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Division III
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No. 35795-3-III

IN THE COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON

In re the marriage of:
ALICIA ANNE MARROQUIN,
Petitioner/Respondent,

v.

RAUL MARROQUIN, JR.,
Respondent/Appellant.

APPELLANT'S REPLY BRIEF

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III. ARGUMENT

A. Standards of review

Respondent argues an order of child support is reviewed for abuse of discretion. BR 12-13. However, the court reviews *de novo* a trial court's interpretation of a settlement agreement. *In re: Marriage of Pascale*, 173 Wn. App. 836, 841, 295 P.3d 805 (2013). And whether the trial court violated appellant's due process rights is an issue of law reviewed *de novo*. *Red Oaks Condominium Owners Association v. Sundquist Holdings, Inc.*, 128 Wn. App. 317, 321, 116 P. 3d 404 (2005); *Public Utility Dist. No. 2 of Grant County v. N. Am. Foreign Trade Zone Indus., LLC*, 125 Wn. App. 622, 629, 105 P.3d 441 (2005).

Respondent misplaces reliance upon *In re: A.L.*, 185 Wn. App. 225, 340 P. 3d 260 (2014), as that case did not involve interpretation of a settlement agreement in a marriage dissolution. BR 12-13.

B. Respondent waived her argument that appellant failed to refer the meaning of the term "litigate" back to the arbitrator for interpretation.

Respondent did not raise the issue of appellant's alleged failure to refer the meaning of the term "litigate" back to the arbitrator until her counsel filed a letter on December 12, 2017. CP 232. The court had already ruled on October 31, 2017 that there was no need for live testimony on the issue of deviation. CP 30. Respondent did not raise appellant's alleged failure to refer the meaning of the term "litigate" back

to the arbitrator in her response filed on October 31, 2017 to appellant's proposed pre-trial order. CP 28. Respondent therefore waived the right to assert appellant's alleged failure to refer the meaning of the term "litigate" back to the arbitrator. *Harting v. Barton*, 100 Wn. App. 954, 962, 6 P.3d 91, review denied, 142 Wash.2d 1019, 16 P.3d 1266 (2001).

Moreover, the letter of respondent's counsel filed in this case on December 12, 2017 was filed on the same day as was the final Order for Support. CP 232-33; CP 207-233. The letter was therefore untimely under Walla Walla County Superior Court Local Rule 7 (b) (2).

C. The trial court violated Washington Constitution Article 1, § 10 by deciding appellant's request for live testimony on the deviation issue outside of the courtroom.

Respondent argues appellant failed to file a motion under CR 7 regarding his request for live testimony. BR 14-17. Respondent fails to identify where in the record below she made an objection to appellant's failure to file such a motion. Respondent's argument therefore should not be considered. RAP 2.5 (a); *Pettit v. Dwoskin*, 116 Wn. App. 466, 470 n.5, 68 P. 3d 1088 (2003).

Respondent's discussion of *State v. Jones*, 185 412, 421, 372 P. 3d 755 (2016) misses the mark. BR 15-16. The experience and logic test discussed in *Jones* applies here. Experience and logic dictate respondent's request for live testimony on the deviation issue should have been

presented by a written motion in a courtroom with a court reporter present.
CR 7 (b) (1).

Respondent also fails to address the importance of the courtroom. As discussed in *State v. Jamie*, 168 Wn. 2d 857, 862, 233 P. 3d 554 (2010) (“[T]he setting that the courtroom provides is itself an important element in the constitutional conception of trial, contributing a dignity essential to ‘the integrity of the trial’ process.” (Quoting *Estes v. Texas*, 381 U.S. 532, 561, 85 S. Ct. 1628, 14 L.Ed.2d 543 (1965) (Warren, C.J., concurring) (quoting *Craig v. Harney*, 331 U.S. 367, 377, 67 S. Ct. 1249, 91 L. Ed. 1546 (1947))). By considering appellant’s request for live testimony outside of a courtroom, the trial court undermined the integrity of its decision.

Respondent argues appellant could have moved for a formal hearing on his request for live testimony, but did not, thereby waiving this issue on appeal. Br 15. Once again respondent fails to indicate where or when she raised this objection in the trial court. Respondent’s argument therefore should not be considered. RAP 2.5 (a); *Pettit v. Dwoskin*, 116 Wn. App. 470 n.5.

Respondent’s attempt to distinguish *Bennett v. Smith Bunday Britton*, PS, 156 Wn. App. 293, 234 P. 3d 326 (2010) also fails. BR 16. As discussed in *Bennett*, the core concern of Washington Constitution Article I, Section 10 is the public’s right to observe the operation of courts and the

conduct of judicial officers. That core concern was ill served by a hearing on appellant's request for live testimony outside of a courtroom with no court reporter present.

