

70959-3

70959-3

No. 70959-3-I

COURT OF APPEALS, DIVISION I
OF THE STATE OF WASHINGTON

In re the Marriage of:

TAMMY J. TRIPLETT, Respondent,

v.

STEPHANIE L. CASE, Appellant.

RESPONDING BRIEF OF TAMMY J. TRIPLETT

FILED
COURT OF APPEALS DIV I
STATE OF WASHINGTON
2011 JUN 12 PM 3:20

Tammy J. Triplett,
Respondent, *pro se*
912 - 28th St. NE
Auburn WA 98002-2423

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I. INTRODUCTION

This case involves an adjusted Order of Child Support that was entered after this appeal began and from which no appeal was taken, and the dismissal of a Petition for Modification of Child Support that did not state a claim upon which relief could be granted.

Tammy Triplett requests that the appeal be denied and that she be awarded attorney's fees and costs for defending this frivolous appeal.

II. ABSENCE OF ERROR

No errors were made by the trial court. This appeal is frivolous, should be denied, and fees should be awarded to Tammy Triplett.

III. STATEMENT OF THE CASE

Acting on Stephanie Case's Motion to Adjust Child Support [CP 372-378], the trial court entered an Order of Child Support, Temporary Adjustment on February 6, 2013. [CP 27-34] This Order, from which no appeal was taken, accommodated Stephanie Case's income reduction due to her unemployment, correctly deviated support downward so that Stephanie Case's income would not be below the self-support reserve amount, and provided a mechanism for reviewing and adjusting child support after Stephanie Case was re-employed.

On June 24, 2013, Stephanie Case filed a Petition for Modification of Child Support [“Petition” herein]. [CP 35-41] On July 16, 2013, Tammy Triplett filed a Motion to Dismiss Petition for Modification of Child Support & Adjust Child Support Pursuant to Terms of February 6, 2013 Order. [CP 34-41] and noted her motion on the Family Law Motions Calendar to be heard on August 2, 2013. [CP 379-380] The order entered on August 2, 2013 [CP 381] stated that the court explained that the Motion to Dismiss should have been noted to be heard on the Trial by Affidavit calendar without oral argument, and that the issue of “dismissing for frivolous is reserved”, also to be heard on the Trial by Affidavit calendar without oral argument, and thus took no action on the Motion to Dismiss.

On August 6, 2013, Tammy Triplett gave new notice that her motion to dismiss and adjust would be heard on the Trial by Affidavit calendar without oral argument on August 23, 2013. [CP 290-291] On the same date, Stephanie Case filed notice of her Motion for Default against Tammy Triplett, also to be heard on August 23, 2013. [CP 101-102 & 109-111]

The court issued orders on September 9, 2013 after considering Tammy Triplett’s motions in chambers without argument. Stephanie Case’s Petition for Modification was dismissed [CP 382], and Tammy Triplett’s

Motion to Adjust was denied without prejudice (because financial documents required by King County LFLR 10 had not been supplied) with a directive to re-file the Motion to Adjust on the Family Law Motions Calendar. [CP 99-100 & 382] Stephanie Case moved for reconsideration of the dismissal of her Petition, which was denied on September 16, 2013. [CP 385]. The trial court's denial of reconsideration of the dismissal of the Petition is the order from which this appeal was taken on October 4, 2013. No action was taken on Stephanie Case's Motion for Default, likely because Tammy Triplett filed a Response to Petition on July 30, 2013 [CP 96-98].

As directed by the court on September 9th, Tammy Triplett filed a Motion to Adjust on September 24, 2013, [CP 294-298] which was granted on October 11, 2013 and an Order of Child Support entered [CP 148-163]. No appeal was taken from this Order.

Stephanie Case's claim seems to be that she should have been allowed to proceed to trial on her Petition for Modification of the February 6, 2013 Order of Child Support. It is Tammy Triplett's position that Petition was out of compliance with RCW 26.09.170 and the dismissal of the Petition was proper.

Stephanie Case in this appeal raises old day care and debt issues that have been addressed in previous trial court orders from which no appeal was taken. Consideration of these issues was not part of the 2013 order from which this appeal is taken.

Although Stephanie Case requests attorney's fees and costs based on her financial need and an alleged ability of Tammy Triplett to pay, she supplies no financial declaration to support her request.

Tammy Triplett requests that attorney's fees be awarded to her in this appeal because the appeal is frivolous.

IV. ARGUMENT

- A. Stephanie Case's Petition for Modification of Child Support was properly dismissed as it failed to state any claim upon which relief could be granted. The claims stated therein were barred by the substantial change requirement of RCW 26.09.170 and the doctrine of *res judicata*.**

Stephanie Case's Petition was dismissed because it failed to comply with RCW 26.09.170 and thus failed to state a claim upon which the court could grant relief.

