

66104-3

66104-3

No. 66104-3-I

COURT OF APPEALS, DIVISION I  
OF THE STATE OF WASHINGTON

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In re the Marriage of:

Yvette Connor (f/k/a Bettati), Respondent

and

Arthur Bettati, Appellant

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BRIEF OF RESPONDENT

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Attorney for Respondent

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**APPENDIX**

- A. Certified Copy of January 23, 2008 Sacramento, California Superior Court Ruling.

## 1. INTRODUCTION

Appellant, Arthur Bettati, appeals from the denial of his motion to remove this case to California.

Child custody issues were ordered to be resolved in California in accordance with the Uniform Child Custody Jurisdiction and Enforcement Act.<sup>1</sup> California, however, declined Arthur's effort to have California exercise *in personam* jurisdiction over petitioner and the parties' marital property issues.<sup>2</sup> The property issues were decided in Washington based upon Yvette's<sup>3</sup> Petition in Washington and, ultimately, the agreement of the parties.

Arthur argues Washington no longer has jurisdiction over the enforcement of the resolution of those property issues because the parties no longer reside in Washington. Arthur, therefore, asks this Court to reverse the denial of his motion to remove future property enforcement proceedings, if any, to California despite respondent's objection and the

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<sup>1</sup> RCW 26.27.011 *et. seq.* ("UCCJEA").

<sup>2</sup> CP 125-28. A certified copy of this California Court Order should have been included in the Designation of Clerk's Papers as part of the Declaration at CP 33. It is a part of that document in the Court file. It accompanies this Brief as Appendix A.

<sup>3</sup> First names of the parties are used only for clarity.

decision by the California Court that it would not exercise jurisdiction over the property issues in this case.<sup>4</sup>

Respondent, Yvette Connor (formerly Bettati), maintains that: (1) the parties ultimately agreed Washington had jurisdiction to address and resolve all of their property issues; (2) Washington resolved those issues; (3) In the process, Arthur sought independent relief from the Washington Courts; (4) Arthur, therefore, waived any lack of *in personam* jurisdiction claim; (5) the Washington Court continues to have jurisdiction to enforce its orders; (6) Arthur has not established that the California Court will accept jurisdiction over the property issues in this case;<sup>5</sup> and (7) Arthur has not established that the trial Court abused its discretion when it denied his motion to change venue of this action to California and denied his related motion for reconsideration.

Arthur's argument that remaining property issues should be resolved in California also misses the point. The issue is whether the Washington Court abused its discretion by asserting its continuing jurisdiction to enforce its orders, not whether California might also have jurisdiction, if it chose to exercise it.

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<sup>4</sup> Possible remaining property issues include a credit card responsibility dispute, transferring title to automobiles, responsibility for settlement payments between the parties, mortgage loan payment responsibility, etc.

<sup>5</sup> There is no evidence that Yvette, who now lives in Colorado, now has any greater contact with California than she had when she lived in Washington. No one is asking that this matter be transferred to Colorado.

In addition, and put charitably, Arthur is a difficult personality and has exhibited bizarre behavior. CP 25-26; 121-123; 133; 357-63; 437-44. This in part caused Yvette to obtain a restraining order against Arthur at the onset of her divorce proceedings. CP 353; 467-88.

Finally, Yvette objects to portions of Arthur's Brief of Appellant—which is the subject of her pending Motion.

## **2. STANDARD OF REVIEW—ABUSE OF DISCRETION**

**A. Denial of a Motion for Change of Venue.** Abuse of discretion is the standard of review for change of venue motion appeals. *State v. Clark*, 143 Wn.2d 731, 756, 24 P.3d 1006 (2001). “A trial court abuses its discretion if its decision is manifestly unreasonable or based on untenable grounds or untenable reasons.” *In re Marriage of Littlefield*, 133 Wn.2d 39, 46-47, 940 P.2d 1362 (1997). *See generally In re Marriage of Farmer*, 83960-3 (\_\_\_ Wn.2d \_\_\_, filed September 8, 2011).

**B. Denial of a Motion for Reconsideration.** Abuse of discretion is also the standard of review for a denial of a motion for reconsideration. *Kleyer v. Harborview Medical Center of University of Washington*, 76 Wn.App. 542, 545, 887 P.2d 468 (1995).