State v. Sublett, 176 Wn. 2d 58, 71, 292 P. 3d 715 (2012), cited by respondent, is not controlling here. In *Sublett*, during its deliberations, the jury submitted a question regarding the accomplice liability instruction. Counsel met in chambers to consider the question and agreed to the court's answer telling the jury to reread the instructions. No objection was made to this procedure or the answer itself. The written question and answer were put in the record, but there was no colloquy regarding the discussion in the verbatim report of the proceedings. 176 Wn. 2d 67. On appeal, the court concluded the procedure did not violate the defendant's right to a public trial:

No witnesses are involved at this stage, no testimony is involved, and no risk of perjury exists. **The appearance of fairness is satisfied by having the question, answer, and any objections placed on the record pursuant to CrR 6.15.** Similarly, the requirement that the answer be in writing serves to remind the prosecutor and judge of their responsibility because the writing will become part of the public record and subject to public scrutiny and appellate review. (Emphasis added).

176 Wn. 2d 77.

Here, the absence of a record of the hearing on October 31, 2017 distinguishes the facts here from the facts in *Sublett*.

Respondent invokes rules of construction of contracts. BR 18.

Contractual language must be interpreted in light of existing statutes and rules of law. *Tanner Electric Cooperative v. Puget Sound Power & Light Co.*, 128 Wash.2d 656 674, 911 P.2d 1301 (1996)(citing 3 Arthur L. Corbin, *Contracts* § 551, at 198 (1960)); *Wagner v. Wagner*, 95 Wn. 2d 94, 98-99, 621 P. 2d 1279 (1980); *Bort v. Parker*, 110 Wn. App. 561, 573, 42 P. 3d 980, *review denied*, 147 Wash.2d 1013, 56 P.3d 565 (2002).

Therefore, the meaning of the term “*litigated*” in paragraph 6 of Exhibit 2 to the Civil Rule 2 Agreement Reached Through Mediation in this case should be interpreted consistently with those decisions which hold due process of law requires a party faced with an obligation to provide child support to be afforded an opportunity to present evidence and cross-examine the obligee. *See Goldberg v. Kelly*, 397 U.S. 254, 269, 90 S. Ct. 1011, 25 L. Ed. 2d 287 (1970) and other cases cited at pages 9-11 of the Amended Brief of Appellant.

Respondent makes no attempt to interpret the term “*litigated*” consistently with those cases. Instead, respondent chooses to rely exclusively upon dictionary definitions of that term. BR 19. A more reasonable interpretation is one that recognizes the due process rights of the obligor spouse.

Respondent argues appellant had an opportunity to conduct discovery, but failed to do so, and while he did not have the opportunity for live

testimony, he did have the opportunity for meaningful judicial process.

BR 20. Respondent fails to support her argument with either citation to the record or to authority. Respondent's argument should therefore not be considered. RAP 10.3 (a) (6); *Eugster v. Washington State Bar Association*, 198 Wn. App. 758, 773, 397 P. 3d 13, review denied, 189 Wash.2d 1018, 404 P.3d 493 (2017).

D. The trial court violated appellant's right to due process of law by denying him an opportunity to present live testimony to establish grounds for deviation from the standard calculation.

Respondent argues the trial court satisfied due process as the process utilized gave appellant the full opportunity to present his facts and legal arguments on the downward deviation issue. BR 21-22. To the contrary, the refusal by the trial court to allow appellant the opportunity to present live testimony on the downward deviation issue and to cross-examine respondent on that issue violated appellant's right to due process of law, as explained in *Goldberg v. Kelly*, and *State Bureau of Child Support v. Garcia*, 132 Idaho 505, 975 P. 2d 793, 798 (Idaho App. 1999), *Volk v. Brame*, 235 Ariz. 462, 333 P. 3d 789 (2014), *Heidbreder v. Heidbreder*, 230 Ariz. 377, 284 P. 3d 888 (2012), *Flowers v. Flowers*, 799 NE 2d 1183 (Ind. App. 2003), *Rooney v. Rooney*, 478 N.W. 2d 545 (Minn. App. 1991), *Bellamy v. Bellamy*, 110 Ohio App. 3d 576, 674 N.S. 2d 1227 (1996), and *Valentine v. Valentine*, 149 Conn. App. 799, 90 A. 3d 300 (2014).

Respondent misplaces reliance upon *Aiken v. Aiken*, 187 Wn. 2d 491, 387 P. 3d 680 (2017). BR 22-23. In *Aiken*, the court held the father's fundamental liberty interest to make decisions regarding the care, custody, and control of his daughter was outweighed by an equally strong interest of the State in protecting children and preventing domestic violence or abuse. 187 Wn. 2d 501-02. Here, the State's interest is not as strong as it was in *Aiken*. Further, the deprivation in *Aiken* was only temporary. Further, in *Aiken*, the guarantee of *Mathews v. Eldridge*, 424 US 319, 96 S. Ct. 893, 47 L. Ed. 2d 18 (1976), that a person must be heard at a meaningful time and in a meaningful manner, was protected by the procedures in chapter 26.50 RCW. 187 Wn. 2d 503. *Aiken* is therefore distinguishable here.

