Court of Appeals does not consider an issue raised for the first time on appeal except when such issue is a manifest error affecting a constitutional right. RAP 2.5(a)(3). To determine if an error is of constitutional magnitude, courts look to see whether, if correct, the claim would implicate a constitutional interest. *In re A.W.*, 182 Wn.2d 689, 344 P.3d 1186 (2015). To demonstrate that an error qualifies as manifest constitutional error, an appellant must identify a constitutional error and show how the alleged error actually affected the appellant's rights at trial. *Link v. Link*, 165 Wn. App. 268, 279, 268 P.3d 963 (2011); *State v. O'Hara*, 167 Wn.2d 91, 99, 217 P.3d 756 (2009). Even if there was constitutional error, this Court need not consider it for the first time on appeal unless it is manifest. The focus of the actual prejudice requirement is on whether the error is so obvious on the record that the error warrants appellate review. *Link*, 165 Wn. App. at 284 (2011); *O'Hara*, 167 Wn.2d at 99–100 (2009).

Appellant's claimed error does not concern her constitutional rights. RCW 10.14.010 establishes the procedure for obtaining an antiharassment protection order. A petitioner may obtain a temporary ex parte order on filing a petition. RCW 10.14.080(1). Generally, the court then sets a show cause hearing no later than 14 days from the issuance of a temporary order. RCW 10.14.080(2). The anti-harassment statute

does not, however, require a party to schedule a hearing within 14 days of filing a petition. RCW 10.14.070 states in relevant part, "Upon receipt of the petition alleging a prima facie case of harassment, other than a petition alleging a sex offense as defined in chapter 9A.44 RCW or a petition for a stalking protection order under chapter 7.92 RCW, *the court shall order a hearing which shall be held not later than fourteen days from the date of the order.*" (emphasis added). The statute states that the court—not the petitioner—shall order a hearing upon receipt of a petition alleging a prima facie case of harassment. Mr. Hink did not seek an ex parte order when he filed his Petition; therefore, the court did not order a hearing.

- b. Appellant cannot show that the trial court's decision granting Appellant's request for continuance was manifestly unreasonable or based on untenable grounds.

Even if Mr. Hink did incorrectly schedule the hearing for September 11, 2019, Appellant, appearing through counsel, did not object to timeliness or move to dismiss the petition and instead requested a four-week continuance, which the court granted. Therefore, the issue is whether the trial court's decision to grant Appellant's request for a continuance in conjunction with the procedural requirements of RCW 10.14.070 was manifestly unreasonable or based on untenable grounds.

Whether a motion for continuance should be granted or denied is a matter of discretion with the trial court, reviewable on appeal for

manifest abuse of discretion. In exercising its discretion, a court may properly consider the necessity of reasonably prompt disposition of the litigation; the needs of the moving party; the possible prejudice to the adverse party; the prior history of the litigation, including prior continuances granted the moving party; any conditions imposed in the continuances previously granted; and any other matters that have a material bearing upon the exercise of the discretion vested in the court. A court abuses its discretion when its decision is based upon a ground, or to an extent, clearly untenable or manifestly unreasonable. *Trummel v. Mitchell*, 156 Wn.2d 653, 670–71, 131 P.2d 653 (2006).

Appellant cannot show that she was prejudiced by the claimed error. Appellant asserts that the trial court's alleged error prejudiced her because it diminished her ability to defend against Mr. Hink's allegations. She cites to RCW 10.14.010 and wrongly interprets it to mean that the legislature intended for chapter 10.14 to provide both victims and perpetrators "with a speedy and inexpensive method of obtaining civil antiharassment protection orders preventing all further unwanted contact between the victim and the perpetrator." Brief of Appellant at 12. Appellant reasons that once a petition is filed, "it should not be left, indefinitely, while the respondent is completely unaware of the petition." *Id.* Regardless of whether that argument has merit, it is inapplicable here because Appellant was served with the Petition on August 25, 2019—three days after Mr. Hink filed it. If Appellant was somehow prejudiced by

the hearing having been scheduled more than 14 days after Mr. Hink filed the Petition, then any prejudice was effectively neutralized by the court granting Appellant's request for a four-week continuance to prepare on September 11, 2019. Appellant had the benefit of counsel during that time as well.