**C. Denial of a Motion for Change of Venue on *Forum non Conveniens* Grounds.** The standard of review for a dismissal on the

ground of *forum non conveniens* is abuse of discretion. *Myers v. Boeing Co.*, 115 Wn.2d 123, 128, 794 P.2d 1272 (1990).

### 3. COUNTER-STATEMENT OF THE CASE

On October 3, 2007, Yvette filed this dissolution action in Washington State after moving from California to Washington. CP 105. Her Ex Parte Restraining Order/Order to Show Cause was entered the same day for a hearing on October 18, 2007. CP 353. Arthur was served the same day. CP 404. Among other things the Restraining Order sought protection from Arthur—the basis of which is explained at CP 357-63.

Unknown until after she filed in Washington, Arthur had secretly filed a July 22, 2007 Petition for Legal Separation in California, (CP 513), which was not served on her until October 30, 2007, CP 118, after she served her show cause motion on Arthur. CP 404.

On about October 23, 2007, Arthur moved to dismiss the Washington case “for lack of jurisdiction” under the UCCJEA because Washington was not the “home state” of the parties’ child. CP 58; 61. This motion was entirely directed to jurisdiction under RCW 26.27 and not to the exercise of property-related personal jurisdictional issues.<sup>6</sup>

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<sup>6</sup> Yvette opposed this motion. See CP 437. It was not until Arthur filed his Response to the Petition that he first started to make general objections to Washington’s exercise of *in*

Indeed, the evidence was that Arthur had minimum contacts with this state and that Washington had personal jurisdiction over him because, for example, he entered into a lease for an apartment on Mercer Island CP 67, 75, he obtained a Washington Drivers License CP 73, and he registered to vote in Washington. CP 92-97.

Arthur consented to Washington jurisdiction by, for example, unconditionally seeking relief in his motion to transfer parenting issues to California, CP 58, and agreeing to a Temporary Order in the case. CP 99.

The Temporary Order with restraint provisions was entered November 1, 2007. CP 99.<sup>7</sup> It was in part based on Arthur's hostile attitude toward Yvette, his temper, his controlling behavior and the affect of his behavior on the parties' child.<sup>8</sup> CP 102.

Arthur moved to reconsider this Order with no reference to any dispute over personal jurisdiction. CP 446. The motion was denied. CP 500.

Ultimately, Arthur's motion to, in effect, bifurcate the issues by moving parenting issues to California was granted by Judge Theresa

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*personam* jurisdiction. CP 504. *See, e.g.*, Arthur's jurisdictional objections only to parenting issues: CP 365; 378.

<sup>7</sup> Arthur's attorney "approved" the Order and did not reserve any personal jurisdiction objection.

<sup>8</sup> *See generally* CP 467-88. The Court only allowed Arthur to have supervised visitation with his child. CP 102.

Doyle on December 6, 2007. CP 525. Resolution of property issues remained in Washington.

On January 23, 2008, California specifically declined to accept *in personam* jurisdiction over Yvette. CP 125-28. Arthur did not appeal from this decision or his related reconsideration motion. CP 144-45.

On February 22, 2008, Arthur was sanctioned for not having timely responded to Yvette's Petition. CP 503. In his Response of the same date, he denied the Washington Court has jurisdiction over the marriage and Arthur "because the respondent [Arthur] resides in the state of California." CP 506. Despite this allegation, Arthur still asked the Court to:

- Enter a decree
- Provide reasonable maintenance for the husband
- Dispose of property and liabilities
- Change name of wife to Yvette K. DeLucia . . .
- Award the tax exemption for the dependent children as follows: To the mother until such time as the father is fully employed at which time they will alternate
- Order payment of attorney's fees, other professional fees and costs. CP 506-07.

On August 10, 2008, Arthur moved to transfer all matters still pending in Washington State to California, CP 1, in part because Yvette had since moved to Colorado. CP 8. On August 16, 2008 the Court granted Arthur's motion and awarded attorney fees in an amount to be later determined. CP 16; 18.

In effect, Arthur's motion asked the Washington Court to order the California Courts to assume *in personam* jurisdiction over Yvette. CP 166-72.<sup>9</sup> No authority was offered by Arthur to indicate a Washington Court has the power to order the California Court to assume *in personam* jurisdiction over Yvette despite its earlier refusal to do so. *See generally* CP 20-22.