In *Aiken*, the court mentioned in passing dictum in footnote 5 in *Gagnon v. Scarpelli*, 411 U.S. 778, 93 S. Ct. 1756, 36 L.Ed.2d 656 (1973). In that footnote, the Supreme Court recognized the possible use of substitutes for live testimony such as affidavits, depositions, and documentary evidence. 411 U.S. 782 n. 5. The court in *Aiken* went on to note Washington courts express a preference for live testimony and cross-examination of child victims. 187 Wn. 2d 503. *Aiken* does not support here the trial court's refusal to allow live testimony or cross-examination of respondent.

E. Respondent waived her argument that appellant failed to seek arbitration.

Respondent argues appellant failed to refer the meaning of the term “*litigate*” back to the arbitrator, he cannot seek a finding that the term demanded live testimony. BR 24-25. As previously stated, respondent waived this argument by failing to raise it in the trial court. *Harting v. Barton*, 100 Wn. App. 962.

F. The trial court erred in denying appellant’s request for a deviation from the standard deduction.

Deviation from the standard calculation should be allowed under RCW 26.19.075 (1) (d) when it is inequitable not to do so. *Marriage of Pollard*, 99 Wn. App. 48, 55, 991 P.2d 1201 (2000); *Marriage of Selley*, 189 Wn. App. 957, 960, 359 P. 3d 891 (2015). Respondent did not respond to this issue in her brief.

Respondent continues to rely upon *Marriage of Schnurman*, 178 Wn. App. 634, 316 P. 3d 514 (2013) and *Langford v. Langford*, 184 Wn. App. 1006 (2014). BR 28-29. Respondent fails to recognize the distinguishing features of that case, as noted by appellant in his opening brief. As noted therein, the parties in *Schnurman* spent substantially equal time with their two children. Further, the court in *Schnurman* found the obligor parent’s time with the children did not significantly increase the costs to support

them and a downward deviation would leave the obligee parent with insufficient funds to support the children. No such findings were made in this case.

In contrast to *Schnurman*, appellant produced substantial evidence of increased costs resulting from residential time spent with his son, and respondent will not be deprived of sufficient funds to support their son when he is in her care. CP 110, 126-52, CP 64-65, CP 214, CP 249. Thus, contrary to respondent's argument, appellant met the requirements for deviation under RCW 26.19.075 (1) (d). Consequently, it was inequitable for the trial court to fail to grant appellant his requested deviation.

Marriage of Pollard, Marriage of Selley, supra.

Respondent also misplaces reliance upon *Marriage of Langford*, 184 Wn. App. 1006 (2014 unpublished). *Langford* addressed a challenge to the sufficiency of a finding of fact under RCW 26.19.075 (3). Here, in contrast, the issue is whether appellant produced sufficient evidence of increased costs resulting from residential time with his son and whether, if a deviation is ordered, respondent will not be deprived of sufficient funds to support the son while he is in her care.

Respondent argues appellant is spending only 5 percent more than the 35 percent of the time with his child as contemplated by

the legislature, and that amount does not appear significant. BR

30. Respondent fails to support her argument with citation to authority, so it should not be considered. RAP 10.3 (a) (6); *Eugster v. Washington State Bar Association*, 198 Wn. App. 773.

Respondent argued she proved she would lack basic necessities for the child if deviation were permitted. BR 30-31. The evidence introduced by appellant establishes respondent has a good job and her net income is over \$4,000.00 per month. CP 214, CP 249. Respondent's expenses do not exceed her net income. CP 64-65. Respondent also receives monthly child support of \$712.00 per month. CP 250. Respondent thus enjoys monthly income of more than \$700 per month above her expenses.

Appellant also established that during the first seven months of 2017, respondent incurred monthly expenses averaging \$1,751.21 for eating out, beauty supplies, groceries, Amazon purchases and women's clothing. CP 69-72; CP 73-108. These expenditures illustrate that respondent does not need a child support payment of \$712.00 per month.

Appellant also established he has increased expenses due to the significant amount of time the child spends with him. CP 126-152. Appellant's expenses for his son include activities such as amusement parks, aquarium, museums, fishing and camping. CP 110. Appellant also expends money for his son for bedding, birthdays, books, boots and shoes, cable, clothes, fuel, haircuts, holidays, home supplies, lodging, meals,

medical copays, medicine, photography, sports and sports equipment, and travel expenses. CP 110. Appellant's monthly expenses exceed his monthly income even before considering the child support transfer payment. CP 65. Thus, it would be inequitable to require appellant to pay the full transfer payment when he needs those resources to support his son while he is in appellant's home.

