

No. 65317-2-I

COURT OF APPEALS, DIVISION ONE
OF THE STATE OF WASHINGTON

JOHN EDWARD PENNINGTON, Respondent

v.

ANNE LAUGHLIN PENNINGTON, Appellant

REPLY BRIEF OF APPELLANT

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DIVISION ONE
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TABLE OF CONTENTS

- I. Joint Decision-Making8
 - A. There Is No Statutory Provision That Authorizes Imposition Of Joint Decision-Making Based On the Interests Of The Child.....8
 - B. RCW 26.09.191(1): The Failure To Find Willful Abandonment for An Extended Period of Time or a Substantial Refusal to Perform Parenting Functions, Is Reviewable on Appeal.....9
 - C. Ms. Laughlin’s Argument As to Why Opposition To Joint Decision-Making Authority Was Reasonable Is Not Nonsensical.....10
 - 1. Ms. Laughlin’s Credibility Regarding Domestic Violence Has No Bearing On The Reasonableness Of Her Opposition.....10
 - 2. The Connection Between Mr. Pennington’s Lack of Credibility: His Propensity to Manipulate People by Distorting and Misrepresenting Information: The Likelihood of Parental Conflict If Decisions Must Be Made Jointly.....11
 - 3. Ms. Laughlin Fulfilled the Statutory Criteria Under RCW 26.09.187(2) For Determining the Reasonableness of Her Objection to Joint Decision Making.....15
 - a. Whether the court finds limitations under RCW 26.09.191.....16
 - b. Whether there is a history of participation in parenting functions.....17

| | | |
|------|---|----|
| c. | Whether there is a demonstrated ability to cooperate as to child rearing issues referenced in other statutes..... | 17 |
| D. | The Absence of Language in RCW 26.09.184(4)(a) That Expressly Authorizes The Court To Impose Joint Decision Making Authority On Issues Other Than Education, Religion and Health Care Means That Trial Courts Do Not Have The Authority To Do So..... | 18 |
| II. | The Name Change Issue..... | 19 |
| A. | Ms. Laughlin Did Not Place The Issue Before The Court and Did Not Invite Error..... | 19 |
| B. | The Cases Which Hold the Court Has No Authority Under RCW 26.09 to Impose A Name Change Still Control..... | 21 |
| C. | There was No Evidence As To Why A Name Change From Pennington Laughlin to Laughlin Pennington Is In Katelin’s Best Interest..... | 22 |
| III. | Property Division..... | 23 |
| A. | A Finding That The Division of Property Is Fair And Equitable Is A Conclusion Of Law Subject to De Novo Review..... | 23 |
| B. | Failure to Assign Error to a Finding Is Reviewable..... | 23 |
| C. | The Issue Framed By The Pleadings: Not Whether Ms. Laughlin Should Be Compensated For Improvements Made To His Home But Rather, By How Much..... | 24 |
| D. | The Court Made No Findings As To Property Values..... | 25 |
| E. | The Tax Refunds Were Not Divided Between The Parties..... | 25 |

| | | |
|-----|-------------------------------|----|
| IV. | Child Support..... | 26 |
| V. | Attorneys Fees and Costs..... | 27 |
| VI. | Publishing This Decision..... | 29 |