When Stephanie Case's Petition was filed, the most recent Order of Child Support [from which no appeal was taken] was barely 4 months old. [CP 27-34] It contemplated that Stephanie Case's income would change

when she resumed employment, and provided a means for adjusting support when that happened, taking into account the incomes of both parents at the time of adjustment. RCW 26.09.170(1)¹ requires the “showing of a substantial change of circumstances” to modify any child support order, a requirement that is waived under circumstances irrelevant to this appeal if the order is more than 12 or 24 months old.

The bases of Stephanie Case’s Petition are her unemployment and its financial effects. These were considered in the February 6, 2013 Order of Child Support, existed at that time, and are not changes. The only circumstance that changed here is that Stephanie Case became re-employed and her income, and thus her ability to pay child support, increased as

¹RCW 26.09.170. Modification of decree for maintenance or support, property disposition - Termination of maintenance obligation and child support - Grounds.

(1) Except as otherwise provided in RCW 26.09.070(7), the provisions of any decree respecting maintenance or support may be modified: (a) Only as to installments accruing subsequent to the petition for modification or motion for adjustment except motions to compel court-ordered adjustments, which shall be effective as of the first date specified in the decree for implementing the adjustment; and, (b) except as otherwise provided in this section, ***only upon a showing of a substantial change of circumstances***. The provisions as to property disposition may not be revoked or modified, unless the court finds the existence of conditions that justify the reopening of a judgment under the laws of this state. [Emphasis added.]

anticipated in the Order. On February 6, 2013, the court made economic accommodations for Stephanie Case, and reduced her support obligation, based on her then unemployment and its economic effects on her, and stated its directive that the support amount would be reconsidered and adjusted in the future when Stephanie Case was re-employed and her future economic resources were known.

In her Petition, Stephanie Case also alleges she should be paid for judgments and fees related to old day care expenses, which were addressed by the court in 2007, 2008, 2009, and November 10, 2010, the last of these being affirmed by the Court of Appeals, Div. 1 in Case No. 66277-5-1. The doctrine of *res judicata* precludes any appellate court consideration of old day care expenses that were adjudicated prior to the filing of the Petition to Modify here, but Stephanie Case wants another day in court on these issues, too. Further, RCW 26.09.170 precludes retroactive changes to child support. Stephanie Case's complaints about old day care expenses relate to enforcement of a prior order, and not modification of a current order, and thus are not properly before the court in a Petition for Modification of Child Support.

B. Attorney's fees should be awarded to Tammy Triplett for having to defend this frivolous appeal.

Attorney's fees and costs should be awarded to Petitioner for this frivolous appeal pursuant to RAP 18.9(a), which authorizes the award of fees for defense of a frivolous appeal.

“An appeal is frivolous when, considering the record in its entirety and resolving all doubts in favor of the appellant, no debatable issues are presented upon which reasonable minds might differ; i.e., it is so devoid of merit that no reasonable possibility of reversal exists. *Brin v. Stutzman*, 89 Wash.App. 809, 828, 951 P.2d 291, review denied, 136 Wash.2d 1004, 966 P.2d 901 (1998).”

Stephanie Case has requested attorney's fees in her brief on the basis of financial need vs. ability to pay. RCW 26.09.140.² However, Stephanie Case

²RCW 26.09.140 provides:

“The court from time to time after considering the financial resources of both parties may order a party to pay a reasonable amount for the cost to the other party of maintaining or defending any proceeding under this chapter and for reasonable attorney's fees or other professional fees in connection therewith, including sums for legal services rendered and costs incurred prior to the commencement of the proceeding or enforcement or modification proceedings after entry of judgment.

“Upon any appeal, the appellate court may, in its discretion, order a party to pay for the cost to the other party of maintaining the appeal and attorney's fees in addition to statutory costs.

has no financial declaration as part of the record on appeal, and thus has failed to comply with RAP 18.1(c). Lacking any evidence of the parties' relative financial need and ability to pay attorney's fees, Stephanie Case's request for fees should thus be denied.

Tammy Triplett should be awarded fees against Stephanie Case. As cited above in the Argument section of this motion, there is no basis in law or fact for Stephanie Case's appeal. It is frivolous. The legal basis for an award of fees to defend a frivolous appeal is found in both RCW 4.84.185 and RCW 26.09.260(13).