As appellant's expenses increase as a result of the significant residential time spent with his son, it follows respondent's expenses are correspondingly decreased.

Respondent argues appellant's increased expenses are not the type of additional costs contemplated by the deviation. BR 31. Once again, respondent fails to support her argument with citation to authority, so it should not be considered. RAP 10.3 (a) (6); *Eugster v. Washington State Bar Association*, 198 Wn. App. 773.

In light of the foregoing, appellant asks the Court to reverse paragraphs 8, 9, 10 of the Final Child Support Order, Finding of Fact 21, paragraph 19 of the Final Divorce Order and the Order Denying Motion for Reconsideration, and to remand the case to the trial court for entry of an order of child support with a deviation from the standard calculation consistent with the evidence submitted by appellant.

G. The trial court erred in denying appellant's motion for reconsideration.

Error is assigned to the Order Denying Motion for Reconsideration.

CP 242-244. Appellant incorporates herein the arguments and authorities in paragraphs A through F, above.

H. Respondent's request for an award of attorney fees should be denied.

For the reasons set forth above, respondent is not entitled to assert she is the prevailing party in this appeal. Therefore, respondent's request for attorney fees under RCW 26.18.160 should be denied.

Respondent's request for attorney fees under RCW 26.09.140 should also be denied, as she has the assets and resources to pay her own attorney fees. *In re Marriage of Aiken*, 194 Wn. App. 159, 174-75, 374 P.3d 265 (2016); *Goodell v. Goodell*, 130 Wn. App. 381, 122 P. 3d 929 (2005).

I. Appellant requests an award of attorney fees and costs on appeal.

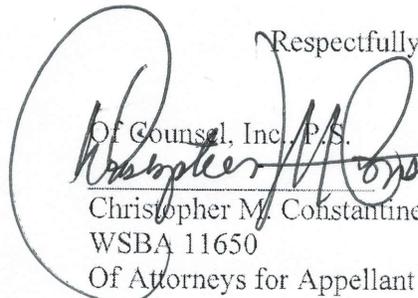
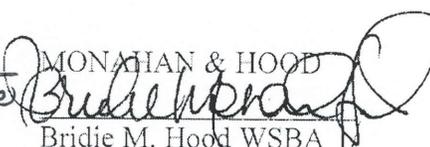
In exercising its discretion under RCW 26.09.140, the appellate court considers the issues' arguable merit on appeal and the parties' financial resources, balancing the financial need of the requesting party against the other party's ability to pay. *In re Marriage of Kim*, 179 Wn. App. 232, 256, 317 P. 3d 555, *review denied*, 180 Wash.2d 1012, 325 P.3d 914 (2014). The foregoing argument establishes the merit of the issues brought by appellant before this Court. Further, as indicated above, the record

here establishes appellant's need for an award of attorney fees and respondents' ability to pay the same.

VII. CONCLUSION

In light of the foregoing, Paragraph 3 of the Pretrial Order, Sections 8, 9, 10 of the Final Child Support Order, Finding of Fact 21, paragraph 19 of the Final Divorce Order and the Order Denying Motion for Reconsideration were entered in violation of due process and are therefore void and must be reversed. The case should be remanded to the trial court for entry of an order of child support with a deviation from the standard calculation consistent with the evidence submitted by appellant. The Court should deny respondent's request for attorney fees and grant appellant's request for attorney fees and costs.

Respectfully submitted,

 Of Counsel, Inc. P/S. Christopher M. Constantine WSBA 11650 Of Attorneys for Appellant	 MONAHAN & HOOD Bridie M. Hood WSBA WSBA 04074 Of Attorneys for Appellant
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VIII. Certificate of Service

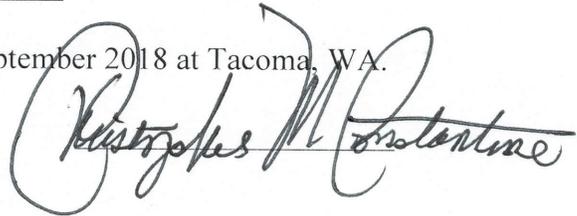
The undersigned does hereby certify that on September 4, 2018, he served a copy of Appellant's Reply Brief and served on the following individual(s) via the manner indicated below.

VIA Washington State Appellate Courts' Portal:

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Dated this 4th day of September 2018 at Tacoma, WA.

A handwritten signature in black ink, appearing to read "Christopher M. Carman". The signature is written in a cursive style with a large initial "C" and "M".

OF COUNSEL INC PS

September 07, 2018 - 11:23 AM

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