TABLE OF AUTHORITIES

Table of Cases

| | |
|---|------------|
| <i>Daves v. Nastos</i> , 105 Wn.2d 24, 711 P.2d 314 (1985)..... | 21, 23 |
| <i>In re Dependency of K.R.</i> 128 Wn.2d 129, 147, 904 P.2d 1132 (1995)..... | 20 |
| <i>In re Detention of Martin</i> , 63 Wn.2d 501 at 510, 182 P.3d 951 (2008)..... | 19 |
| <i>In re the Marriage of Brady</i> , 50 Wn. App. 728 at 730, 750 P. 2d 654 (1988)..... | 23 |
| <i>In re the Marriage of Burrill</i> , 113 Wn. App. 863 at 873, 56 P.3d 993 (2002)..... | 28 |
| <i>In re the Marriage of Dalthorp</i> , 23 Wn. App. 904 at 913, 598 P.2d 788 (1970)..... | 28 |
| <i>In re the Marriage of Hurta</i> , 25 Wn App 95, 605 P.2d 1278 (1979)..... | 21, 23, 29 |
| <i>In re the Marriage of Possinger</i> , 105 Wn. App. 326, 19 P.3d 1109 (2001)..... | 8 |
| <i>Mayo v. Mayo</i> , 75 Wn.2d 36 at 39, 448 P.2d 926 (1968)..... | 25 |
| <i>State v. Johnson</i> , 119 Wn.2d 167, P.2d 1082 (1992)..... | 18 |
| <i>State v. Wood</i> , 89 Wn.2d 97, 569 P.2d 1148 (1977)..... | 18 |
| <i>In re the Welfare of LNB-L</i> , 156 Wn. App. 591, 234 P.3d 311 (2010)..... | 23 |

| | |
|---|----|
| <i>Wold v. Wold</i> , 7 Wn. App. 872, 503 P.2d 118 (1972)..... | 25 |
|---|----|

Constitutional Provisions

Not applicable

Statutes

| | |
|-------------------------------|----------|
| RCW 4.24.130(1)..... | 21 |
| RCW 4.24.130(a)..... | 21 |
| RCW 26.09..... | 21, 29 |
| RCW 26.09.002..... | 8, 16 |
| RCW 26.09.080..... | 23 |
| RCW 26.09.184(1)(d)..... | 8 |
| RCW 26.09.184(e)..... | 16 |
| RCW 26.09.184(2)..... | 29 |
| RCW 26.09.184(4)..... | 8 |
| RCW 26.09.184(4)(a)..... | 18, 19 |
| RCW 26.09.187..... | 8, 16 |
| RCW 26.09.187(2)..... | 8, 9, 15 |
| RCW 26.09.187(2)(b)(iii)..... | 16 |
| RCW 26.09.187(2)(c)..... | 16 |

| | |
|------------------------------|----------|
| RCW 26.09.187(2)(c)(iv)..... | 18 |
| RCW 26.09.191..... | 8, 9, 16 |
| RCW 26.09.191(1)..... | 8, 9, 10 |
| RCW 26.09.240..... | 28 |
| RCW 26.19.075..... | 26 |

Regulations and Rules

| | |
|------------------|----|
| RAP 18..... | 27 |
| RAP 18.1..... | 27 |
| RAP 18.1(b)..... | 27 |
| RAP 18.1(c)..... | 28 |

Other Authorities

Not applicable

I. Joint Decision-Making

A. There Is No Statutory Provision That Authorizes Imposition Of Joint Decision-Making Based On The Best Interests Of The Child.

Mr. Pennington's brief cites three sources of authority for his argument that the best interests of the child standard is an independent basis upon which the court can impose joint decision making on parents. *In re the Marriage of Possinger*, 105 Wn. App. 326 at 336, 19 P.3d 1109 (2001), did not pertain to any joint decision making issues. RCW 26.09.184(1)(d) expressly limits the court's authority to do so to the "...criteria in RCW 26.09.187 and RCW 26.09.191. Sub (g) merely instructs the court to tailor any plan provisions "to otherwise protect the best interests of the child, consistent with the policy of RCW 26.09.002."

RCW 26.09.191(1) speaks to what prohibits a court from imposing it. RCW 26.09.187(2) circumscribes under what circumstances it would be reasonable to object to it being imposed. If it is to be awarded, RCW 26.09.184(4) governs what issues the court can require be jointly decided by parents. These are the exclusive statutory provisions that govern joint decision-making issues. None of these statutes provide that the best

interests of the child is an independent basis for determining these questions.

His arguments under RCW 26.09.191 and 187(2) must fail for the following reasons.