Therefore, on August 25, Yvette moved for reconsideration of the August 16 Order. CP 20-28. In her motion, she asked that the motion to transfer this matter to California be dismissed, with prejudice, for the reason that the Washington Court could not tell the California court what to do. *See, e.g.*, CP 166-75.

Yvette's motion for reconsideration was granted on September 10, 2010, and the related award of attorney fees was vacated. CP 174.

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<sup>9</sup> Arthur denied this is what he was asking the Court to do. CP 11. Yet, he was either asking the Washington Court to order California to assume personal jurisdiction over Yvette or, he was asking Washington to send the case to California in the hope it would exercise personal jurisdiction over Yvette. Yvette does not consent to personal jurisdiction over her in California, CP 25; 117, and there is no evidence California will accept it. If it did not do so, and Washington declined jurisdiction, the case would be in legal limbo—neither in Washington nor California.

Arthur appealed this Order on October 5, 2010. CP 176.

On September 25, 2008, the Washington Court entered Findings of Fact and Conclusions of Law and a Decree of Dissolution in this matter concerning property issues and marriage status. CP 530; 568. It reserved ruling on an Order of Child Support pending further parenting issues to be decided in California. CP 570. Entry of the Findings, Conclusions and Decree were “Approved” by Arthur’s attorney without any stated reservations. CP 534, 570. This was done despite having previously objected to entry of final orders until all issues raised by Yvette’s Petition were resolved. CP 510-11.

#### 4. ARGUMENT

**A. Introduction.** Child support and property disposition both require personal jurisdiction over the affected persons. *In re Marriage of Tsarbopoulos*, 125 Wn.App. 273, 284, 104 P.3d 692 (2004); *In re Marriage of Peck*, 82 Wn.App. 809, 815-18, 920 P.2d 236 (1996).

Here both parties resided in Washington as shown by Yvette’s agreement and Arthur’s drivers license, voter registration, etc. Alternately, Yvette resided in Washington and Arthur independently consented to have his property and divorce issues resolved in Washington.

For much of the case, Arthur consented to Washington having personal jurisdiction over him and the consequences of his decision.

On appeal, Arthur is bound by the record below and he is required to demonstrate that the trial court abused its discretion when it denied his motions to transfer this case to California. Arthur has failed to demonstrate any abuse of discretion by the trial court.

**B. California Declined to Exercise *In Personam* Jurisdiction Over Yvette.** Try as he might to argue that the property aspects of this case should be transferred to California, Arthur cannot erase the fact that he tried to convince the California Court to accept *in personam* jurisdiction over Yvette in this case and related property issues, but California refused. (CP 126; Appendix A).<sup>10</sup> He did not appeal this decision (or the denial of his related motion for reconsideration) and is bound by it. *See generally* CP 33-49;<sup>11</sup> 142-64, especially 144-46 concerning California law about appeal issues.

Arthur has provided nothing in the record to indicate California will change its mind or is prepared to assert personal jurisdiction over Yvette.

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<sup>10</sup> The California Court granted Yvette's motion to "abate" Arthur's California divorce Petition, in favor of the Washington action, and her motion to "quash" the Summons because California lacked personal jurisdiction over her. CP 126.

<sup>11</sup> The missing Exhibit A to this document is in Appendix A.

**C. The Washington Court has Continuing Jurisdiction to Enforce its Orders.** Under the “doctrine of continuing jurisdiction,” a Washington court has continuing jurisdiction to clarify or enforce its own Decree. *See, e.g., Heuchan v. Heuchan*, 38 Wn.2d 207, 213-14, 228 P.2d 470 (1951) (the power to modify is not lost because a party is no longer a state resident); *State v. Superior Court for King County*, 78 Wash. 372, 374, 139 Pac. 42 (1914).<sup>12</sup> This is consistent with the Conflict of Law Restatement provision that:

“If a state obtains judicial jurisdiction over a party to an action, the jurisdiction continues throughout all subsequent proceedings which arise out of the original cause of action.  
...”<sup>13</sup>

The fact that petitioner has moved to another state is irrelevant. Washington is the state that exercised original jurisdiction and Washington is apparently the only state where both parties have (or had) attorneys who are familiar with the property-related facts of this case.

Every Court has the continuing power to enforce its judgments. RCW 2.28.010, .150. When a Court acting within its jurisdiction makes and enters a judgment or decree, it has power to enforce its executory parts even though it has become “final.” This is because an action in which a judgment or decree has been entered is deemed to be pending if it

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<sup>12</sup> *See also* RCW 26.09.170 concerning the continuing authority of a court to modify its Decree.