RCW 26.09.260(13) provides:

“If the court finds that a motion to modify a prior decree or parenting plan has been brought in bad faith, the court *shall* assess the attorney's fees and court costs of the nonmoving parent against the moving party.” [Emphasis added.]

Bad faith “refers to conduct involving ill will, fraud, or frivolousness.” *In re Impoundment of Chevrolet Truck, WA License No. A00125A ex rel. Registered/Legal Owner*, 148 Wn.2d 145, 160 n.13, 60 P.2d 53 (2002), citing *In re Recall of Pearsall-Stipek*, 141 Wash.2d 756, 783, 10 P.3d 1034 (2000); *In re Estate of Mumby*, 97 Wash.App. 385, 394-95, 982

“The court may order that the attorney's fees be paid directly to the attorney who may enforce the order in his name.”

P.2d 1219 (1999); *Rogerson Hiller Corp. v. Port of Port Angeles*, 96 Wash.App. 918, 928-29, 982 P.2d 131 (1999).

RCW 4.84.185 provides:

“Prevailing party to receive expenses for opposing frivolous action or defense

“In any civil action, the court having jurisdiction may, upon written findings by the judge that the action, counterclaim, cross-claim, third party claim, or defense was frivolous and advanced without reasonable cause, require the nonprevailing party to pay the prevailing party the reasonable expenses, including fees of attorneys, incurred in opposing such action, counterclaim, cross-claim, third party claim, or defense. This determination shall be made upon motion by the prevailing party after a voluntary or involuntary order of dismissal, order on summary judgment, final judgment after trial, or other final order terminating the action as to the prevailing party. The judge shall consider all evidence presented at the time of the motion to determine whether the position of the nonprevailing party was frivolous and advanced without reasonable cause. In no event may such motion be filed more than thirty days after entry of the order.

“The provisions of this section apply unless otherwise specifically provided by statute.”

“[RCW 4.84.185] is designed to discourage abuses of the legal system by providing for an award of expenses and legal fees to any party forced to defend against **meritless claims** advanced for harassment, delay, nuisance, or spite.” *Skimming v. Boxer*, 119 Wn. App. 748, 756, 82 P.3d 707 (2004).

An action is **frivolous** within the meaning of RCW 4.84.185 if it “cannot be supported by any rational argument on the law or facts.” *Clarke v. Equinox Holdings, Ltd.*, 56 Wn. App. 125, 132, 783 P.2d 82, *review denied*, 113 Wn.2d 1001, 777 P.2d 1050 (1989). See also, *Tiger Oil Corp. v. Dep’t of Licensing*, 88 Wn. App. 925, 937-38, 946 P.2d 1235 (1997).

For ease of comparison, this brief responds to the remaining issues delineated in Stephanie Case’s opening brief in the order presented by Stephanie Case.

C. The Superior Court has subject matter jurisdiction regarding matters of child support. Assgn. of Error #1

The Superior Court’s subject matter jurisdiction over child support issues derives from Article IV, §6 of the Washington State Constitution, which states in part:

“The superior court shall have original jurisdiction in all cases at law which involve the title or possession of real property, or the legality of any tax, impost, assessment, toll, or municipal fine, and in all other cases in which the demand or the value of the property in controversy amounts to three thousand dollars or as otherwise determined by law, or a lesser sum in excess of the jurisdiction granted to justices of the peace and other inferior courts, and in all criminal cases amounting to felony, and in all cases of misdemeanor not otherwise provided for by law; of actions of forcible entry and detainer; of proceedings in insolvency; of actions to prevent or abate a nuisance; of all matters of probate, **of divorce**, and

for annulment of marriage; and for such special cases and proceedings as are not otherwise provided for. ..." [Emphasis added.]

and RCW 26.09.175, which delineates the standards for modifying and adjusting child support orders.

D. The court complied with King County LFLR 14(d). Assgn. of Error #2

Stephanie Case complains that the trial court did not follow its own rule, citing King County LFLR 14(d), which states:

“Independent Proceedings. Except as otherwise stated, Petitions for Modification of Support shall proceed as original determinations, with no threshold or adequate cause hearing required.”

There is no evidence to support Stephanie Case’s claim that this rule was violated, and does not claim any other rule was violated. The court did not require or hold a threshold or adequate cause hearing. The court complied with its own rules.

E. The court was not hostile or confused. Assgn. of Error #3

In all trial court hearings held regarding the issues in this appeal, evidence was presented to the court by affidavit or declaration. There was no trial, so no oral testimony was presented by either side. Judges and courts

rely on the parties to present their legal issues in an understandable way, and to connect applicable law to the facts of the case in requesting the court to resolve those issues. Stephanie Case's Brief is extraordinarily confusing, as are her trial court pleadings. The trial court did its best to respectfully sort through Stephanie Case's confusing and loquacious rambling to extract the issues, law and facts that apply to them, and make correct rulings. There is no evidence to the contrary.