B. RCW 26.09.191(1): The Failure To Find Willful Abandonment for An Extended Period of Time or a Substantial Refusal to Perform Parenting Functions, Is Reviewable on Appeal

Mr. Pennington cites no authority for his argument that the court's failure to make either of these findings is not reviewable on this appeal. Instead, his brief misrepresents that RP 83 shows he did not oppose an extension of the domestic violence protection order to trial (page 8)¹. Therefore his abandonment of Katelin was not willful; and he did not refuse to perform parenting functions. His testimony at RP 83 does not support that representation. In fact the transcript of the actual hearing, shows that he both opposed the extension of the order and asked for dismissal of her petition. (trial exhibit 94, page 16).

He explains that Ms. Laughlin's domestic violence claim, the criminal prosecution resulting from it, and her voluntary support of Valerie Fox's case against him (an allegation not supported by the record)

¹ Notations that are a parenthesis enclosed with a page number refer to the page in Mr. Pennington's brief that contains the allegation or representation cited in this brief.

“weighed heavily on John’s decision to forego any request for visitation until trial” (p.14). These attitudes merely explain why he willfully abandoned his child and substantially refused to perform parenting functions.

The findings that he did so should have been made, thereby precluding the court from ordering joint decision making, under RCW 26.09.191(1). If this court comes to a different conclusion, then the question becomes whether Ms. Laughlin’s opposition was reasonable.

C. Ms. Laughlin’s Argument As to Why Opposition To Joint Decision-Making Authority Was Reasonable Is Not Nonsensical

1. Ms. Laughlin’s Credibility Regarding Domestic Violence Has No Bearing On The Reasonableness Of Her Opposition

Mr. Pennington argues that the finding that Ms. Laughlin was not credible as to domestic violence, and her propensity to engage in abusive use of conflict, are character flaws that render nonsensical the notion that her opposition to joint decision-making is reasonable. He tries to support his argument by making the following inaccurate representations.

That she did not express fear of Mr. Pennington before the physical separation of the parties, which was less than two months before Katelin’s

birth in July 2008 (p.4). The testimony of two witnesses, on which he relies make no reference to any time frame. His argument ignores the testimony of Sally Johns, who heard Ms. Laughlin express fear of him in numerous conversations while she was pregnant (RP 203, 206, 208). Ms. Johns even tried to talk her out of marrying him because of the way he treated her (RP 210).

He argues that trial exhibit 90, the transcript of a hearing in Snohomish County, shows that Ms. Laughlin voluntarily supported Valerie Fox's petition to modify the parenting plan involving Grace. Exhibit 90, page 3 shows that the hearing had no connection with a petition to modify. Nothing else in the record supports his contention. In fact, the record shows the opposite.

Linda Laughlin, her mother, testified that Ms. Laughlin refused to talk to Valerie Fox during this proceeding (RP 107). Ms. Laughlin had to be subpoenaed by Ms. Fox's lawyer into court. (RP 329). At the end of the proceeding, Ms. Fox's counsel asked her, off the record, if Grace was in danger, and represented to the court that she said "yes"(trial exhibit 90).

2. The Connection Between Mr. Pennington's Lack of Credibility: His Propensity to Manipulate People by Distorting and Misrepresenting Information: The Likelihood of Parental Conflict If Decisions Must Be Made Jointly

Mr. Pennington's credibility as to his personal counseling is not the reason the court ordered him to "a more rigorous treatment modality" (p. 10). Debra Hunter (not a guardian ad litem as his brief suggests) expressed concerns about the connection between Mr. Pennington's propensity to withhold and distort information and the likelihood of future parental conflict. (RP 364) as did Dr. Hedrick (trial exhibit 129). Mr. Pennington's testimony as to his therapy is only one of many examples of that supported their concerns.

At the beginning of the trial, Mr. Pennington's counsel announced he was not going to call the therapist, Susan Fenner, as a witness (RP 12). Nor did he offer proposed trial exhibit 16, a letter from Fenner. In this way Mr. Pennington was free to provide uncorroborated testimony about his therapy.

