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SUPREME COURT
OF THE STATE OF WASHINGTON

In re the Custody of:

B.M.H., a minor child.

MICHAEL J. HOLT,

Respondent,

vs.

LAURIE L. HOLT,

Petitioner.

SUPPLEMENTAL BRIEF OF PETITIONER

SMITH GOODFRIEND, P.S.

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I. SUPPLEMENTAL STATEMENT OF THE CASE

Petitioner Laurie Holt is the biological mother of B.M.H., born August 10, 1999, whose father Benjamin died prior to his birth. (CP 82) Laurie married respondent Michael Holt on September 9, 1999; they have one biological child, born in April 1995.¹ (CP 19, 82) When Laurie and Michael divorced 21 months after they married, in June 2001, they entered into a parenting plan and child support order for their son, but not for Laurie's son B.M.H. (CP 19) Laurie allowed B.M.H. to accompany the parties' son on visits with Michael. (CP 83) As a teenager, the parties' son began residing primarily with Michael. (CP 83-84) B.M.H. has always remained in Laurie's primary care. (CP 83)

In late 2009, Laurie told Michael she intended to relocate with B.M.H., then age ten, 50 miles away to Castle Rock from Vancouver, where both parties then lived. (CP 83-84) On February 23, 2010, Michael filed a Non-Parental Custody Petition asserting that he was B.M.H.'s *de facto* parent, and also seeking custody under RCW ch. 26.10, alleging that Laurie was not a "suitable custodian" because "the respondent/mother intends to

¹ Before Laurie became involved with B.M.H.'s father, Benjamin Ensley, Laurie and Michael were in a relationship. (CP 81-82)

immediately relocate the child to a situation that is unstable and not in the child's best interests." (CP 1, 3-5) Michael's sole stated concern was that Laurie's decision to relocate to Castle Rock was not in B.M.H.'s best interests because it would take him out of his current school, "which is the only school he's ever attended, and taking him out of the current baseball program away from the children that he has grown up playing with." (CP 23)

Clark County Superior Court Judge Scott Collier dismissed the portion of Michael's petition seeking to establish himself as B.M.H.'s *de facto* father based on this Court's decision in ***Parentage of M.F.***, 168 Wn.2d 528, 228 P.3d 1270 (2010), which had rejected the application of the *de facto* parentage doctrine to former stepparents. (CP 143-45, 147-50) After dismissing the *de facto* parentage action, however, the trial court found adequate cause for Michael to pursue third party custody under RCW ch. 26.10. (CP 141-42) Acknowledging that any concern was "speculative," the trial court found that "if the Respondent/mother denies contact between Petitioner and minor child it would cause actual detriment to the minor child's growth and development if the relationship between the minor child and the Petitioner is not

protected and the Court has concerns that the mother *may* withhold the visitation contact in the future." (CP 142, emphasis added; 7/15 RP 20-21, 24)

This Court has accepted review of Division Two's published decision reinstating the *de facto* parentage petition and affirming the order finding adequate cause for Michael's third party custody petition. ***Custody of B.M.H.***, 165 Wn. App. 361, 267 P.3d 499 (2011), *rev. granted*, 173 Wn.2d 1031 (2012).

II. SUPPLEMENTAL ARGUMENT

A. **The Legislature Has Now Filled The "Gap" That Caused This Court To Create The *De Facto* Doctrine In *L.B.*, Which Should Now Be Limited To Its Facts.**

This Court should reverse the Court of Appeals decision reinstating the *de facto* parentage petition and hold that Michael cannot establish himself as a *de facto* parent of his former stepson, with all of the same rights and privileges as the child's only living parent, under the test set forth in ***Parentage of L.B.***, 155 Wn.2d

679, 122 P.3d 161 (2005), *cert. denied*, 547 U.S. 1143 (2006).²

This Court should confirm that under its decision in *Parentage of M.F.*, 168 Wn.2d 528, 534-35, ¶ 17, 228 P.3d 1270 (2010), and the recent amendments to the Uniform Parentage Act, a former stepparent cannot establish himself as a *de facto* parent regardless whether the child has one or two living parents.

