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STATE OF WASHINGTON *CR*

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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

In re the Marriage of:

NEHA VYAS, f/k/a CHANDOLA  
Respondent

and

MANJUL V. CHANDOLA  
Appellant

89093-5  
COA No. 68424-8-1

DECLARATION OF  
NEHA VYAS

Neha Vyas makes the following statements in the belief that they are true and accurate.

1. I am over twenty-one (21) years of age and competent, willing, and able to testify to the following, which is based upon my personal knowledge.
2. I am the respondent in these appellate proceedings and I am the mother of the child whose welfare is at issue.
3. My financial circumstances are roughly similar to the attached declaration, submitted to the Court of Appeals in February. I have paid off some debts, but incurred others. Prominently, I have had an urgent need for surgery to my gums, at a cost of approximately \$4000. I postponed this surgery long past when the doctor advised me to have it, but I have now had half of it done (i.e.,

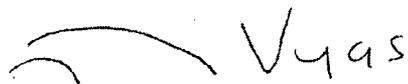
one side). I need to have the other half done in the next several months in order to avoid irremediable consequences to my health. I

4. I am also faced with a pressing need to lower my housing expense. Unfortunately, my home is worth less than the encumbrances on it. I have consulted with an attorney, at a cost of \$500, to explore my options. I expect to incur additional expense in the effort to get out of this house and into housing I can afford.

5. Finally, I have ongoing litigation expense at the trial level, in addition to the appellate proceedings. I had just finished paying the debt I owed to Skellenger Bender, my trial attorney, when an incident occurred with Varn that required me to incur another \$541 in fees. Basically, every month, I am struggling to meet my expenses.

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

Signed at Seattle, Washington on this 11th day of July 2013.

  
\_\_\_\_\_  
Neha Vyas

COURT OF APPEALS, DIVISION ONE  
STATE OF WASHINGTON

In re Marriage of:

NEHA VYAS f/k/a NEHA CHANDOLA  
Respondent,

and

MANJUL VARN CHANDOLA  
Appellant.

NO. 63424-8-1

FINANCIAL DECLARATION  
OF RESPONDENT

Name: Neha Vyas      Date of Birth: 4/3/1972

I. SUMMARY OF BASIC INFORMATION

Declarant's Total Monthly Net Income (from § 3.3 below)	\$ <u>5067.50</u>
Child Support Received from Manjul (inc. daycare contribution)	\$ <u>1044.04</u>
Declarant's Total Monthly Household Expenses (from § 5.9 below)	\$ <u>5747.30</u>
Declarant's Total Monthly Debt Expenses (from § 5.11 below)	\$ <u>600.00</u>
Declarant's Total Monthly Expenses (from § 5.12 below)	\$ <u>6347.30</u>
Estimate of the other party's gross monthly income	\$ <u>unknown</u>

My monthly expenses exceed my income and most of those expenses are fixed. Until now, I have been making up the shortfall with nonrecurring income (e.g., tax refunds, sale of my wedding ring). These funds are nearly gone.

II. PERSONAL INFORMATION

- 2.1 Occupation: Attorney
- 2.2 The highest year of education completed: J.D.
- 2.3 Are you presently employed? Yes, since August 2006, at:

Gibbs Houston Pauw  
1000 Second Avenue, Suite 1600  
Seattle, WA 98104



IV. ASSETS

4.1	Cash on hand	\$ <u>50.00</u>
4.2	On deposit in banks	\$ <u>5000.00</u>
4.3	Stocks and bonds, cash value of life insurance	\$ <u>0</u>
4.4	401(k)	\$ <u>16,000.00</u>

V. MONTHLY EXPENSE INFORMATION

Monthly expenses for myself and one dependent are:

5.1	HOUSING.	
	Rent, 1st mortgage or contract payments	\$ <u>2153.98</u>
	Installment payments for other mortgages or encumbrances	\$ <u>          </u>
	Taxes & insurance (if not in monthly payment)	\$ <u>          </u>
	Home owners association fee & mandatory upkeep	\$ <u>85.00</u>
	Total Housing	\$ <u>2238.98</u>
5.2	UTILITIES.	
	Electricity (includes heat)	\$ <u>125.00</u>
	Water, sewer, garbage	\$ <u>90.00</u>
	Telephone	\$ <u>194.41</u>
	Cable	\$ <u>29.99</u>
	Other (Security)	\$ <u>34.99</u>
	Umbrella Insurance	\$ <u>16.00</u>
	Total Utilities	\$ <u>490.39</u>
5.3	FOOD AND SUPPLIES.	
	Food for two persons	\$ <u>300.00</u>
	Supplies (paper, tobacco, pets)	\$ <u>          </u>
	Meals eaten out	\$ <u>50.00</u>
	Other	\$ <u>50.00</u>
	Total Food Supplies	\$ <u>400.00</u>
5.4	CHILDREN.	
	Day Care/Babysitting	\$ <u>1076.00</u>
	Clothing	\$ <u>40.00</u>
	Tuition (if any)	\$ <u>          </u>
	Other child-related expenses (recreation/party)	\$ <u>70.00</u>
	Total Expenses Children	\$ <u>1186.00</u>