On the last day of trial, he testified that therapy was no longer necessary because he was in counseling with Fenner for anger management on a weekly to bi-weekly basis, interrupted only by the winter holidays and parts of the summer, from the summer of 2008 through the time of trial in January 2010 (RP 645-646; 660, 661). After his testimony ended counsel for Ms. Laughlin, withdrew his objection to the admission of Fenner's letter and it was admitted at trial's end (RP

673). The letter indicates counseling lasted only 3 months and ended more than one year before trial in November 2008. This was consistent with what Fenner told Hunter (trial exhibit 25, page 131). Thus Pennington's testimony was a clear attempt to deceive the court in an attempt to persuade that with a certificate of completion of an anger management class in 2006 (Trial Exhibit 9) and therapy with Fenner he no longer needed anger management therapy (RP 545-546).

The court ordered him into a state certified domestic violence program as recommended by Debra Hunter, not because he lied about still being in therapy or about how much therapy he had, but because the court found: "Anger management and control issues that indicate the petitioner would benefit from additional extended therapy to address the behaviors identified in the psychological reports and parenting evaluations." (CP 372-374). There were numerous other examples that supported both experts' conclusions about his inability to cooperate and the likelihood of future parental conflict, given his propensity to misrepresent and distort information (as well as Ms. Laughlin's tendency to see ambiguous conduct as unambiguous (trial exhibit 129)).

Pennington told Hunter that in his Snohomish County divorce from Valerie Fox, the evaluating psychologist, Dr. Elizabeth Robinson,

expressed no concerns about him; only about her. (RP 329). Hunter obtained the findings of the Snohomish County Court to discover explicit findings of specific concerns about Mr. Pennington quoted straight from Dr. Robinson's report (Trial Exhibit 20; RP 321 and 323), and that he perpetuated two distinct acts of domestic violence against Valerie Fox (Trial Exhibit 20, RP 323). And yet, Mr. Pennington's sister, testified on his behalf in this proceeding that he told her that the Snohomish County trial Judge did not find that he committed any acts of domestic violence against Fox. (RP 139).

Pennington told Hunter that he did not contest entry of the initial domestic violence protection order obtained by Ms. Laughlin in 2008 (RP 363). In fact he appeared at the hearing, filed a 17-page declaration with 36 pages of attachments in opposition (RP 530), and opposed entry of the order. (See trial exhibit 93, pages 17-26, the hearing transcript).

In elaborating her concerns about his propensity to inappropriately engage in conflict, Debra Hunter testified that in her presence he coached Grace to say negative things about Ms. Laughlin (RP 349 – 352). Hunter also expressed concern that he insisted that Ms. Laughlin's mother with whom she lived and who took care of Katelin at times had an inappropriate sexual attraction with Ms. Laughlin's adult brother and she

had an unclean house all of which Hunter stated was untrue, and which caused Hunter to see these allegations as further red flags as to the likelihood of parental conflict in the future. (RP 364 and 462).

As another example of deceiving to manipulate, he told Debra Hunter that after Ms. Laughlin left, he did not try to talk her into coming back by telling her that his daughter Grace was sick and needed her (RP 345). However, the trial judge heard his voice mail to Ms. Laughlin in which he tells her Grace had been sick for two days, “running a fever and puking. She’s called for you...” as he urges her to “reengage” with Grace (RP 548: trial exhibit 126).

Finally, unrefuted was the testimony of a lay witness who saw Pennington’s live-in girlfriend give Ms. Laughlin the finger as she drove by her on the street (RP 507). Thus, the concerns of both experts adopted by the court had a firm basis. The signs of future parental conflict and their inability to cooperate if forced to decide a myriad of parental decisions jointly, manifested on every level, in a very troubling way.

3. Ms. Laughlin Fulfilled the Statutory Criteria Under RCW 26.09.187(2) For Determining the Reasonableness of Her Objection to Joint Decision Making.

His brief argues at page 20 that the court considered all of the statutory factors under RCW 26.09.187(2) in refusing to determine that

Ms. Laughlin's opposition to joint decision-making was reasonable. However he gives no citation to the record to support his argument. There is nothing in the record to indicate that the court weighed any of the three statutory factors under RCW 26.09.187(2)(c) at all. That those factors circumscribe the strict limits of what a court can consider before determining the reasonableness of a parent's opposition under RCW 26.09.187(2)(b)(iii) is further demonstrated when viewed in pare materia with the following policies and objectives: "to foster stability" (RCW 26.09.002) and to "minimize the child's exposure to harmful parental conflict..." (RCW 26.09.184(e),

Those factors as follows:

a. Whether the court finds limitations under RCW 26.09.191.