In *L.B.*, this Court expressed concern that “[o]ur legislature has been conspicuously silent when it comes to the rights of children like *L.B.* who are born into nontraditional families.” 155 Wn.2d at 694, ¶ 21. But after amendments to the Uniform Parentage Act in 2011, a party is “presumed to be the parent of a child if, for the first two years of the child’s life, the person resided in the same household with the child and openly held out the child as

² This Court in *L.B.* set forth a stringent four-part test to establish standing as a “de facto” parent that requires the petitioner to show: 1) the natural or legal parent consented to and fostered the parent-like relationship; 2) the petitioner and child lived together in the same household; 3) the petitioner assumed obligations of parenthood without expectation of financial compensation; and 4) the petitioner has been in a parental role for a length of time sufficient to have established with the child a bonded, dependent relationship parental in nature. *Parentage of L.B.*, 155 Wn.2d 679, 708, ¶ 40, 122 P.3d 161 (2005).

his or her own.”³ RCW 26.26.116(2); *as amended by* Laws of 2011, ch. 283 § 8. This Court should recognize that the Legislature has filled the “gap” that caused this Court to establish the *de facto* parentage doctrine in *L.B.* and decline to further extend the doctrine past the specific facts of *L.B.*

This Court recognized in *M.F.* that the reasons for creating the common law *de facto* parentage cause of action in *L.B.* were not present where a former stepparent seeks a custodial or legal relationship with a former stepchild. 168 Wn.2d at 532, ¶¶ 9, 10. The *M.F.* Court noted that in *L.B.*, two women chose to form a family together but could not at that time have their status as legal parents established from the outset due to a lack of biological connection between the child and the *de facto* mother. 168 Wn.2d at 532, ¶¶ 9, 10. But this Court also recognized that parental status is usually, as here, established at birth, and by the time a stepparent enters the child’s life the child’s legal parents are already established under the statutory scheme. *M.F.*, 168 Wn.2d at 532, ¶ 9. This Court noted that “[t]hrough our statutory scheme

³ Michael neither lived in the same household with B.M.H. for the first two years of his life nor held B.M.H. out as his own child; Michael and Laurie married after B.M.H. was born and divorced when he was less than two years old. (See CP 19, 83)

does not permit a stepparent to petition for parental status, this does not equate to a lack of remedy. The legislature has provided a statutory remedy for a stepparent seeking a custodial relationship with a stepchild by enabling stepparents to petition for custody.” *M.F.*, 168 Wn.2d at 533, ¶ 14.

This Court should take the opportunity to once again hold that a former stepparent cannot establish himself as a *de facto* parent even if the child of a former spouse has only one living parent. The Legislature has recently confirmed that a stepparent cannot seek to establish a legal parental relationship with a child short of adoption or third party custody. Since this Court’s decisions in *L.B.* and *M.F.*, the Legislature has amended the Uniform Parentage Act to fill the statutory “gap” that this Court held was the basis for establishing the equitable doctrine of *de facto* parentage in *L.B.*, 155 Wn.2d at 688-89, ¶¶ 14, 15, creating a statutory avenue for a petitioner like the *de facto* mother in *L.B.* to establish herself as a legal parent. At the same time, the Legislature declined to create a similar statutory avenue for a former stepparent like Michael and the petitioner in *M.F.*

B. Even If The *De Facto* Parentage Doctrine Is Still A Viable Equitable Remedy, This Court Should Hold That Regardless Whether A Child Has One Or Two Living Parents, A Former Stepparent Cannot Seek To Establish Himself As A *De Facto* Parent.

Even if the *de facto* parentage doctrine is still viable after the Legislature's recent amendments to the UPA, this Court should confirm that under its decision in *Parentage of M.F.*, a former stepparent cannot establish himself as a *de facto* parent regardless whether a child has one or two living legal parents. There is nothing in this Court's decision in *M.F.* that ties its holding that prohibits a former stepparent from seeking status as a *de facto* parent to only when a child has two legal parents. And contrary to Division Two's reasoning, 165 Wn. App. at 375-76, ¶ 30, the courts cannot constitutionally provide less protection from state intervention to children with a single legal parent than to children with two legal parents.

A parent's right to the care, custody, and control of her child free from interference from third parties and the State is "the oldest of the fundamental liberty interests recognized." *Troxel v. Granville*, 530 U.S. 57, 65, 120 S.Ct. 2054 (2000). "[S]o long as a parent adequately cares for his or her children (*i.e.*, is fit), there will

normally be no reason for the State to inject itself into the private realm of the family to further question the ability of that parent to make the best decisions concerning the rearing of that parent's children." *Troxel*, 530 U.S. at 68-69; see also *Gomez v. Perez*, 409 U.S. 535, 538, 93 S.Ct. 872, 875 (1973) ("[O]nce a State posits a judicially enforceable right on behalf of children to needed support from their natural fathers there is no constitutionally sufficient justification for denying such an essential right to a child simply because its natural father has not married its mother.").

