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State of Washington  
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Court of Appeals No. 331318  
Grant Co. Superior Court Cause No. 12-3-00436-6

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COURT OF APPEALS, DIVISION III  
STATE OF WASHINGTON

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SASCHA MICHAEL ALEXANDER,

*Appellant,*

vs.

RHONDA ALEXANDER,

*Respondent.*

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RESPONDENT'S BRIEF

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George Ahrend, WSBA #25160  
Ahrend Law Firm PLLC  
100 E. Broadway Ave.  
Moses Lake, WA 98837  
(509) 764-9000

Attorneys for Respondent

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## I. INTRODUCTION

In this appeal arising from marital dissolution proceedings, Sascha Michael Alexander, who is Respondent in the superior court and Appellant on appeal, purports to “assert[] a collateral attack on each and every decision of the trial court, including all interlocular [sic] decisions.” App. Br., at 1 (brackets added). However, Sascha Alexander only assigns error and provides argument regarding the contents of the appellate record and alleged “bias” of the superior court commissioner in pretrial proceedings that he claims tainted the superior’s final parenting plan. With respect to the appellate record, he has failed to follow the proper procedure for making a challenge, and his challenge is meritless in any event. With respect to the final parenting plan, the superior court entered the plan only after trial, and there is no showing of bias on the part of the superior court commissioner, nor is there any showing that the commissioner’s alleged bias in pretrial proceedings had any effect on the final plan. The superior court judge entered findings after a 6-day trial, based on substantial evidence that supports the final parenting plan. As a result, Rhonda Alexander, who is Petitioner in the superior court and Respondent on appeal, asks the Court to affirm the superior court in all respects.

## II. RESTATEMENT OF ASSIGNMENTS OF ERROR

In the “Assignments of Error” section of Sascha Alexander’s opening brief, the following alleged errors can be ascertained:

***Appellate record:*** “The trial court erred in its reliance upon a record which was developed without regard for the inherent bias of the system in place in Grant County,” App. Br., at 4; and “[w]hen the father sought a recording of the proceeding [regarding his motion for spousal support], the record was deleted,” *id.* at 5 (brackets added).

***Alleged bias of the superior court commissioner:*** “All of the decisions of the trial court are tainted with this bias [i.e., the inherent bias of the system in place in Grant County] as the Court’s failure to recuse the Commissioner who made the pretrial decisions when the Commissioner was incapable of acting without bias,” App. Br., at 4 (brackets added); and “according to the Closing Argument Summary of the father, Chlarson was a personal friend of Respondent’s counsel and is now an associate in her office,” *id.* at 4.

***The superior court judge’s ostensible “reliance” on pretrial orders entered by the commissioner:*** “The trial court erred in relying upon pretrial orders issued by Commissioner Melissa Chlarson,” App. Br., at 4 (brackets added); “[t]he trial court erred in its final decision on dissolution in its determination of ultimate custody, because the trial court relied in part on the biased rulings of the Commissioner, which created an insurmountable barrier to [Sascha Alexander],” *id.* at 5 (brackets added); and “[c]onsequently, the trial court erred in entering its Parenting Plan (CP 1169-1177), its Findings of Facts and Conclusions of Law (CP 1108-1127), its Order of Child Support (CP 1181-1208), its Decree of Dissolution (CP 1128-1146), and its Order on Fees for Intransigence (CP 1216-1217),” *id.* at 5 (brackets added).

***Granting custody of the parties’ children to Rhonda Alexander and imposing parenting restrictions on Sascha Alexander in the parties’ final parenting***

**plan:** “The trial court erred in awarding custody to the mother,” App. Br., at 5; and “[t]he trial court erred when it failed to restrain the mother,” *id.* at 4 (brackets added). “The trial court erred when it ... instead restrained the father,” *id.* at 4 (ellipses added); and “limit[ed] visitation of the father to supervised visits only,” *id.* at 5 (brackets added).