Mr. Pennington inaccurately asserts that the court did not impose "restrictions" for either party (p.9). In fact the court did impose restrictions to his access to Katelin by requiring supervised visits for the first two months and limited access to non overnights for the next 6 months given the lack of emotional ties due to his having no contact. (CP 376-378). RCW 26.09.187 does not speak to "restrictions" It speaks to

“limitations.” Mr. Pennington does not deny that the court found limitations as to both parties.

b. Whether there is a history of participation in parenting functions.

He does not deny that he had no history of participation. He argues he could not have because he agreed to the extension of the no contact order. This is another misrepresentation contained in his brief. He opposed the extension of the protection order (exhibit 94). He could have sought contact even if it were to be extended. He did not.

c. Whether there is a demonstrated ability to cooperate as to child rearing issues referenced in other statutes.

The summary contained under section I (C), pages 10–15 contained herein explains the propensities of both parents that support the conclusions of the experts about the parents that the court adopted: that the likelihood of the potential for future conflict is great since the parents are unable to cooperate. His responsive brief does not deny the overwhelming evidence of their inability to do so. Thus Ms. Laughlin met her burden as to the reasonableness of her opposition under the statute.

How then does Mr. Pennington cogently argue that her lack of credibility as to domestic violence renders the notion that her opposition to

joint decision-making is reasonable as “nonsensical”? In the face of the conclusions by both court appointed experts, supported by the totality of the record and adopted by the court, his argument is itself nonsensical.

His brief does not deny that there is no evidence that the treatment ordered for both parties or the use of a case manager will likely change this reality by February 2011 when the joint decision making provisions are to go into effect.²

D. The Absence of Language in RCW 26.09.184(4)(a) That Expressly Authorizes The Court To Impose Joint Decision Making Authority On Issues Other Than Education, Religion and Health Care Means That Trial Courts Do Not Have The Authority To Do So.

Mr. Pennington’s brief argues that scant authority cited in support of an assignment of error prohibits the Court of Appeals from considering it, relying upon *State v. Johnson*, 119 Wn.2d 167, P.2d 1082 (1992) and *State v. Wood*, 89 Wn.2d 97, 569 P.2d 1148 (1977). Neither case stands for that proposition. In *State v. Johnson*, supra, the court refused to deal with an issue not briefed raised for the first time in oral argument. In *State v. Wood*, supra at 99, the court refused to consider an assignment of error not supported by argument or citation to authority.

² The fourth statutory criterion, the geographic proximity of the parents (RCW 26.09.187(2)(c)(iv) is not an issue here.

Here Ms. Laughlin's opening brief identified the issue as an assignment of error and supported it by reliance upon RCW 26.09.184(4)(a) and argument as to what the statute authorizes the court to order absent agreement of the parties at pages 24-29.

The principle of statutory construction "*expressio unius est exclusio alterius*," means that a statute's express inclusion of one thing implies the exclusion of others. See *In re Detention of Martin*, 63 Wn.2d 501 at 510, 182 P.3d 951 (2008). There can be no legal conclusion other than the court's authority to impose joint decision making under RCW 26.09.184(4)(a) is limited to those issues expressly enumerated within it: health care, education, and religious upbringing. There is no authority to include the numerous other issues, absent agreement of the parties by the express terms of the statute.

II. The Name Change Issue:

A. Ms. Laughlin Did Not Place The Issue Before The Court and Did Not Invite Error.

Ms. Laughlin's response to the petition did not place the name change issue before the trial court. Section 1.3 of every state mandated form petition is entitled: "Children of the Marriage Dependent Upon Either or Both Spouses." (CP 103-109). It is the section through which the

parties agree or disagree whether there will be an issue as to whether a child is or will be a child of the marriage. Section 1.3 does not put the question of a name change at issue. In her response to section 1.3 of his petition, Ms. Laughlin simply represented that "...the infant's last name will be Pennington-Laughlin".