F. No bias, humiliation, prejudice or improper judicial conduct occurred. The court hearings were fair and impartial. Assgn. of Error #4 & 5

Stephanie Case's sexual orientation is irrelevant in this child support proceeding and was not considered by, or presented to, the trial court in any way. At the August 2, 2013 hearing, Court Commissioner Bonnie Canada-Thurston erroneously addressed Stephanie Case as "Sir" and immediately corrected herself, and later addressed Stephanie Case as "Ma'am". [RP, 8/2/2013, page 4, line 1 and page 5, lines 11-12.] This inadvertent and immediately self-corrected imperfection of spontaneous speech does not constitute "manifest bias", "prejudice", an "aversion" to sexual orientation of a party, or "humiliation" by any normal definition of these common English words. No demeaning epithets were stated, no intimidation or

harassment occurred. Stephanie Case's sexual orientation was not presented to, or discussed by, the court.

Whatever happened at the trial court on October 11, 2013, no appeal was taken from the conduct and orders entered that day, and they are not before the court in this appeal.

The trial court's disagreement with Stephanie Case regarding the appropriate resolution of the legal issues presented does not constitute unfairness or impartiality by the common definitions of those terms. There is no evidence of any kind that supports Stephanie Case's claim the court was unfair or impartial in the rendering of the court orders that are the subject of this appeal.

G. Procedurally, there was a Motion to Dismiss the Petition to Modify and Motion to Adjust before the court. Assgn. of Error #6 & 8

On July 16, 2013, Tammy Triplett filed a Motion to Dismiss Petition for Modification of Child Support & Adjust Child Support Pursuant to Terms of February 6, 2013 Order [CP 51-79] and gave proper written notice that the motion would be presented to the court on August 2, 2013. [CP 379-380] On August 6th, the motion was re-noted to be heard on August 23rd without oral argument, and the court made its rulings in chambers on September 9th. [CP

382-384] Stephanie Case was given notice of the motion and these hearing dates, and noted her own Motion for Default to be heard at the same time as Tammy Triplett's motion. [CP 101-102 & 109-111]

H. Lack of Findings of Fact & Conclusions of Law is appropriate in a case where no fact finding hearing was held. Assgn. of Error #7 & 13

The court dismissed the Petition because it did not state a claim upon which relief could be granted. This was a decision of law, made without any findings of fact. Thus, it was appropriate that no Findings of Fact and related Conclusions of Law were entered.

I. Stephanie Case was not prejudiced by incomplete adjudication of her motion for default because a Response was filed and Tammy Triplett was not in default. Assgn. of Error #9

Washington courts broadly construe the concept of appearance, focusing on whether the defending party has acted in a way that indicates to the moving party that she intends to defend. As the court stated in *In re Marriage of Pennamen*, 146 P.3d 466, 135 Wn.App. 790 (Wash.App. Div. 1, 2006)

“Default judgments are disfavored as a matter of policy. As this court stated in *Batterman v. Red Lion Hotels, Inc.*, default judgments are normally appropriate only "when the adversary process has been halted because of an essentially

unresponsive party. "We are particularly reluctant to reverse a trial court's decision not to enter a default judgment in the family law context where many parties are pro se, procedural errors are common, and the welfare of children is at stake."

Three days before the August 2, 2013 hearing on Stephanie Case's Motion for Default, Tammy Triplett filed her Response to Petition [CP 96-98]. Tammy Triplett was actively participating in this litigation, and was not in default.

J. Stephanie Case's complaint about the starting date of the October 11, 2013 Order of Child Support is beyond the scope of this appeal and should be disregarded. Assgn. of Error #10, 11 & 12.

This appeal concerns court orders entered by the court BEFORE the Notice of Appeal was filed on October 4, 2013, not subsequent orders. The October 11, 2013 Order of Child Support, from which no appeal was taken, entered subsequently to the filing of this appeal, begins the adjustment of support in the month during which Tammy Triplett's Motion to Adjust was filed, when the court's jurisdiction over the issue began, yet Stephanie Case complains in this appeal filed before the Order was entered that the adjustment should not have started in June. This complaint should be disregarded.

V. CONCLUSION

This appeal frivolously alleges that the proper dismissal of a Petition for Modification of Child Support that states no claim upon which relief can be granted, because it does not allege a change of circumstances not contemplated by a 4 month-old Order of Child Support required by statute and violates the doctrine of *res judicata*, should be reversed. Instead, the trial court's dismissal of this Petition should be affirmed and fees and costs awarded to Respondent for having to defend the frivolous appeal.