### **III. RESTATEMENT OF ISSUES PERTAINING TO ASSIGNMENTS OF ERROR**

1. Should the Court consider Sascha Alexander’s challenge to the appellate record when he has failed to comply with RAP 9.13?
2. Does Sascha Alexander’s challenge to the appellate record have any merit when it is contradicted by the court certified transcriptionist that he selected?
3. Is there any competent evidence in the record of “bias” on the part of the superior court commissioner who heard certain pretrial proceedings?
4. Is there any competent evidence in the record that alleged bias on the part of the superior court commissioner tainted the final parenting plan entered by the superior court judge following trial?
5. Are the superior court judge’s findings in the parties’ final parenting plan supported by substantial evidence?
6. Should the Court entertain any other alleged errors in the absence of assignments of error, argument and authority?

### **IV. RESTATEMENT OF THE CASE**

#### **A. Final parenting plan.**

Following a 6-day trial, the superior court entered a final parenting plan for the parties’ three children. CP 1169-80. The

parenting plan awarded custody of the children to Rhonda Alexander and declined to order any visitation for Sascha Alexander until he completes a psychological evaluation and follows through with treatment recommendations. CP 1170 & 1172 (¶¶ 3.1 & 3.10). The court restricted his parenting based on his physical and emotional abuse of the children, a history of domestic violence, and a long-term impairment that interferes with his ability to parent. CP 1170 (¶¶ 2.1-2.2). The findings are supported by the testimony and report of the guardian ad litem. RP 3, at 6-50; CP 169-79; Ex. 93. The parenting plan does not indicate any reliance on the temporary parenting plan or other orders previously entered by the superior court commissioner. *See* CP 1169-80.

**C. Appellate record.**

This appeal has been delayed considerably by Sascha Alexander's complaints about the report of proceedings.<sup>1</sup> (He does not appear to make any complaints about the clerk's papers.) A declaration submitted by the court approved transcriptionist he selected establishes that his complaints are baseless.<sup>2</sup> The superior

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<sup>1</sup> *See* Objection to Motion for Extension of Time to File Opening Brief, filed herein on June 19, 2017. A copy of the objection is reproduced in the Appendix to this brief.

<sup>2</sup> *See* Declaration of Susan L. Robson. The declaration is being transmitted to the Court pursuant to a supplemental designation of clerk's papers. In the meantime, the declaration is reproduced in the Appendix to this brief.

court issued an order settling the appellate record on December 1, 2017. CP 1218-19. Sascha Alexander has not filed a motion objecting to the order settling the record as required by RAP 9.13.

**C. Sascha Alexander’s opening brief.**

**1. Statement of the case.**

Sascha Alexander’s “Statement of the Case” does not contain any factual statements or citations to the record. *See* App. Br., at 5-6. However, he includes a summary of facts in the “Argument” section of his brief, which states as follows:

The record before the court indicates that the evidence provided to the court detailing repeated acts of domestic violence perpetrated against the husband by the wife, threats of suicide by her, and her arrest and conviction for Fourth Degree Assault, were all before the court, and were systematically ignored by Commissioner Melissa Chlarson. Her pretrial rulings ultimately biased this case before the trial judge. The entry of temporary orders, CP 272.1 [sic] failure to address the father’s motion for spousal support CP 601-608, the Order Granting Motion to Compel, CP 637-638, the Order on Contempt, CP 702-707, the Order on Contempt, CP 873-874, and the Order Requiring Respondent to Submit to CR 35 Examination (CP 1178-1180).

*Id.* at 6 (brackets added; parens. in original).

While this quotation cites the orders that allegedly resulted from bias on the part of the superior court commissioner, Sascha Alexander does not cite any competent record evidence that the commissioner was, in fact, biased. Furthermore, he does not cite any

competent record evidence establishing that the superior court judge who issued the parties' final parenting plan at the conclusion of trial relied upon or was influenced by the commissioner's pretrial rulings.