The only section of a petition or response that contains the claims each party requests of the court is relief section. He did not raise the name change issue in the relief section of his petition. In the relief section of her response she did not raise the issue of the child's last name. Thus her response is not a counter-claim on that issue. Her response did not invite error because it did not place the issue before the court for determination.

Mr. Pennington did not amend his petition to seek a name change. Thus when the certificate of compliance that requires all issues be framed was filed the name change issue was not before the court.

The case cited as to invited error, relates to an erroneous evidentiary decision invited by the complaining party, not as to the court's authority to make the decision itself. (See, *In re Dependency of K.R.* 128 Wn.2d 129, 147, 904 P.2d 1132 (1995) involving stipulation to admit polygraph testimony, to which objection was later made.)

B. The Cases Which Hold the Court Has No Authority Under RCW 26.09 to Impose A Name Change Still Control.

Mr. Pennington's brief at pages 25-26 argues that the trial court had the authority to order the name change. However his brief cites no case law or statute upon which that authority is based. In fact there is none.

That *In re the Marriage of Hurta*, 25 Wn App 95, 605 P.2d 1278 (1979) involved a post decree action is not a distinguishing factor rendering it inapplicable here. The holding did not turn on the standards necessary to modify a final order. It turned on the fact that under the marital dissolution act of 1973 there is no provision that authorizes the court to change a child's name. No subsequent amendments to the act have changed the validity of that legal conclusion. RCW 4.24.130(a) remains the only authority for a party to seek the name change of a child, and places it under the aegis of the district courts (RCW 4.24.130(1)).

The supreme court's decision in *Daves v. Nastos*, 105 Wn.2d 24, 711 P.2d 314 (1985) will not avail Mr. Pennington, because it was based upon the language of the old paternity statute ("...any other matter in the best interest of the child") that is lacking under any of the provisions of RCW 26.09.

C. There was No Evidence As To Why A Name Change From Pennington Laughlin to Laughlin Pennington Is In Katelin's Best Interest

The citations to the record contained in his responsive brief do not demonstrate why the name change is in Katelin's best interest. RP 51 merely talks of whether he was consulted about the name before separation. He said he wasn't. She said he was (RP 536). There was no testimony that a last name was ever discussed. Whether he was or not consulted as to the last name, is not evidence that the change is in Katelin's best interest. RP 146 is merely testimony that Mr. Pennington didn't know her name after she was born. He also cites RP 526 and 602 but they contain no testimony about the child's name or a name change whatsoever.

Lest Mr. Pennington's counsel, in oral argument, claims that using the name Laughlin, was part of an effort to exclude Mr. Pennington from Katelin's life, Ms. Laughlin named Katelin "... PENNINGTON (emphasis supplied) Laughlin.

The issue of the name change was not raised in his petition, or in his trial brief (CP 340 - 351). It was not raised in his attorney's opening statement (RP 14-18), or in trial testimony. It was not raised until his attorney requested the name change at the very end of his closing argument (RP 714). In his rebuttal, he did not deny, the observation made in closing

by her counsel, that there was no evidence as to why the change should occur. (RP 751; RP 752-755). In fact Ms. Laughlin informed the trial court that it had no such authority, by arguing the issue in a post trial memorandum, in which see cited *Hurta supra* and *Daves, supra*. (CP 435-437).

III. Property Division

A. A Finding That The Division of Property Is Fair And Equitable Is A Conclusion Of Law Subject to De Novo Review.

A conclusion of law couched as a finding is treated as a conclusion of law and as such is subject to de novo review. *In re the Welfare of LNB-L*, 156 Wn. App. 591, 234 P.3d 311 (2010). Since the court is mandated by RCW 26.09.080 to "...make such disposition of the property and the liabilities of the parties...as shall appear just and equitable after considering..." The determination that a given division of assets and debts as being fair and equitable is a conclusion of law.