Dated: May 8, 2014.



Tammy Triplett
Respondent, pro se

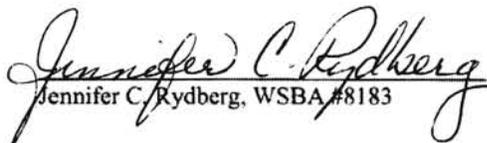
I, Jennifer C. Rydberg, hereby declare that on May 8, 2014, I mailed a copy of this document by first class mail, postage prepaid, to the following person and address:

Stephanie L. Case
2815 Alpine St. SE
Auburn, WA 98002

CERTIFICATION

I hereby declare under penalty of perjury of the laws of the State of Washington that the above statements are true and correct.

DATED: May 8, 2014.



Jennifer C. Rydberg, WSBA #8183

No. 70959-3-I

COURT OF APPEALS, DIVISION I
OF THE STATE OF WASHINGTON

In re the Marriage of:

TAMMY J. TRIPLETT,
Respondent,

v.

STEPHANIE L. CASE,
Appellant.

Declaration of Jennifer C.
Rydborg in Support of
Respondent, Tammy J. Triplett's
Request for Attorney's Fees

FILED
COURT OF APPEALS, DIV. I
STATE OF WASHINGTON
2014 MAY 12 PM 3:20

JENNIFER C. RYDBERG declares as follows:

1. I am the attorney Respondent, Tammy J. Triplett, secured for the purpose of writing her brief responding to this appeal. I make these statements based upon my personal, first-hand knowledge. I am competent to testify and if called, would repeat and affirm each and every statement herein.

*Responding Brief of
Tammy J. Triplett — 1 of 2*

2. Attached hereto is a statement of the time and costs incurred, and for which Tammy J. Triplett was billed, for attorney's fees and costs relating to her defense of this appeal. These fees and costs were ^{\$ 4,083.79⁰⁸} frugal, reasonable and necessary for her defense of this appeal. *guk*

I declare under penalty of perjury of the laws of the State of Washington that the foregoing statements are true and correct.

Signed at Kent, WA on May 8, 2014.

Jennifer C. Rydberg
Jennifer C. Rydberg, WSBA #8183

I, Jennifer C. Rydberg, hereby declare that on May 8, 2014, I mailed a copy of this document by first class mail, postage prepaid, to the following person and address:

Stephanie L. Case
2815 Alpine St. SE
Auburn, WA 98002

CERTIFICATION

I hereby declare under penalty of perjury of the laws of the State of Washington that the above statements are true and correct.

DATED: May 8, 2014.

Jennifer C. Rydberg
Jennifer C. Rydberg, WSBA #8183

	<u>Trans Date</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	
Client ID 20160.06 Triplett/Tammy	03/11/2014	300.00	2.00	600.00	Office conference with client; review Appellant's original brief; draft Motion for Extension of Time to File Response Brief, sign and route for service and filing, with copy to client.
	04/18/2014	300.00	7.20	2,160.00	Review file and appellate brief filed by Stephanie; legal research to determine law on various issues; draft Responding Brief of Tammy J. Triplett and Designation of Clerk's Papers, e-mail both to client with memo of instructions.
	04/21/2014	300.00	1.20	360.00	Office conference with client to review and discuss first draft of Responding Brief; review Designation of Clerk's Papers and provide client with instructions on how to proceed with it.
	05/07/2014	300.00	2.10	630.00	Review Index to Clerk's Papers received from client; revisions and updates to Responding Brief, including additional legal research.
	05/08/2014	300.00	1.00	300.00	Complete revisions to brief and add Table of Content & Table of Authorities, telephone discussion with client; e-mail brief to client for her review and signature; draft Declaration of Jennifer C. Rydberg in Support of Respondent, Tammy J. Triplett's Request for Attorney's Fees; copy and route brief and declaration after receiving client's signature and approval.
Subtotal for Fees		Billable	13.50	4,050.00	
	03/11/2014			0.48	Postage.
	03/26/2014	0.150		1.95	13 copies in March @ \$.15.
	04/18/2014	0.150		12.15	81 copies @ \$.15.
	05/08/2014			4.06	Postage.
	05/08/2014	0.150		15.15	101 copies @ \$.15.
Subtotal for Expenses		Billable	0.00	33.79	
Total for Client ID 20160.06		Billable	13.50	4,083.79	Triplett/Tammy Defense of 2013 Appeal
GRAND TOTALS					
		Billable	13.50	4,083.79	