

Priscilla E. Maxey (Pro se)  
502 N. Jst Apt. F  
Tacoma, WA 98403

CASE # 43733-3-II

Response to Appellant's Brief

FILED  
COURT OF APPEALS  
DIVISION II  
2013 APR 30 PM 1:31  
STATE OF WASHINGTON  
BY CM  
DEPUTY

In the matter regarding payments of child support :

Mr Ladson states that he is current on all payments and that no backpayment be recouped. This is a false statement. Mr. Ladson has not paid any amount of child support order, ordered in May 2013. Olivia does receive Social security benefits and is not part of the child support order. Mr Ladson's amount he receives from Social Security was not calculated in his income on child support worksheet because Olivia portion was already being taken out. He should be ordered to pay the backpay child support.

In the matter regarding healthcare coverage :

I have always provided healthcare and dental coverage for Olivia, and in no way should be forced to place her on Mr. Ladson's

insurance. Olivia is included in a family plan medical and dental, which is sufficient enough. A change for a medical plan is unnecessary.

In the Matter regarding Childcare :

Olivia requires childcare for before and after school hours. Half days of school, and school days off, school breaks and summer care. The school is used for childcare when available and so far this year (school year) I've paid out 739.00, other individuals are used for her childcare when school is unavailable, that usually ranges from 20.00 - 25.00 per day.

During the summer months care for summer day camps range from 125.00 - 145.00 per week. Mr. Ladson should not be concerned about paying the provider directly, his portion is included in the child support order.

This year the amount I am paying is a little lower than last year.

That is because my income has been

significantly reduced. I am now only employed at 20 hrs per week, from the previous 40 hrs per week. This change became in affect as of June 2012.

The current W-2 will reflect changes, and is available upon the courts request

In the Matter regarding Private School: Olivia attends Life Christian Academy, a school that Mr. Ladson and I both agreed upon prior to enrollment. She has been enrolled in this school for the past four years. She is academically strong in all of her subjects and is surrounded by peers and leaders who are teaching her Christian based values and how to apply them in her everyday life. Which is consistent to what is taught at home and church. It is disturbing and puzzling that Mr. Ladson is against wanting to help provide for this type of educational upbringing for his daughter.

In the Matter regarding Long distance travel: I strongly feel that it should be Mr. Ladson's

responsibility to provided travel for Olivia.  
Mr. Ladson chose to leave Washington and  
move to Georgia, then move further away to  
South Carolina.

I do also ask that the court order that  
Mr. Ladson provide ~~it~~ itinerary for forth  
and back travel, two weeks prior of  
release of child.

If i am to be responsible of any  
portion of travel, then the child support  
should be enforced so i may do so.

*Priscilla E. Maxey*  
Priscilla E. Maxey

I Priscilla E. Maxey hereby declare under penalty of perjury under the law of the state of Washington, that Mr. Ladson has been correctly served this copy of response through the US Postal service, certified mail at the address Below.

Deon A. Ladson  
129 Arbor Rd. Apt E.  
Summerville, SC 29485-5750

I declare under penalty of perjury that the foregoing is true and correct.

April 30, 2013

*Priscilla E. Maxey*  
Priscilla E. Maxey  
502 N. J St. Apt. F  
Tacoma, WA 98403