B. Failure to Assign Error to a Finding Is Reviewable

If treated as a finding, where there is sufficient argument in the brief to recognize the nature of the challenge, the failure to assign error does not prevent consideration of the issue by the appellate court. (See *In re the Marriage of Brady*, 50 Wn. App. 728 at 730, 750 P. 2d 654 (1988)).

Its impropriety was amply and fully challenged in the body of the argument in Ms. Laughlin's brief in chief.

C. The Issue Framed By The Pleadings: Not Whether Ms. Laughlin Should Be Compensated For Improvements Made To His Home But Rather, By How Much.

In his testimony, Mr. Pennington did not deny the full extent of improvements made by Ms. Laughlin and her family. They purchased and brought large vertical slabs of granite rock to the backyard (RP 113-115), put in a week's work cementing and put rocks around a pond and cemented in a pump and lines for a waterfall (RP 114). They bought and installed grass, geraniums in big pots; repainted the entire inside of the house, upstairs and downstairs (RP 116). Cracks in the ceiling were spackled before painting (RP 539).

The relief section of Mr. Pennington's petition alleged that he should be made to pay Ms. Laughlin \$5,000 for the cost of the materials supplied to his home (CP 103-109). The response she filed did not deny that she should be compensated. Rather, she alleged it should be more (CP 110-113). Her testimony, unrefuted, was that it cost over \$10,000 to pay for the materials alone. (RP 466). Thus the issue, as framed by the

pleadings was not whether he should pay, but rather whether he should pay more than \$5000 considering the cost and labor involved.

D. The Court Made No Findings As To Property Values

Contrary to the argument in his brief, Mr. Pennington did not testify that the fair market value of crystal wedding gifts was \$5000 or furniture she took was \$20,000. He testified this is what Ms. Laughlin told him it was worth new. (RP 647-648). The legal standard is present fair market value at the time of trial (see *Wold v. Wold*, 7 Wn.App. 872, 503 P.2d 118 (1972) and *Mayo v. Mayo*, 75 Wn.2d 36 at 39, 448 P.2d 926 (1968)). There was no evidence and no findings as to current fair market value.

The only evidence of property fair market value was \$17,980 of personal property including wedding gifts in Mr. Pennington's possession awarded to him (trial exhibit 111).

E. The Tax Refunds Were Not Divided Between The Parties.

Contrary to what he argues, Mr. Pennington did not testify that he split or gave Ms. Laughlin any portion of the 2007 \$13,700 tax refund. (RP 653). In fact he did not deny the testimony that he took it (RP 467; 653).

As to the \$11,000 2008 refund that he took, he argues that the marriage was defunct as of the time Ms. Laughlin moved out in early May 2008. However he admitted he still loved her when he in early June (RP 153) he filed a petition for legal separation. He did so under the mistaken belief that the legal system could force her to reconcile with him (RP 155). He did not give up on the marriage until he filed his amended petition for dissolution in July 2008 (CP 26-32). He did not deny that he shared no portion of the refund with Ms. Laughlin (RP 468; 653).

IV. Child Support

The only evidence of the cost of health care coverage to include Katelin, was Mr. Pennington's testimony: that there is no additional cost to him beyond what it costs him to cover himself and Grace (trial exhibit 73). He provided no evidence that this had changed. Even if it had, the cost would not serve as a basis for deviation under RCW 26.19.075. It would be worked in to the work sheet at line 8(a) to calculate the standard calculation.

Nor was there evidence of what domestic violence treatment would cost him or that it would cost him anything.

Nor did Ms. Laughlin's motion for reconsideration suggest that his prior FEMA supplemental income should be included in the child support

calculation. The income on the worksheet submitted to correct the court's mis-calculation of the standard calculation excluded his prior FEMA income.

Finally, his brief misrepresents the record at RP 604 as evidence that she admitted earning tutoring income that she failed to report. RP 604 reflects that she had earned tutoring income of \$1500 -2000 annually, in years past, and that she reported it on her tax returns, the opposite of what he argues it demonstrates. There was no evidence that she was earning any income at any time during the separation, except from the job from which she was laid off, except her unemployment compensation at the time of trial.

