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NO. 926204

SUPREME COURT OF THE STATE OF WASHINGTON

In Re: the Paternity of: M. H.,

STEPHANIE BELL,

Petitioner,

v.

JUAN SIDRAN HEFLIN,

Respondent

ANSWER OF PETITIONER TO BRIEF OF AMICUS CURIAE OF
THE STATE OF WASHINGTON DEPARTMENT OF SOCIAL AND
HEALTH SERVICES

Bruce O. Danielson, Esq.
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ORIGINAL

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Washington Statutes

RCW 26.21A.515(1)1

RCW 26.21A.515(2).....1

A. INTRODUCTION.

The Washington State Attorney General filed Briefs of Amicus Curiae on behalf of the Washington Department of Social and Health Services.

B. ARGUMENT.

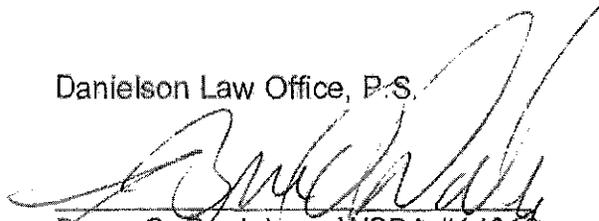
Petitioner concurs with the legal analysis and cited authority of the State of Washington that RCW 26.21A.515(2) determines the enforcement of child support arrears by applying the longer of the statute of limitations of Washington or the issuing state, in this case Indiana. The Petitioner's citation to RCW 26.21A.515(1) was misplaced as the controlling statutory authority with regards to the statute of limitations to collect child support arrears.

C. CONCLUSION

The decision of the Court of Appeals should be reversed.

RESPECTFULLY SUBMITTED this 1st day of September, 2016.

Danielson Law Office, P.S.



Bruce O. Danielson, WSBA #14018
Attorney for Petitioner Stephanie Bell

CERTIFICATE OF SERVICE

Bruce O. Danielson, hereby declares and states as follows:

That on the 1st day of September , 2016 I served a true and correct copy of this document, **ANSWER OF PETITIONER TO BRIEF OF AMICUS CURIAE OF THE STATE OF WASHINGTON DEPARTMENT OF SOCIAL AND HEALTH SERVICES**, on the respondent, through his counsel of record and the State of Washington Department of Social and Health Services filing an amicus curie brief, on the date below by United States Mail, postage prepaid as follows:

COUNSEL FOR THE RESPONDENT JUAN HEFLIN:

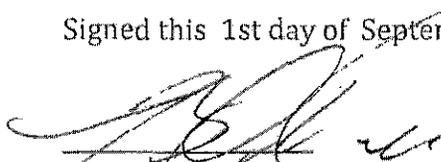
Helmut Kah
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Woodinville, WA 98072

COUNSEL FOR THE WASHINGTON DEPARTMENT OF SOCIAL AND HEALTH SERVICES:

Lianne S. Malloy	Peter B. Gonick
Assistant Attorney General	Deputy Solicitor General
P.O. Box 40124	P.O. Box 40100
Olympia, WA 98504-0124	Olympia, WA 98504-0100

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

Signed this 1st day of September, 2016 at Port Orchard, WA.

A handwritten signature in black ink, appearing to read "Bruce G. Danielson", written over a horizontal line.

Bruce G. Danielson

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Friends:

Attached please find for filing in the the following identified matter the **Answer of Petitioner to Brief of Amicus Curiae of The State of Washington Department of Social and Health Services.**

In Re: the Paternity of M.H
Stephanie Bell, Petitioner v. Juan Sidran Heflin, Respondent
Supreme Court Cause No. 926204

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