## **2. Argument.**

The "Argument" section of Sascha Alexander's brief quotes a number of different authorities for the proposition that judicial officers should be fair and impartial. *See* App. Br., at 6-9 (quoting Wash. Const. Art. IV, § 28, RCW 2.24.020, several outdated provisions of the Code of Judicial Conduct, and *In re Sanders*, 135 Wn. 2d 175, 955 P.2d 369, 374-75 (1998)). The brief also adverts to a statute governing disqualification of administrative hearing officers under the Administrative Procedure Act. *See* App. Br., at 9 (citing RCW 34.05.425). Lastly, the brief invokes the appearance of fairness doctrine. *See id.* at 9. The relevance of these authorities is not explained, although they presumably relate to the claim that the superior court commissioner was biased against Sascha Alexander. *See id.* at 6-9. Other than these authorities, however, there is no argument or authority regarding any other assignments of error.

### **3. Conclusion.**

In the “Conclusion” section of his brief, Sascha Alexander states:

Commissioner Chlarson demonstrated a complete disregard for the arguments and the evidence of the father. Any reasonable review of the police records alone, which were before the court without objection, would render a conclusion that it was the mother who presented the danger to the children, especially given her conviction for Fourth Degree Assault. Yet the court not only disregarded that evidence, but forced the father into supervised visitation, and required him to submit to a mental examination .... The record is replete with repeated acts of gender bias on the part of the Court Commissioner, who, despite her predisposition, refused to recuse herself, and instead, proceeded with acts of partiality. The record before the court sustains this position, and Petitioner seeks a remand to the Superior Court, a change of venue, and a retrial of all issues.

App. Br., at 9-10 (ellipses added). This simply reiterates the claim that the superior court commissioner was biased, again without any citation to competent record evidence.

### **V. ARGUMENT**

The Court should affirm the superior court in all respects because Sascha Alexander’s appeal is without merit. He has not followed the proper procedure to challenge the record on appeal. His allegation that bias on the part of the superior court commissioner tainted the superior court judge’s decision to grant custody to Rhonda Alexander and restrict his parenting is unsupported by the

record. The superior court judgment entered a final parenting plan after a 6-day trial, and the plan is based on findings supported by substantial evidence. The remaining assignments of error are unsupported by any argument or authority and should not be considered.

**A. Sascha Alexander has not followed the proper procedure to challenge the record on appeal.**

RAP 9.13 provides that “A party may object to a trial court decision relating to the record by motion in the appellate court.” Sascha has filed no such motion and his complaints about the appellate record are not properly before the Court. The complaints are baseless in any event, as attested by the transcriptionist he selected. *See* Appendix.

**B. There is no evidence of bias on the part of the superior court commissioner, or that the pretrial rulings of the commissioner had any influence on the final parenting plan entered by the superior court after a 6-day trial.**

Sascha Alexander hinges most of his assignments of error upon the claim that alleged bias on the part of the superior court commissioner who heard certain pretrial matters tainted the final parenting plan and other final orders entered by the superior court judge after trial. As an initial matter, he does not overcome the “presumption that a judge performs his or her functions regularly

and properly without bias or prejudice,” *Kay Corp. v. Anderson*, 72 Wn. 2d 879, 885, 436 P.2d 459 (1967); accord *In re Davis*, 152 Wn. 2d 647, 692 & n.105, 101 P.3d 1, 26 (2004) (citing *Kay Corp.* for this proposition). This presumption applies both to the allegedly biased commissioner and the allegedly tainted judge. The fact that these two judicial officers ruled against Sascha Alexander in the course of certain proceedings does not, ipso facto, constitute evidence of bias.

More importantly, however, Sascha Alexander offers no competent record evidence to substantiate the claim that the superior court commissioner was biased, or that the commissioner’s pretrial rulings affected any decisions of the judge. His appeal should be rejected because it is completely lacking record support.

