

FILED
SUPREME COURT
STATE OF WASHINGTON
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Supreme Court No. 95327-9

Court of Appeals No. 50360-3-II

SUPREME COURT OF THE STATE OF WASHINGTON

In Re the Matter of the Marriage of

RALUCA VETRICI,

Respondent,

v.

GRIGORE VETRICI,

Petitioner.

**PETITIONER'S MOTION TO FURTHER AMEND THE
COMBINED REPLY TO RESPONDENT'S COMBINED ANSWER**

**Grigore Vetrici, pro se
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MOVING PARTY AND

This motion to further amend the combined reply is brought by Petitioner Grigore Vetrici.

REQUESTED RELIEF

Petitioner respectfully requests to further amend the combined reply.

FACTS RELEVANT TO MOTION

The combined answer to the petition for review and the motion for extension of time, the Respondent introduces the issue of jurisdiction under the UCCJEA.

In his prior amendment, Petitioner referenced *In re Custody of A.C.*, 165 Wn.2d 568, 200 P.3d 689 (2009), a decision of this Court, then addressed application to the instant case of two conflicting Court of Appeals decisions without also providing the background, the holding and the application of *A.C.* to the instant case.

GROUND FOR RELIEF

RAP 13.4 addresses grounds for review by this Court, and in particular, those cases which conflict with the decisions of this Court. *A.C.* directly conflicts with the Court of Appeals' decision or Respondent's answer to the petition for review and is triggered by it. Although Petitioner's argument in the previously-amended combined reply

indirectly arrives at the same conclusion as *A.C.* and while the amending information could be included in a supplementary brief if the instant case were to be accepted by the Court, it is worthy of the Court's attention in reviewing the petition due to RAP 13.4.

If an authority bears upon a case, an attorney bears a responsibility to the Court to bring that authority to the Court's attention even if the holding is adverse to his client's case. While Petitioner is not an attorney, Respondent's attorney should have addressed the case as he brought up the issue of jurisdiction under the UCCJEA.

This case seeks to enforce a decree alleged to have been violated through the inequitable misrepresentation of a document representing a former separation agreement terminated by the decree. This inequity mitigates against construction of the rules or other legal principles in a way that would refuse the granting of this amendment.

For the reasons stated above, Petitioner respectfully requests this Court grant the motion to further amend.

Respectfully submitted this 9th day of April, 2018.

s/ Grigore Vetrici
Petitioner, Pro Se

GRIGORE VETRICI - FILING PRO SE

April 09, 2018 - 10:00 AM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 95327-9
Appellate Court Case Title: In re the Marriage of: Raluca Vetrić and Grigore Vetrić
Superior Court Case Number: 10-3-00585-5

The following documents have been uploaded:

- 953279_Answer_Reply_20180409095541SC290687_5119.pdf
This File Contains:
Answer/Reply - Reply to Answer to Petition for Review
The Original File Name was Second Amended Reply to Combined Answer and Response.pdf
- 953279_Motion_20180409095541SC290687_8058.pdf
This File Contains:
Motion 1 - Amended Brief
The Original File Name was Motion to further amend.pdf

A copy of the uploaded files will be sent to:

- dpm@lifetime.legal
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Comments:

Motion (Amended Brief) is motion to amend reply to combined answer to petition for review and motion for extension of time

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