<sup>13</sup> RESTATEMENT (SECOND) OF CONFLICT OF LAWS § 26 (1988)

becomes necessary for a Court to resolve a controversy or enforce its judgment or decree. *Goodsell v. Goodsell*, 38 Wn.2d 135, 138, 228 P.2d 155. (1951) (property division); *State ex rel. Greenberger v. Superior Court*, 134 Wash. 400, 401, 235 P. 957 (1925). This tends to prevent unseemly, expensive, and dangerous conflicts of jurisdiction and process. *Sherwin v. Arveson*, 96 Wn.2d 77, 80, 633 P.2d 1335 (1981).

Arthur does not cite contrary authority.

**D. Arthur's Motion for Change of Venue Was Properly Denied.** Arthur moved for "change of venue" of the post-Decree property issues in this case from Washington State to California. His motion was ultimately denied.

A motion for change of venue is more common in a criminal context where trial in another *county* is sought because there are, for example, claims of a due process violation because of prejudicial pre-trial publicity. *See, e.g., State v. Crudup*, 11 Wn.App. 583, 524 P.2d 479 (1974). *See also Geroux v. Fleck*, 33 Wn.App. 424, 428, 655 P.2d 254 (1982).

Respondent did not expressly support his transfer motion as one based on *forum non conveniens*,<sup>14</sup> which refers to the inherently discretionary power of a court to decline jurisdiction when the

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<sup>14</sup> CP 1, 3.

convenience of the parties and the ends of justice would be better served if the action were brought and tried in another forum. *Johnson v. Spider Staging Co.*, 87 Wn.2d 577, 579, 555 P.2d 997 (1976).

To the extent he may be viewed as having asserted a *forum non conveniens* motion, his effort was casual at best. It certainly lacked any authoritative guidance about how the Court should address this issue—other than the way it did—by denying it. In addition, other than by now making the bare claim of witness inconvenience, Arthur has not explained what witnesses are inconvenienced by venue in Washington State, other than himself, after he consented to venue in Washington State.

*Forum non conveniens* factors are generally irrelevant to post-Decree proceedings and presumably include whether the proposed alternate forum has previously rejected jurisdiction over the case.<sup>15</sup> Moreover, respondent offered no persuasive evidence that the forum chosen by petitioner should be disturbed and that the case should be sent to a forum where he is without legal representation.

In addition, application of the doctrine of *forum non conveniens* assumes the existence of an adequate alternate forum. Arthur has not established that California would reverse its prior decision to decline to

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<sup>15</sup> Cases like *In re Marriage of Morrison*, 26 Wn.App. 571, 613 P.2d 557 (1980) determined it was not error to decline jurisdiction because of insubstantial contact in Washington. It did not hold the Court was required to do so and it would have been an abuse of discretion if it had not declined jurisdiction.

exercise jurisdiction over Yvette. *See, e.g., Myers v. Boeing Co.*, 115 Wn.2d 123, 128, 794 P.2d 1272 (1990); *Hill v. Jawanda Transport Ltd.*, 96 Wn.App. 537, 541, 983 P.2d 666 (1999).

**E. Arthur Waived any Personal Jurisdiction Objections He May Have Had By Seeking Affirmative Relief From the Washington Court.** Even where a party has objected to personal jurisdiction under CR 12(b), or otherwise, that party may waive the defense of lack of jurisdiction by seeking affirmative relief, thereby invoking the jurisdiction of the Court. *Livingston v. Livingston*, 43 Wn.App. 669, 671, 719 P.2d 166 (1986).<sup>16</sup>

Arthur waived his *in personam* jurisdiction objection by, for example, seeking the transfer of parenting issues to California without preserving a broader *in personam* jurisdiction objection. CP 58. Further, he made several other motions and requests for relief, including in his Response to the Petition, without preserving his jurisdictional objection. CP 99, 506-07.

## 5. CONCLUSION

At page 16 of his Brief Arthur broadly claims “the ends of justice would be better served if all remaining issues in this case were either

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<sup>16</sup> CR 12(g) and (h) provide other ways where waiver may also be found.

declined and vacated<sup>17</sup> by the State of Washington, or transferred (as originally ordered by the Court)<sup>18</sup> to the State of California Court for ongoing adjudication.” This is no doubt his opinion. It is not persuasive as to whether the trial Court *abused its discretion* when it disagreed with him.<sup>19</sup>

Arthur has the burden of proof to show an abuse of discretion for this appeal. He has failed to do so.

