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NO. 926204

SUPREME COURT OF THE STATE OF WASHINGTON

In re Paternity of M.H.,

STEPHANIE BELL,
Petitioner,

v.

JUAN SIDRAN HEFLIN,
Respondent.

PETITIONER'S STATEMENT OF
ADDITIONAL AUTHORITIES

Pursuant to RAP 10.8, the Petitioner submits the following additional authorities for the issues raised by the respondent during oral argument: Was the petitioner required to reduce the Indiana Order of support to judgment when registered for enforcement in Washington?

And: Is the February 23, 2011 Superior Court Order a Judgment?

42 U.S.C. § 666. Requirement of statutorily prescribed procedures to improve effectiveness of child support enforcement

....
(9) Procedures which require that any payment or installment of support under any child support order, whether ordered through the State judicial system or through the expedited processes required by paragraph (2), is (on and after the date it is due)—

(A) a judgment by operation of law, with the full force, effect, and attributes of a judgment of the State, including the ability to be enforced,

(B) entitled as a judgment to full faith and credit in such State and in any other State, and



ORIGINAL

Relevant Washington statutory law in effect at time of registration of Indiana Order for child support for enforcement in Washington:

RCW 26.21A.505 Procedure to register order for enforcement.

...

(2) On receipt of a request for registration, the registering tribunal shall cause the order to be filed as a foreign judgment, together with one copy of the documents and information, regardless of their form.

RCW 26.21A.505(2) was amended in 2015: Laws of 2015, chapter 214, section 30 and now reads in pertinent part:

RCW 26.21A.505 Procedure to register order for enforcement.

...

(2) On receipt of a request for registration, the registering tribunal shall cause the order to be filed as an order of a tribunal of another state or a foreign support order, together with one copy of the documents and information, regardless of their form.

CP 61, Declaration of Stephanie Bell with attached Settlement Agreement of the parties, page 27:

“WHEREAS, on February 23, 2011 and on April 11, 2011 under King County Cause No. 10-3-06637-7 Judgments were entered against Juan Heflin, for unpaid child support and expenses, in the principal sums of \$110,709.23 and \$12,804.64, respectfully.”

“WHEREAS, both parties have had the benefit and advice of counsel prior to entering into this Agreement and acknowledge that they have read and understood the terms, condition and responsibilities hereunder.”

CP 61, Declaration of Stephanie Bell with attached Settlement Agreement of the parties, page 28:

“9. In the event of contest this agreement shall not be construed against the drafting party. The agreement is to be read and applied as a whole, including the “whereas” provisions of this agreement, which provisions are incorporated herein by this reference. “

“12. This is the entire Agreement of the parties. There are no other Agreements express or implied. In the event of contest, this Agreement shall be strictly construed for purposes of assuring payment in full of the child support obligation of Juan Heflin. This Agreement may only be modified in writing signed by both parties.”

Filed this 28th day of September, 2016

Danielson Law Office, P.S.



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

Bruce O. Danielson, hereby declares and states as follows: That on the 28th day of September , 2016 I served a true and correct copy of **PETITIONER'S STATEMENT OF ADDITIONAL AUTHORITIES** on the parties listed below respondent by United States Mail, postage prepaid as follows:

COUNSEL FOR THE RESPONDENT JUAN HEFLIN:

Helmut Kah
DeYoung Commerce Center
17924 140th Ave. N.E., Suite 204
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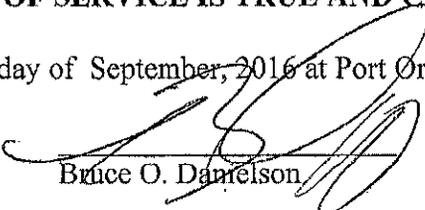
COUNSEL FOR THE WASHINGTON DEPARTMENT OF SOCIAL AND HEALTH SERVICES:

Lianne S. Malloy
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P.O. Box 40124
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Peter B. Gonick
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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 28th day of September, 2016 at Port Orchard, WA.


Bruce O. Danielson

OFFICE RECEPTIONIST, CLERK

From: OFFICE RECEPTIONIST, CLERK
Sent: Wednesday, September 28, 2016 12:15 PM
To: 'bruce@brucedanielsonlaw.com'
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Supreme Court Clerk's Office

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From: Bruce Danielson [mailto:bruce@brucedanielsonlaw.com]
Sent: Wednesday, September 28, 2016 12:08 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Subject: Bell v. Heflin, Washington Supreme Court 92620-4

In the following matter, attached to this email please find Petitioner's Statement of Additional Authorities per RAP 10.8.

Case name: Stephanie Bell v. Juan Sidran Heflin

Washington Supreme Court Case No. 926204

Submitted by counsel for the Petitioner:

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