The judge’s decisions were based on the evidence offered at trial rather than any pretrial decisions of the commissioner. In this sense, any alleged bias on the part of the commissioner can only be deemed to constitute harmless error. See *State v. Gunderson*, 181 Wn. 2d 916, 926, 337 P.3d 1090, 1095 (2014) (noting non-constitutional harmless error standard requires the court to decide whether the outcome of trial would have been materially different).

With respect to the final parenting plan in particular, the grant of custody of the parties’ children to Rhonda Alexander and the

limitations imposed on the parenting of Sascha Alexander are based on unchallenged findings of fact that are supported by substantial evidence. Findings of fact are deemed to be verities on appeal so long as they are supported by substantial evidence. *See, e.g., In re Marriage of Black*, 188 Wn. 2d 114, 127, 392 P.3d 1041, 1048 (2017). In this case, the superior court judge's final parenting plan is supported by substantial evidence presented at trial, including the testimony and report of the guardian ad litem. RP 3, at 6-50; CP 169-79; Ex. 93.

**C. The remaining assignments of error should not be considered because they are unsupported by any argument or authority.**

The only argument offered by Sascha Alexander consists of quotations of authority supporting the unexceptional proposition that judicial officers must be fair and impartial. *See App. Br.*, at 6-9. No argument is offered in support of any other assignments of error. Accordingly, the Court should decline to consider any other issues. *See, e.g., Howell v. Spokane & Inland Empire Blood Bank*, 117 Wn. 2d 619, 624, 818 P.2d 1056, 1058 (1991) (stating “[i]f a party fails to support assignments of error with legal arguments, they will not be considered on appeal”; brackets added); *Cowiche Canyon Conservancy v. Bosley*, 118 Wn. 2d 801, 809, 828 P.2d 549, 553

(1992) (declining to consider arguments “not supported by any reference to the record nor by any citation of authority”); *Hiatt v. Walker Chevrolet Co.*, 120 Wn. 2d 57, 64, 837 P.2d 618, 622 (1992) (declining to address issue without adequate briefing).

## VI. CONCLUSION

Based on the foregoing, Rhonda Alexander asks the Court to affirm the decision of the superior court in all respects.

Respectfully submitted this 19th day of March, 2018.

s/George M. Ahrend  
George M. Ahrend, WSBA #25160  
Ahrend Law Firm PLLC  
100 E. Broadway Ave.  
Moses Lake, WA 98837  
Phone (509) 764-9000  
Facsimile (509) 464-6290  
Email [gahrend@ahrendlaw.com](mailto:gahrend@ahrendlaw.com)

Attorneys for Respondent

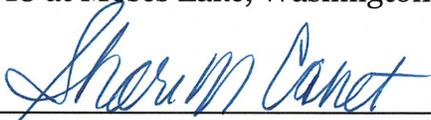
## CERTIFICATE OF SERVICE

The undersigned does hereby declare the same under oath and penalty of perjury of the laws of the State of Washington:

On the date set forth below, I served the document to which this is annexed by email and U.S. postal delivery, postage prepaid, as follows:

Stephen Pidgeon  
Stephen Pidgeon Attorney at Law PS  
1523 132nd St SE Ste C  
Everett, WA 98208-7200  
[spidgeon007@gmail.com](mailto:spidgeon007@gmail.com)  
[stephen.pidgeon@comcast.net](mailto:stephen.pidgeon@comcast.net)

Signed on March 19, 2018 at Moses Lake, Washington.