Even though the Court might have been justified in ruling either way on Arthur’s jurisdiction motion, the decision to retain jurisdiction was reasonable because of, for example, the history of the case and financial considerations. Both parties had agreed Washington could decide their property issues. Yvette had a significant investment in the experience and knowledge of her attorney in Washington (as did Arthur in his former attorney). This would be lost if the Court had granted Arthur’s motion.

Given the facts and history of this case, Arthur has failed to support the unusual proposition that a Washington Court has the power to order a California Court to assume *in personam* jurisdiction over petitioner despite

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<sup>17</sup> Arthur fails to support his argument that future issues should be “declined and vacated.”

<sup>18</sup> This Order was reversed and is a subject of this appeal.

<sup>19</sup> In the same reference he claims he cannot financially support the litigation in Washington. He might have thought of this before he consented to in personal jurisdiction in Washington. In any event, this is not persuasive when it comes to arguing the Washington Court abused its discretion when it denied Arthur’s motion to transfer the case to California.

its previous refusal to do so. Similarly, he has failed to show that the Court abused its discretion in refusing to remove the property issues in this case to California.

Therefore, the Court should be affirmed and Arthur's appeal denied.

DATED: September 12, 2011.

Respectfully submitted,

CAMDEN HALL, PLLC

A handwritten signature in black ink, appearing to read "Camden M. Hall". The signature is written in a cursive, flowing style.

Camden M. Hall, WSBA No. 146  
Attorney for Respondent

1001 Fourth Avenue, Suite 3312-13  
Seattle, WA 98154  
(206)749-0200

**DECLARATION OF SERVICE**

I declare under penalty of perjury under the laws of the state of Washington, that by the end of the day on September 12, 2011, I will have served, or had served, this Respondent's Brief and Declaration of Service upon the following individuals in the manner indicated below:

Arthur J. Bettati, Jr.  
8510 Rolling Green Way  
Fair Oaks, CA 95628-6230

Via Federal Express

DATED: September 12, 2011 at Seattle, Washington.

  
\_\_\_\_\_  
Michael A. Overlie

# **APPENDIX A**



The annexed instrument is a correct copy of the original on file in my office.

Attest: 8-10-10

Certified  
Superior Court of Sacramento  
County of Sacramento

By [Signature] Deputy

STATE OF WASHINGTON } ss.  
County of King

I, BARBARA MINER, Clerk of the Superior Court of the State of Washington, for the County of King, do hereby certify that I have compared the foregoing copy with the original instrument as the same appears on file and of record in my office, and that the same is a true and perfect transcript of said original and of the whole thereof. IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the Seal of said Superior Court at my office at Seattle this \_\_\_\_\_

day of NOV 08 2007

20  
BARBARA MINER, Superior Court Clerk  
By [Signature] Deputy Clerk

SACRAMENTO SUPERIOR COURT  
IN AND FOR THE COUNTY OF SACRAMENTO

FILED ENDORSED  
JAN 28 2008  
BY A. Bell  
DEPUTY CLERK

DATE & TIME: January 23, 2008 9:00 am  
JUDGE : Eugene Balonon  
REPORTER : Present

DEPT. NO. : 123  
CLERK : A. Bell  
BAILIFF : Present

07FL04448

BETTATI, Arthur J. Jr. (Petitioner)  
vs.  
BETTATI, Yvette (Respondent)

Trenkle, Michael  
Keely, Charlotte

NATURE OF PROCEEDINGS:

COURT'S RULING (Page 1 of 2):

Counsel for the parties submitted briefs and argued the matter. The Court took the issues under submission. Respondent has made a special appearance and the issues before the Court are Respondent's: (1) motion to abate Petitioner's Petition for Legal Separation in favor of her Petition for Dissolution filed in the State of Washington; (2) motion to quash because California lacks personal jurisdiction over Respondent; (3) motion to dismiss for lack of subject matter jurisdiction under the UCCJA or in the alternative that California decline jurisdiction and transfer the custody/visitation action to Washington based upon a finding of *forum non-conveniens*.