A parent is not entitled to less constitutional protection in making decisions for her family because she is a child's only legal parent.⁴ As the United States Supreme Court recognized in

⁴ The constitutional right to the custody and care of children has often been confirmed in cases where, as here, the child's other parent has died and a sole parent is resisting efforts by the state or third parties to interfere with the parent's decisions. See, e.g., *Troxel v. Granville*, 530 U.S. 57, 120 S.Ct. 2054 (2000) (single mother; father deceased); *Stanley v. Illinois*, 405 U.S. 645, 92 S. Ct. 1208, 1212, 31 L. Ed. 2d 551 (1972) (single father; mother deceased); *Custody of E.A.T.W.*, 168 Wn.2d 335, 227 P.3d 1284 (2010) (single father; mother deceased); *Custody of Shields*, 157 Wn.2d 126, 136 P.3d 117 (2006) (single mother; father deceased); *Custody of Nunn*, 103 Wn. App. 871, 14 P.3d 175 (2000) (single mother; father deceased), *abrogated on the issue of standing by Custody of Shields*, 157 Wn.2d at 138, ¶ 29.

Troxel,⁶ the rise in single-parent households is not an invitation to the courts to meddle in those families' lives. "[T]he United States Supreme Court does not limit the fundamental right to make decisions concerning the care, custody, and control of children to decisions made by *joint parents*: this Court's decisions have by now made plain beyond the need for multiple citation that a parent's desire for and right to the companionship, care, custody, and management of his or her children is an important interest that undeniably warrants deference and, absent a powerful countervailing interest, protection." *Wickham v. Byrne*, 199 Ill.2d 309, 317-18, 769 N.E.2d 1 (2002) (striking down Illinois' grandparent visitation statute as unconstitutional on its face after *Troxel*) (citing *Stanley v. Illinois*, 405 U.S. 645, 651, 92 S. Ct. 1208, 1212, 31 L. Ed. 2d 551 (1972) (*quotations omitted*) (*emphasis added*)).

There are many reasons why a child may only have one "existing, fit" parent. But whether an individual is a sole parent by

⁶ "While many children may have two married parents and grandparents who visit regularly, many other children are raised in single-parent households. In 1996, children living with only one parent accounted for 28 percent of all children under age 18 in the United States. U.S. Dept. of Commerce, Bureau of Census, Current Population Reports, 1997 Population Profile of the United States 27 (1998)". *Troxel*, 530 U.S. at 63-64.

choice or chance, she does not enjoy less protection from intrusion in her parenting decisions by third parties and the State than she would if her child has a second legal parent.

C. Adequate Cause For Third Party Custody Cannot Be Established Based Solely On A Parent's Relocation.

"[B]efore the courthouse doors will open to a third party petitioning for custody of a child," the nonparent petitioner must "submit an affidavit (1) declaring that the child is not in the physical custody of one of his or her parents *or* that neither parent is a suitable custodian *and* (2) alleging specific facts that, if true, will establish a prima facie case supporting the requested order." ***Custody of E.A.T.W.***, 168 Wn.2d 335, 346, ¶ 20, 227 P.3d 1284 (2010). "The facts supporting the requested custody order must show that the parent is unfit or that placing the child with the parent would result in actual detriment to the child's growth and development." ***E.A.T.W.***, 168 Wn.2d at 348, ¶ 24. *See also Custody of S.C.D-L*, 170 Wn.2d 513, 516, ¶ 7, 243 P.3d 918 (2010) (a third party custody petition that does not allege that a parent is not fit or an "unsuitable custodian" and simply implies it would be in the child's best interest to reside with a third party must be dismissed).

Here, Michael's petition did not allege, and it has never been alleged, that Laurie is not a fit parent, or that B.M.H.'s placement with Laurie would cause actual detriment to the child. (See CP 1-5) While Michael alleged that Laurie's plan to relocate with B.M.H. to Castle Rock would place B.M.H. in an "unstable situation" that was not in B.M.H.'s "best interests" (CP 3), Michael's proposed parenting plan, which he filed along with his petition for third party custody, conceded that B.M.H. should continue to reside primarily with Laurie – so long as she continued to reside in Clark County. (CP 7) Michael's third party petition was thus impermissibly based not on Laurie's ability to parent, but on her choice of residence. See RCW 26.09.540 (court may not restrict relocation of a child with his parent on the sole basis of the objection of a nonparent). And the only "harm" found by the trial court was based on impermissible speculation that Laurie *might* terminate contact between him and B.M.H. if she moved.⁶

⁶ The trial acknowledged that Laurie had not terminated any contact between Michael and B.M.H.: "[A]t this point Mr. Holt is still having contact with Benjamin, so it hasn't happened yet" (7/15 RP 21), and also recognized that whether the mother would attempt to terminate contact between Michael and B.M.H. was "speculative." (7/15 RP 24)