5.5	TRANSPORTATION.	
	Vehicle payments or leases	\$ <u>305.67</u>
	Vehicle insurance & license	\$ <u>137.89</u>
	Vehicle gas, oil, ordinary maintenance	\$ <u>140.00</u>
	Parking	\$ <u>50.00</u>
	Other transportation expenses	\$ <u>12.00 (cab)</u>
	Total Transportation	\$ <u>645.56</u>
5.6	HEALTH CARE. (Omit if fully covered)	
	Insurance	\$ <u>see § 3.2d</u>
	Uninsured dental, orthodontic, medical, eye care expenses	\$ <u>10.00</u>
	Other uninsured health expenses (counseling for self & child)	\$ <u>186.37</u>
	Total Health Care	\$ <u>\$196.37</u>
5.7	PERSONAL EXPENSES (Not including children)	
	Clothing	\$ <u>65.00</u>
	Hair care/personal care expenses (includes child)	\$ <u>15.00</u>
	Clubs and recreation	\$ <u>10.00</u>
	Education	\$ _____
	Books, newspapers, magazines, photos	\$ _____
	Gifts	\$ <u>50.00</u>
	Other (ongoing dissolution related legal fees)	\$ <u>450.00</u>
	Total Personal Expenses	\$ <u>590.00</u>
5.7	MISCELLANEOUS EXPENSES.	
	Life insurance (if <u>not</u> deducted from income)	\$ _____
	Other _____	\$ _____
	Other _____	\$ _____
	Total Miscellaneous Expenses	\$ _____
5.9	TOTAL HOUSEHOLD EXPENSES (The total of Paragraphs 5.1 through 5.8)	\$ <u>5,747.30</u>

5.10 INSTALLMENT DEBTS INCLUDED IN PARAGRAPHS 5.1 THROUGH 5.8.

<u>Creditor</u>	<u>Description of Debt</u>	<u>Balance</u>	<u>Month of Last Payment</u>
<u>Wells Fargo</u>	<u>Mortgage</u>	<u>\$289,972.00</u>	<u>January</u>
<u>Wells Fargo</u>	<u>Home Equity Line of Credit</u>	<u>\$53,717.00</u>	<u>January</u>

5.11 OTHER DEBTS AND MONTHLY EXPENSES NOT INCLUDED IN PARAGRAPHS 5.1 THROUGH 5.8.

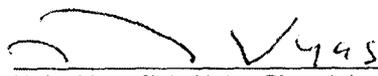
<u>Creditor</u>	<u>Description of Debt</u>	<u>Balance</u>	<u>Month of Last Payment</u>	<u>Amount Monthly Payment</u>
<u>Skellenger Bender</u>	<u>Legal Fees</u>	<u>\$1,800.00</u>	<u>January 2013</u>	<u>\$ 600.00</u>
<u>Promissory note parents</u>	<u>Loan legal fees</u>	<u>\$15,000.00</u>	<u>2011</u>	
<u>Promissory note sister</u>	<u>Loan legal fees</u>	<u>\$5,000.00</u>	<u>none yet</u>	
<u>Loan from parents</u>	<u>Legal fees</u>	<u>\$48,000.00</u>	<u>none yet</u>	
<u>Total Monthly Payments for Other Debts and Monthly Expenses</u>			<u>\$ 600.00</u>	
5.12 TOTAL EXPENSES (Add Paragraphs 5.9 and 5.11)			<u>\$ 6347.30</u>	

VI. ATTORNEY FEES

- 6.1 Amount paid for attorney fees and costs to date: \$ 150,000.00
- 6.2 The source of this money was: self, parents, sister, personal jewelry
- 6.3 Fees and costs incurred but not yet paid to date: \$ 1,800.00
- 6.4 Arrangements for attorney fees and costs are: payment plan
- 6.5 Other:

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

Signed at Seattle, WA, on February 12<sup>th</sup>, 2013.

  
Neha Vyas f/k/a Neha Chandola

## OFFICE RECEPTIONIST, CLERK

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**To:** Pat Novotny  
**Cc:** David Zuckerman; Janet M. Helson; Greg Miller  
**Subject:** RE: Chandola, COA No. 68424-8-I

Received 7/11/2013

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

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**From:** Pat Novotny [<mailto:novotnylaw@comcast.net>]

**Sent:** Thursday, July 11, 2013 1:49 PM

**To:** OFFICE RECEPTIONIST, CLERK

**Cc:** David Zuckerman; Janet M. Helson; Greg Miller

**Subject:** Chandola, COA No. 68424-8-I

Attached for filing in pdf format is the Respondent's Answer to Petition for Review, Declaration of Neha Vyas, and Declaration of Service in Marriage of Chandola, COA No. 68424-8-I. The person submitting these pleadings is Patricia Novotny, WSBA No. 13604, whose email address is [novotnylaw@comcast.net](mailto:novotnylaw@comcast.net).

Thank you