  
\_\_\_\_\_  
Shari M. Canet, Paralegal

## **APPENDIX**

Objection to Motion for Extension of time to File Opening Brief..	A-1
Declaration of Susan L. Robson.....	A-11



### III. REFERENCE TO RECORD

This appeal has been pending for more than 2.5 years without any discernible progress. Appellant Sascha Michael Alexander has repeatedly delayed the proceedings, as evidenced by the record and summarized in the following table:

<b>Date</b>	<b>Action</b>
12/17/2014	Notice of Appeal (331318) filed
01/14/2015	Appellant's motion for order of indigency filed with Court of Appeals
02/11/2015	Letter from trial court indicating Notice of Appeal processed and forwarded to Court of Appeals
02/23/2015	Court of Appeals letter acknowledging receipt of Notice of Appeal; requesting proof of service; and setting motion to dismiss for failure to pay filing fee
03/05/2015	Appellant's motion for order of indigency received
03/10/2015	Trial court's finding of indigency
04/08/2015	Court of Appeals consideration of motion to dismiss for failure to pay filing fee
04/28/2015	Supreme Court motion for expenditure of public funds
05/04/2015	Court of Appeals letter with Supreme Court Order Denying Motion for Expenditure of Public Funds and setting date for motion to dismiss for abandonment or payment of filing fee
05/11/2015	Letter from Supreme Court re consideration of indigency
05/27/2015	Filing fee paid
05/27/2015	Ahrend Law Firm appears in appellate proceeding
05/28/2015	Appellant's motion for stay filed
05/29/2015	Supreme Court Order re Appellant's Motion for Expenditure of Public Funds
05/29/2015	Motion to dismiss for abandonment or payment of filing fee on Commissioner's docket
06/03/2015	Perfection letter from Court of Appeals
06/16/2015	Court of Appeals letter acknowledging receipt of motion to stay; setting deadline for response

<b>Date</b>	<b>Action</b>
06/26/2015	Deadline for Respondent's response to motion to stay
06/26/2015	Respondent's Notice of No Objection to Motion for Stay filed
07/02/2015	Court of Appeals letter granting stay; setting deadline for status report
07/13/2015	Deadline for Appellant to file proof of service of notice of appeal
08/03/2015	Deadline for Respondent's status report re stay; and setting deadline for proof of service of notice of appeal
09/08/2015	Respondent's proof of service of notice of appeal filed
09/08/2015	Respondent's Status Report filed
09/10/2015	Court of Appeals letter continuing stay status and setting deadline for status report re stay
10/12/2015	Deadline for status report re stay
10/13/2015	Respondent's Status Report filed
10/20/2015	Court of Appeals letter continuing stay status and setting deadline for status report re stay
11/18/2015	Deadline for status report re stay
12/10/2015	Court of Appeals letter indicating status report late and setting deadline for filing same
12/14/2015	Respondent's Status Report filed
12/17/2015	Court of Appeals letter continuing stay status and setting deadline for status report re stay
12/21/2015	Deadline for status report re stay
02/10/2016	Deadline for status report re stay
02/18/2016	Court of Appeals letter continuing stay status and setting deadline for status report re stay
02/22/2016	Respondent's Status Report filed
02/25/2016	Court of Appeals letter continuing stay status and setting deadline for status report re stay
02/26/2016	Order Denying Respondent's Motion for Reconsideration filed in trial court
02/29/2016	Deadline for status report re stay
03/24/2016	Deadline for status report re stay
03/29/2016	Respondent's motion for extension received (extension of what is unclear from his pleading; not found on Court of Appeals docket)
03/29/2016	Respondent's motion to consolidate (superior court cases) received