3. THIS COURT IS WITHOUT JURISDICTION TO CONSIDER APPELLANT'S CLAIMED ERROR ARISING UNDER THURSTON COUNTY SUPERIOR COURT CAUSE NO. 19-2-30420-34.

Appellant appeals the trial court's decision under Thurston County Superior Court Cause No. 19-2-30420-34. Appellant seems to allege that the trial court's alleged error affects her rights under the Second Amendment of the United States Constitution. The constitutional error alleged by Appellant is the trial court's failure to state with sufficient specificity in the temporary ex parte domestic violence protection order the number, types, and locations of any firearms believed to be in Appellant's ownership, possession, custody, access, or control.

Appellant is not entitled to review on issues arising out of the temporary ex parte DVPO previously entered against Appellant under a different cause number. RAP 2.2 sets forth the types of superior court decisions from which a party may appeal. Temporary orders are not among them. Moreover, the time allowed to file a notice of appeal under cause number 19-2-30420-34 has long since passed. RAP 5.2(a) states in relevant part that a notice of appeal must be filed in the trial court within

the longer of either 30 days after entry of the decision of the trial court that the party filing the notice wanted review or the time provided in section (e) (which is not applicable here). The Temporary Domestic Violence Protection Order was entered on June 12, 2019 and expired on June 26, 2019. The time allowed to file a notice of appeal passed approximately one year ago.

Finally, this issue is moot because the trial court dismissed the domestic violence matter in June 2019. An appeal is moot if the appellate court no longer can provide effective relief. *Chimacum Sch. Dist. v. R.L.P.*, 10 Wn. App. 2d 156, 163, 448 P.3d 94 (2019). The issue of whether the trial court violated Appellant's Second Amendment rights when it ordered Appellant to surrender weapons is moot because the temporary DVPO has been dismissed.

4. THE COURT SHOULD AWARD ATTORNEY FEES TO MR. HINK FOR HAVING TO RESPOND TO APPELLANT'S FRIVOLOUS APPEAL.

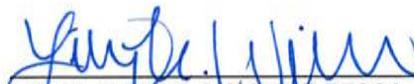
Mr. Hink requests attorney fees and costs because Appellant's appeal of the trial court's decision is frivolous. Under RAP 18.1(a), a party on appeal is entitled to attorney fees if a statute authorizes the award. RAP 18.9(a) authorizes this court to award compensatory damages when a party files a frivolous appeal. *West v. Thurston County*, 169 Wn. App. 862, 867–68, 282 P.3d 1150 (2012); *Kearney v. Kearney*, 95 Wn. App. 405, 417, 974 P.2d 872, *review denied*, 138 Wn.2d 1022, 989 P.2d 1137 (1999). An appeal is frivolous if there are “no debatable issues upon

which reasonable minds might differ, and it is so totally devoid of merit that there was no reasonable possibility' of success." *In re Recall Charges Against Feetham*, 149 Wn.2d 860, 872, 72 P.3d 741 (2003) (internal quotation marks omitted) (quoting *Millers Cas. Ins. v. Briggs*, 100 Wn.2d 9, 15, 665 P.2d 887 (1983)). Appellant's appeal is frivolous: she presented no debatable point of law, and the chance for reversal is nonexistent. The Court should accordingly award attorney fees to Mr. Hink.

E. CONCLUSION

The court's imposition of a civil anti-harassment order was authorized by law. Appellant cannot show otherwise. Appellant's appeal is a continuation of her harassment against Mr. Hink. Her arguments are devoid of merit. The Court should deny the appeal and award attorney fees to Mr. Hink for having to respond to this feckless appeal.

DATED this 10th day of August 2020.



Lily K. Wilson, WSBA # 55009
Attorney for Matthew Hink

MORGAN HILL, P.C.

August 10, 2020 - 2:12 PM

Transmittal Information

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