

RECEIVED
SUPREME COURT
STATE OF WASHINGTON
Jul 26, 2013, 10:34 am
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IN THE WASHINGTON STATE SUPREME COURT

In re the Marriage of
NEHA CHANDOLA NKA NEHA VYAS,
Respondent,
and
MANJUL VARN CHANDOLA,
Appellant.

No. 89093-5
Court of Appeals No. 68424-8-I

DECLARATION OF MANJUL VARN
CHANDOLA

Manjul Varn Chandola declares as follows:

1. I am the Appellant in this case. I am not in a position to pay Respondent's attorney fees. Further, based on my knowledge of Respondent's finances, I have reason to doubt that her situation is as dire as she suggests.
2. Prior to our property settlement, I believe that the Respondent was earning just over \$70,000 per year. Immediately after our property settlement, the Respondent's salary increased to \$85,000 per year and she began to receive \$577.97 in child support and \$468.07 per month in school tuition from me. Other than attorney fees and loans from her family, Respondent's financial position actually improved considerably after divorce.
3. Respondent claims that she is near the point of foreclosure although I recently transferred \$13,520 in funds from my Roth IRA account that I was required to pay her based on our property

DECLARATION OF MANJUL VARN CHANDOLA

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 ORIGINAL

Ex. 1

1 settlement. If she is truly in danger of foreclosure, she could apply some of those funds to the
2 mortgage.

3 4. Further, Respondent could save considerable money by agreeing to change the pre-school
4 for our daughter, P.R.C. Tuition at her pre-kindergarten is \$1185/month which comes out to
5 \$14,220 per year. While I do not have the opportunity to make decisions concerning what
6 school our daughter attends, I am required to pay \$468.07 for her tuition at Little Eagles.
7 Certainly, our daughter could attend a school with much more affordable tuition which would
8 allow both of us to save significant money. On November 2 of this year, P.R.C. will turn 5 and
9 can begin to attend kindergarten at a public school. I have long indicated that I am willing to
10 move to an inexpensive apartment in the Bellevue area to give P.R.C. the opportunity to attend
11 one of the top school districts in the nation.

12 5. Unlike my situation where I paid attorney fees in advance or in full upon being due,
13 Respondent was allowed to pay and I believe continues to pay her attorney fees in installments.
14 We have both borrowed considerable sums of money from our parents to pay for attorney fees. I
15 have reason to believe that her parents would grant her additional time to pay back loans, or loan
16 back to Respondent payments she has already made on the loans. As one who was privy to the
17 financial position of Respondent's parents and was sometimes asked to engage in certain
18 financial transactions on their behalf in which funds were transferred back and forth, I am aware
19 that her parents are U.S. citizens and have extensive financial holdings in both the United States
20 and India. I am also aware that her parents moved to India where the cost of living is much less
21 than in the U.S. My father, on the other hand, is a retired university professor in the United
22 States who supports our family and is lending me money to pay my attorney fees. He is an
23 honest tax paying U.S. citizen who does not have any foreign investments or property and any
24 award of attorney fees would further add to his financial burden.

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DECLARATION OF MANJUL VARN CHANDOLA

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1 6. I have incurred unnecessary expenses based on Respondent's false allegations of child
2 molestation against me. First, I had to pay 90% of the fee for supervision by Indaba Center
3 which supervised me under the conditions established for those suspected of child molestation.
4 I also had to pay for the services of psychologist Dr. Haygean due to the trauma that I
5 experienced from the false allegations and the restrictions placed on my time with our daughter
6 due to the allegations.

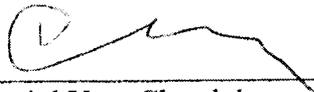
7 7. I am still attempting to establish my law practice. I am also hopeful that I will obtain
8 some money based on my employment lawsuit in which I am being represented on a contingency
9 fee basis by McDonald, Hogue and Bayless. Related Washington State court decisions have so
10 far been favorable for me. However, I am currently unable to support myself and am definitely
11 not in a position to pay Respondent's attorney fees.

12 I swear under penalty of perjury under the laws of the State of Washington that the
13 foregoing is true and correct.

14 Signed at Spokane, Washington:

15
16 7-25-2013

17 Date

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Manjul Varn Chandola

DECLARATION OF MANJUL VARN CHANDOLA

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From: Christina Albouras [mailto:calbouras@hotmail.com]
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To: OFFICE RECEPTIONIST, CLERK
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Subject: Chandola v. Chandola, No. 89093-5

July 26, 2013

Dear Clerk:

Attached for filing in *Chandola v. Chandola*, No. 89093-5, is Appellant's Reply to Respondent's Answer and Ex. 1. Please contact me with any questions. Thank you.

Sincerely,
Christina Alburas
Certified Paralegal
(206) 538-5301

* * * *

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