<b>Date</b>	<b>Action</b>
03/30/2016	Notice of Appeal (343642) filed
04/18/2016	Respondent's Status Report filed
04/28/2016	Court of Appeals letter setting matter for motion to dismiss for failure to timely file
04/29/2016	Court of Appeals letter continuing stay status and setting deadline for status report re stay
05/11/2016	Deadline for Appellant's memo on issue of timeliness
05/18/2016	Deadline for Respondent's memo on issue of timeliness
05/25/2016	Motion to dismiss on Commissioner's docket
05/31/2016	Deadline for status report re stay
06/10/2016	Appellant's memo re issue of timeliness received by Ahrend Law Firm (not indicated received by Court of Appeals per online docket report)
06/13/2016	Respondent's Status Report filed
06/17/2016	Court of Appeals letter continuing stay status and setting deadline for status report re stay
06/27/2016	Court of Appeals ruling denying motion to dismiss to prevent gross miscarriage of justice; and consolidates appeals 331318 and 343642
06/27/2016	Stay lifted
06/27/2016	Perfection letter from Court of Appeals
07/27/2016	deadline for status report re stay per 6/17/2016 ruling
07/27/2016	Deadline (per 6/27/2016 perfection letter) for Designation of Clerk's Papers
07/27/2016	Deadline (per 6/27/2016 perfection letter) for Statement of Arrangements
08/01/2016	Court of Appeals letter indicating Designation of Clerk's Papers and Statement of Arrangements not file and setting deadline to file or sanctions
08/15/2016	Appellant's motion for extension to file Designation of Clerk's Papers and Statement of Arrangements filed
08/11/2016	deadline for Designation of Clerk's Papers and Statement of Arrangements
08/17/2016	Court of Appeals letter granting extension of time to file Designation of Clerk's Papers and Statement of Arrangements
09/09/2016	Deadline for Designation of Clerk's Papers and

<b>Date</b>	<b>Action</b>
	Statement of Arrangements
09/26/2016	Deadline (per 6/27/2016 perfection letter) for VRP per RAP 9.5(a)
09/28/2016	Appellant's motion for extension to file Designation of Clerk's Papers and Statement of Arrangements received
10/07/2016	Court of Appeals letter granting extension, setting deadline to file or case referred to commissioner for abandonment and dismissal
10/17/2016	Deadline for Designation of Clerk's Papers and Statement of Arrangements
11/09/2016	Court of Appeals letter advising failure to file Designation of Clerk's Papers and Statement of Arrangements and case referred for dismissal for abandonment
11/30/2016	Court of Appeals consideration of motion to dismiss for abandonment
11/30/2016	Respondent's Designation of Clerk's Papers and Statements of Arrangements filed
01/30/2017	VRP filed by Court Reporter Tom Bartunek
02/02/2017	Appellant's motion for extension filed for Court Reporter Susan Robson additional 30 days to complete other VRPs
02/02/2017	Court of Appeals letter granting extension and setting deadline for filing of VRP
03/01/2017	deadline for VRPs
03/13/2017	Appellant's motion for extension filed for additional time to file additional VRPs
03/13/2017	Court of Appeals letter granting extension and setting new deadline for filing VRP
03/22/2017	deadline for VRPs
04/04/2017	VRPs filed by Susan Robson
05/19/2017	Appellant's opening brief due
05/23/2017	Appellant's motion for extension of time to file opening brief
05/26/2017	Objection to Motion for Extension for Time to File Opening Brief
05/26/2017	Court of Appeals letter granting extension and setting new deadline for filing Appellant's Brief
06/19/2017	deadline for Appellant's brief

Date	Action
06/19/2017	Appellant's motion for extension of time to file opening brief

#### IV. GROUNDS FOR RELIEF REQUESTED

Appellant Sascha Michael Alexander's motion for another extension of time to file his opening brief should be denied. RAP 18.8(a) provides that "[t]he appellate court may, on its own initiative or on motion of a party ... enlarge ... the time within which an act must be done in a particular case *in order to serve the ends of justice*[" (Brackets, ellipses & emphasis added.) Appellant has not attempted to make the requisite showing, and the ends of justice would not be served by another extension of time in this case. "Because the emotional and financial interests affected by appeals of marriage dissolution decrees are best served by finality, trial court decisions in such proceedings are rarely changed on appeal." *In re Marriage of Robbins & Valdez*, noted at 192 Wn. App. 1003, 2015 WL 9594348, at \*4 (Wn. App., Div. 2, Dec. 29, 2015) (citing *In re Marriage of Landry*, 103 Wn. 2d 807, 809, 699 P.2d 214 (1985)); *see also In re Marriage of Rostrom*, 184 Wn. App. 744, 751, 339 P.3d 185 (2014) (noting "the strong interest in the finality of marriage dissolution proceedings"); *In re Marriage of Neumiller*, 183 Wn. App. 914, 920, 335 P.3d 1019 (2014) (noting

"trial courts are accorded great discretion in family law matters due to the need for finality and certainty"). The same interest in finality militates against continuing these proceedings indefinitely.