V. Attorney Fees And Costs.

RAP 18.1 says nothing about citation to authority. All RAP 18.1(b) requires is that "a party devote a section of its opening brief to the request for fees or expenses" in the argument section of the brief. If an issue on this appeal was the trial court's failure to award fees, then the argument would require citation and analysis as to in what way the trial court abused its discretion. That is not an issue in this appeal. Ms. Laughlin has merely preserved her right to seek fees and costs as required by RAP 18.

In marital dissolution cases the relative financial circumstances of the parties (see RCW 26.09.240) could not be argued in her opening brief since the current financial declarations of the parties required under RAP 18.1(c) are not due until 10 days prior to oral argument.

The only other authority in a marital dissolution proceeding is intransigence, which could not be argued in her opening brief. She could not know in advance what work her attorney would have to do to establish the misstatements of the record and case law contained in Mr. Pennington's responsive brief.

Where intransigence is found, the financial resources of the parties are irrelevant. See *In re the Marriage of Burrill*, 113 Wn. App. 863 at 873, 56 P.3d 993 (2002). Intransigence includes tactics, which make litigation more difficult than necessary. See *In re the Marriage of Dalthorp*, 23 Wn. App. 904 at 913, 598 P.2d 788 (1970).

The misrepresentations as to RP 83, his position on the entry of the initial domestic violence protection order, his position on the extension of that order whether the trial court ordered restrictions, the misstatement as to why he was ordered into domestic violence treatment, and the mis-citing of case law, all caused Ms. Laughlin's attorney to spend time searching the record and writing this brief to reveal the misrepresentations.

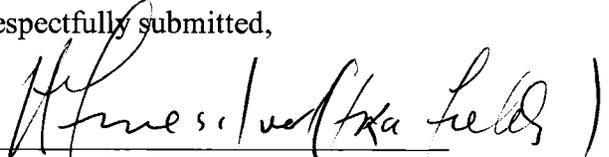
Fees should be awarded for this work which should have been unnecessary.

VI. Publishing This Decision

This case involves a number of issues of first impression: 1) whether the court abuses its discretion by failing to find willful abandonment or substantial refusal to perform parenting functions; if not 2) the burden of proof as to the reasonableness of opposition to joint decision-making; 3) the limits of what a court can impose as joint decisions under RCW 26.09.184(2); and 4) whether a court can impose a name change under RCW 26.09; i.e. whether *Hurta*, supra, is still good law. For those reasons we hope Mr. Pennington will agree that this court's decision should be published.

DATED this 17 day of November, 2010.

Respectfully submitted,


H. Michael Finesilver (fka Fields)
Attorney for Appellant
W.S.B.A. #5495

COURT OF APPEALS, DIVISION ONE
OF THE STATE OF WASHINGTON

| | | |
|---------------------------|---|----------------|
| JOHN EDWARD PENNINGTON, |) | |
| |) | |
| Respondent, |) | DECLARATION OF |
| |) | SERVICE |
| v. |) | |
| |) | |
| ANNE LAUGHLIN PENNINGTON, |) | |
| |) | |
| Appellant, |) | |
| _____ |) | |

I, Lester Feistel, state and declare as follows:

I am a Paralegal in the Law Offices of Anderson, Fields, McIlwain & Dermody, Inc., P.S. On the 17th day of November, 2010, I placed true and correct copies of the Reply Brief of Appellant with Seattle Legal Messengers for delivery on November 17, 2010 to:

2010 NOV 17 11:25:53
 COURT CLERK
 K

Karen D. Moore
Brewer Layman
333 Colbalt Building
3525 Colby Avenue
PO Box 488
Everett, WA 98206

I DECLARE UNDER PENALTY OF PERJURY OF THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

ORIGINAL

DATED at Seattle, Washington, on this 17 day of November,
2010.



Lester Feistel

Anderson, Fields, McIlwain & Dermody
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Seattle, Washington 98102
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