Respondent requests a "Statement of Decision pursuant to Code of Civil Procedure section 632" and a "statement of reasons pursuant to Family Code section 3048(A)(1)." The provisions of section 632 of the Code of Civil Procedure apply to "...the trial of a question of fact by the court...". This is a law and motion proceeding, thus the section is inapplicable. The provisions of section 3048 of the Family Code are also inapplicable because this is not a proceeding to "determine child custody or visitation" but rather is one in which the Court is determining jurisdiction of the pending issues. (Emphasis added.)

The Court GRANTS Respondent's request for an order of abatement and motion to quash. The Court is not persuaded by the evidence presented that Respondent engaged in trickery or fraud and is somehow estopped or should be precluded from abating the action or moving to quash the summons. Moreover, it is undisputed that Respondent filed and served her petition prior to Petitioner and that she was served by Petitioner in Washington. Apparently, Petitioner has made a general appearance in Washington only moving to dismiss the custody issue. (Respondent's Notice of Motion; Exhibit B.)

As to the custody issue, the provisions of section 3421(a)(1) of the Family Code are in the alternative, therefore, California is the home state of the parties' four-year old daughter because California was her home state on the date of the commencement of the proceedings. The proceedings were commenced in California on June 22, 2007, the date on which Petitioner filed his Petition for Legal Separation. (Family Code section 3402(e) and (g).)

Consequently, the remaining question is whether this Court should decline jurisdiction pursuant to section 3427 of the Family Code based upon "inconvenient forum." The relevant factors are contained with subsection (b) of section 3427 and need not be restated here. The Court has considered each relevant factor under the section. Respondent's brief and oral argument relies heavily upon subdivision (6), "The nature and location of the evidence required to resolve the pending litigation, including testimony of the child."

BOOK: 123  
PAGE:  
DATE: January 23, 2008  
CASE NO.: 07FL04448  
CASE TITLE: IN RE MARRIAGE OF BETTATI

BY: A. Bell  
Deputy Clerk

SACRAMENTO SUPERIOR COURT  
IN AND FOR THE COUNTY OF SACRAMENTO

DATE & TIME: January 23, 2008 9:00 am  
JUDGE : Eugene Balonon  
REPORTER : Present

DEPT. NO.: 123  
CLERK : A. Bell  
BAILIFF : Present

BETTATI, Arthur J. Jr. (Petitioner)  
vs.  
BETTATI, Yvette (Respondent)

TRENKLE, Michael A.  
KEELY, Charlote L.

NATURE OF PROCEEDINGS:

COURT'S RULING (Continued, Page 2 of 2):

The child has resided in Washington since July 7, 2007. Prior to that date she had resided in California since birth. Petitioner is presently in California having not returned to Washington after he was served with Respondent's dissolution petition on October 3, 2007. The child has remained in Washington in part because that jurisdiction issued a temporary restraining order and later by a November 30, 2007 stipulation, pending further orders or agreement.

The child is currently attending preschool, receiving therapy and has social contacts in Washington. However, other than the last seven months, the child resided in California. Consequently it is reasonable to conclude that the weight of the evidence relative to the child is within California.

Although the evidence concerning the child's adjustment, therapy, contacts and school over the last seven months are certainly pertinent to the issues of custody and visitation, this alone is not determinative. The testimony from Washington witnesses and certain documentary evidence may be offered pursuant to section 3411 of the Family Code, thus limiting the inconvenience to all concerned.

Therefore, at this time the Court DENIES Respondent's motion concerning custody jurisdiction. California is the home state of the child pursuant to the UCCJEA and California Family Code and it is not an inconvenient forum.

However, this ruling is without prejudice. As the proceedings and evidence in Washington develop, this Court may later decline jurisdiction over custody because of *forum non-conveniens* "... upon motion of a party, the court's own motion, or request of another court." (Family Code section 3427(a).)

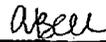
Respondent is ordered to file a copy of this Court's ruling with the Washington court having jurisdiction over the pending dissolution.

Dated: January 28, 2008

  
Eugene L. Balonon  
Superior Court Judge

BOOK: 123  
PAGE:  
DATE: January 23, 2008  
CASE NO.: 07FL04448  
CASE TITLE: IN RE MARRIAGE OF BETTATI

SACRAMENTO SUPERIOR COURT

BY:   
Deputy Clerk



The annexed instrument is a correct copy of the original on file in my office.

Attest: 8-10-10

Certified  
Superior Court of Sacramento  
County of Sacramento

By [Signature]  
Clerk Deputy