In fact, this appeal should be dismissed. RAP 18.9(c) provides that "[t]he appellate court will, on motion of a party, dismiss review of a case (1) for want of prosecution if the party seeking review has abandoned review, or (2) if the application for review is frivolous, moot, or solely for the purpose of delay[.]" (Brackets added.) Appellant's conduct in this case is tantamount to abandonment of review under subsection (1) of this rule, and appears to be frivolous and solely for the purpose of delay within the meaning of subsection (2). The Court would be justified in dismissing this appeal under either subsection. If the Court is not inclined to dismiss the appeal, however, at a minimum the Court should require Appellant to identify non-frivolous issues that he intends to raise and set a hard deadline for him to file his opening brief.

DATED this 19<sup>th</sup> day of June, 2017.

Ahrend Law Firm PLLC  
Attorneys for Respondent

s/George M. Ahrend  
George M. Ahrend, WSBA #25160  
Ahrend Law Firm PLLC  
100 E. Broadway Ave.  
Moses Lake, WA 98837  
Phone (509) 764-9000  
Facsimile (509) 464-6290  
Email [gahrend@ahrendlaw.com](mailto:gahrend@ahrendlaw.com)

**CERTIFICATE OF SERVICE**

The undersigned does hereby declare the same under oath and penalty of perjury of the laws of the State of Washington:

On the date set forth below, I served the document to which this is annexed First Class Mail, postage prepaid, as follows:

Sascha Michael Alexander  
P.O. Box 927  
Moses Lake, WA 98837

Signed on June 19, 2017 at Moses Lake, Washington.

  
\_\_\_\_\_  
Shari M. Canet, Paralegal

**AHREND LAW FIRM PLLC**

**June 19, 2017 - 2:29 PM**

**Transmittal Information**

**Filed with Court:** Court of Appeals Division III  
**Appellate Court Case Number:** 33131-8  
**Appellate Court Case Title:** In re Marriage of: Rhonda Alexander and Sascha Alexander  
**Superior Court Case Number:** 12-3-00436-6

**The following documents have been uploaded:**

- 331318\_Answer\_Reply\_to\_Motion\_20170619142754D3101193\_1216.pdf  
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Objection to Motion for Extension of Time to File Opening Brief

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OCT 06 2017

KIMBERLY A. ALLEN.  
GRANT COUNTY CLERK

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2  
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4  
5  
6 SUPERIOR COURT OF WASHINGTON  
COUNTY OF GRANT

7  
8 In re the Matter of:

9 RHONDA ALEXANDER,

10 Petitioner,

11 and

12 SASCHA ALEXANDER,

13 Respondent.

NO. 12-3-00436-6

ORIGINAL

14 DECLARATION OF SUSAN L. ROBSON  
15

16  
17 I declare under penalty of perjury that the following is  
18 true and correct under the laws of the State of Washington.

19 I am an approved transcriptionist for Grant County and  
20 was hired by Mr. Sascha Alexander to prepare a transcript of  
21 the following: 12/7/15; A bench conference regarding a  
22 continuance. 8/25/15; Testimony of Ms. Brandy West.  
23 9/21/15; Testimony of Ms. Noni McNinch. 02/01/16; Two 911  
24 phone calls.