Despite the fact that any detriment to the child was wholly speculative, and based on the child's relocation with his mother, the trial court nevertheless allowed Michael's third party custody action to proceed, and subjected Laurie to a temporary order requiring B.M.H. to reside with Michael on specific dates and times over Laurie's objections. Speculation as to the mother's future actions and how those actions might affect B.M.H. is not a basis for the State to interfere with the mother's constitutional right to parent her child free from state interference. See e.g. ***Dependency of T.L.G.***, 139 Wn. App. 1, 17, ¶ 24, 156 P.3d 222 (2007) (the statute allowing the court to limit visitation during a dependency action must be based on "an actual risk [of harm], not speculation"); see also ***Marriage of Grigsby***, 112 Wn. App. 1, 16, 57 P.3d 1166 (2002) (trial court erroneously modified parenting plan to award primary care to father based on speculation that mother might attempt to relocate in future).

That the action was allowed to proceed is particularly ironic since being subjected to the emotional and financial cost of litigation might cause a parent to ultimately resist further fostering the relationship with a third party even if a parent is initially

supportive. Litigation provides no incentives for a single parent to foster a relationship between her child and a third party who is willing to take scorched earth tactics to force himself into a legal relationship with the child's parent.

Subjecting a family to domestic relations proceedings that are not necessary to protect a child from harm in itself is state intervention that is so disruptive of the parent-child relationship that the constitutional right of a custodial parent to make certain basic determinations for the child's welfare becomes implicated.

If a single parent struggling to raise a child is faced with visitation demands from a third party, the attorney's fees alone might destroy her hopes and plans for the child's future. Our system must confront more often the reality that litigation can itself be so disruptive that constitutional protection may be required; and I do not discount the possibility that in some instances the best interests of the child standard may provide insufficient protection to the parent-child relationship. We owe it to the Nation's domestic relations legal structure, however, to proceed with caution."

Troxel, 530 U.S. at 101 (*J. Souter, concurring*). This Court must also reverse the decision of the courts below finding adequate cause for Michael's third party custody action, which is directly contrary to this Court's decision in *E.A.T.W.*

D. This Court Should Award Attorney Fees To Petitioner.

This case is typical of the disputes that reach this Court in this arena, pitting an impecunious single mother against a well-heeled petitioner who presumes he can spend her into submission. As even the dissenters in *Troxel* recognized, "if a single parent who is struggling to raise a child is faced with visitation demand from a third party, the attorney's fees alone might destroy her hopes and plans for the child's future." 530 U.S. at 101 (*J. Kennedy, dissenting*).

This Court, "after considering the financial resources of all parties," has authority to "order [petitioner] to pay a reasonable amount for the cost to the other party of maintaining or defending any proceeding under this chapter." RCW 26.10.080; *Custody of Nunn*, 103 Wn. App. 871, 889, 14 P.3d 175 (2000) (awarding attorney fees to mother forced to defend third party custody action by paternal aunt whose legal expenses were funded by a trust established for the child by his deceased father). Respondent has far more income and resources than petitioner, who did not invite this dispute and should not be forced to bear its cost. Because there is no factual basis or legal basis for respondent's demand for

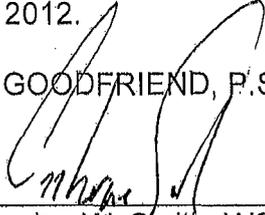
custody of the mother's son, he should be required to pay the attorney fees she has incurred.

III. CONCLUSION

The Legislature has now filled the "gap" that caused this Court to create the *de facto* parentage doctrine in *L.B.* which should now be limited to its facts. Even if the *de facto* parentage doctrine is still a viable equitable remedy, this Court should hold that regardless whether a child has one or two living parents, a former stepparent cannot seek to establish himself as a *de facto* parent. This Court should also hold that adequate cause for third party custody action cannot be established based solely on a parent's relocation, and speculation that the parent consequently might terminate contact between her child and the petitioning third party. This Court should dismiss both the *de facto* parentage and third party custody petitions and award attorney fees to the mother.

Dated this 30th day of July, 2012.

SMITH GOODFRIEND, P.S.

By: 

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DECLARATION OF SERVICE

The undersigned declares under penalty of perjury, under the laws of the State of Washington, that the following is true and correct:

That on July 30, 2012, I arranged for service of the foregoing Supplemental Brief of Petitioner, to the court and to the parties to this action as follows:

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Attached for filing in .pdf format is the Supplemental Brief of Petitioner in *Custody of: B.M.H. - Michael J. Holt and Laurie L. Holt*, Supreme Court Cause No. 86895-6. The attorney filing this document is Catherine W. Smith, WSBA No. 9542, e-mail address: cate@washingtonappeals.com

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