25 The entire transcript consisted of 176 pages. Within

1 those pages there were approximately 98 times that were  
2 marked as inaudible and were listed as (inaudible). The  
3 inaudible portions consisted of a few words, none of which  
4 were large blocks of time. There was one section on page 28  
5 where the record skipped for five seconds, and the  
6 transcript indicates where that occurred. The amount of  
7 inaudible portions were no more excessive than other  
8 transcripts that I have done for Grant County. When there's  
9 a witness testifying from the witness stand and the attorney  
10 is walking between microphones you lose sound for a few  
11 seconds, but nothing excessive.

12 Mr. Alexander and I have been communicating in regard to  
13 the inaudible portions. He has requested that I list out  
14 the inaudibles with the times. For example: If an inaudible  
15 started at 10:00:01 and last to 10:00:03 he wants the times  
16 listed on all the inaudibles throughout the 176 pages.  
17 Unfortunately, I would have to listen to the entire  
18 testimony of what was transcribed to locate the times  
19 associated with the inaudibles. With 98 inaudibles that is  
20 not a possibility with my current caseload.

21 The portions I transcribed matched up with the times  
22 listed on the trial minutes provided by Grant County  
23 Superior Court with the CDs of the hearings.

24 I accurately transcribed the portions requested by Mr.  
25 Alexander using the CDs that were received by me to my post

1 office box on or about December 19, 2016 from Grant County  
2 Superior Court to the best of my ability.

3  
4 Signed this 2<sup>nd</sup> day of October, 2017 at Clayton, WA.  
5 99110.

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8 Susan L. Robson  
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SUPERIOR COURT OF WASHINGTON FOR GRANT COUNTY

IN RE THE MATTER OF:

**o. 12-3-00436-6**

RHONDA ALEXANDER,

DECLARATION RE ELECTRONIC  
FILING (GR-17)

Petitioner,

and

SASCHA ALEXANDER,

Respondent.

Pursuant to the provisions of GR 17, I declare as follows:

- 1. I am the person who received the foregoing electronic transmission for filing.
- 2. My work address is 100 E. Broadway Ave., Moses Lake, WA 98837.
- 3. My work phone number is (509) 764-9000.
- 4. I received the document from Susan Robson via electronic transmission at

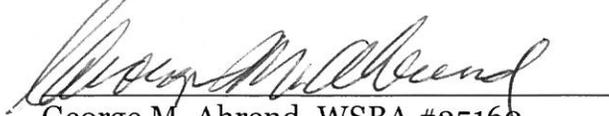
[gahrend@ahrendlaw.com](mailto:gahrend@ahrendlaw.com).

5. I have examined the foregoing document entitled **DECLARATION OF SUSAN L. ROBSON**, determined that it consists of six (6 pages) (including any exhibits), including this Declaration, and it is complete and legible.

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I certify under penalty of perjury under the laws of the State of Washington that  
the above is true and correct.

Signed at Moses Lake, Washington this 4th day of October, 2017.

  
George M. Ahrend, WSBA #25160  
Attorney for Petitioner

1 **CERTIFICATE OF SERVICE**

2 The undersigned does hereby declare the same under oath and penalty of perjury  
3 of the laws of the State of Washington:

4 On the date set forth below, I served the document to which this is annexed by  
5 [X] email and [X] First Class Mail, postage prepaid, as follows:

6 Sascha M. Alexander  
7 P.O. Box 927  
8 Moses Lake, WA 98837  
9 Email: [saschamalexander@yahoo.com](mailto:saschamalexander@yahoo.com)

10 Signed at Moses Lake, Washington on October 4, 2017.

11   
12 \_\_\_\_\_  
13 Shari M. Canet, Paralegal

**AHREND LAW FIRM PLLC**

**March 19, 2018 - 2:49 PM**

**Transmittal Information**

**Filed with Court:** Court of Appeals Division III  
**Appellate Court Case Number:** 33131-8  
**Appellate Court Case Title:** In re Marriage of: Rhonda Alexander and Sascha Alexander  
**Superior Court Case Number:** 12-3-00436-6

**The following documents have been uploaded:**

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Sender Name: George Ahrend - Email: gahrend@ahrendlaw.com  
Address:  
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