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COURT OF APPEALS, DIVISION I
OF THE STATE OF WASHINGTON

In re the Marriage of

PADMAJA KRISHNAVENI
CHILUVURI,
All that involved in any form or
representation with respect to the case in
point starting from JAN, 2005

RESPONDENTS,

v.

MURALIDHARA VARMA CHILUVURI,
Respondent.

NO. 66157-4-I

BRIEF OF APPEALS

Muralidhara Varma Chiluvuri, THE APPELLANT hereby files the initial brief to support the appeals of the Final Parenting Plan and Order of Child Support Final Order entered September 29, 2010. Copies of these orders are attached. This is to not only identify some of the inconsistencies but also to note and requiring a response from each and every official or not there of involved in this case thus far from the very start

1 in JAN, 2005. And such respondents shall not be limited to just the one PADMAJA
2 KRISHNAVENI CHILUVURI, THE PETITIONER IN Superior Courts.

3 As mentioned before I am NO LAWYER and have intention to be AMICUS CURIAE,
4 representing myself here as a HUMAN, a CITIZEN it is of the Sovereign State of WA
5 as well as USA, that country that I belong to as well as the child. Irrespective of the
6 locations and type of involvement I hearby request a response by all involved in what
7 they believe this case shall never be appealed. Because if I start listing them all, afraid
8 any page limits are not just sufficient...as I have to illustrate on my claims on why I lost
9 trust in JUSTICE, how OBSTRUCTION OF JUSTICE is caused, how and what makes
10 me infer what I infer from each and every time a COURT proceeding or directed
11 thereof like mediations and arbitrations to convincingly illustrate the root cause behind
12 the behaviors observed in issuing ORDERS that are not till date not accountable or even
13 practical, abusing all my rights thereof causing disrespect and humiliations that are
14 unparalleled causing significant distress, pain, hurt and alike that one can name both for
15 parties involved as well as the CHILD whose best interests are supposed to be the
16 primary interest of any FAMILY CASE that are completely ignored.

17 Now to list why I appealed on some of the clauses...its everything. But to keep the
18 interest and not be vague on its prima face... here are few

- 19 1) Relocation is a major modification...and I never received any final orders that
20 permit such relocation even as per the relocation LAWS or ACT that I was
21 informed but have no access to verify.
- 22 2) FINDING OF FACTS and its filing is a must with any order...its absent as
23 always with every order except only one issued along with DECREE that was

1 inappropriate...not the one as prepared by the RESPONDENT then NOW THE
2 APPELLANT that was supposed to be presented by the PETITIONER then but
3 now one such RESPONDENT. In fact the orders issues are the copies of
4 Padmaja signed by Judge as final order, totally leaving aside any agreements
5 made by parties as part of arbitration. My signatures were not even present to
6 illustrate acceptance...and only my counsel to illustrate the receiving of papers
7 that was not authorized as acceptance.

8 3) The parenting plan permits her parents to accompany the child while travelling
9 abroad to USA and renounce my family and friends as possible choices legibly
10 or even otherwise as cost saving measures, a pure discrimination of many kinds
11 as explained partly in the Citizens Review letter that is informal and personal
12 attached just to help set the context and raise this point, in the CASE IN POINT
13 as human and not as lawyer. This is discrimination against my family that even
14 brought to such ruins where my father is lost and we couldn't be with him just
15 because of delays in the processes inspite of existing orders that permit. I put
16 the onus and responsibilities of such LOSS on the very COURTS who
17 discriminated. To understand such behaviors we need HUMANS as in
18 HUMAN LAW that do not OBSTRUCT JUSTICE for any CITIZEN due to
19 some ADMINISTRATIVE CODE OR LAW that he doesn't know how to
20 comply with.

21 4) I have no access to any public documentation pertaining to any rules or codes
22 that I am ought to comply with in spite of many repeated requests, out of which
23 several were pushed into INACTIVE folders of some sort.

- 1 5) I requested LAWYERS assistance, where I cannot afford one or not willing to
2 waste my resources in seeking JUSTICE that never was open to provide one for
3 a MALE that is FATHER as proven consistently from time to time in this case
4 and not just one relocation orders.
- 5 6) It is also to inform that the issues at the trial were only parenting plan and child
6 support orders. It is with such strict boundaries and further assurances by the
7 JUDGE, who even informed that any issue that is not relevant or goes back into
8 history shall permit me to produce any documentation and exhibits at will on
9 whatever platform. During the trial many such incidents occurred that we
10 couldn't point at exhibits because they were not needed and relevant to the
11 points under consideration of parenting plan or child support orders. One such
12 example is a lengthy discussion on how a contempt was ever issued, when
13 objected it was mentioned as relevant...and whatever was discussed had not a
14 single word related to any telephone call or such communication on telephones,
15 but just to wrap it up the opposing counsel says its relevant which was clearly
16 objected. This shall retain my rights to produce any and any thereof to prove my
17 points on how inconsistent, prejudice and discrimination of all kinds that I
18 believe with all my heart.
- 19 7) As for IRS tax exemptions...everyone in the hall admitted under the camera
20 including the JUDGE saying they are not sure whether or not I have to file taxes
21 in USA while residing in India. But went on to assign such rights only to one
22 party which even contradicts according to IRS rules and per the phone
23 conversations I had when IRS called in previous tax return filings. It was

1 clearly indicated that with whomever the child resides for more than 180 days
2 they are the only ones qualified. Now I further believe IRS is a federal law that
3 I am confused why it is even considered under FAMILY LAW within one state.
4 Why is there ever an assumption that I may not work for USA even remotely as
5 telecommuter and earn money? Why is there an assumption that if I sell my
6 home I don't need to pay taxes? Or even if I sell the stock in fidelity accounts
7 that I don't need to file taxes? FACTS MISSING, AND EVEN WHEN
8 PRESENT DO NOT SUPPORT THE ORDERS AS ALWAYS, because I AM
9 A MALE as observed and convinced throughout the case.

10 8) AS FOR IMMIGRATION LAWS...AND PER EXISTING ORDER AS
11 PARTIES AGREED AND SIGNED AS ORDERS BY JUDGES...It is to
12 permit either party to move without first complying to relocation act as set or
13 mentioned as a mandate in the order. Such clause was present in two different
14 locations...one at the end of relocation act and in OTHER PROVISIONS. Why
15 is such a party's agreement never honored and caused delays that even
16 hampered many employment opportunities violating my employment rights that
17 are CONSTITUTIONAL or otherwise irrespective of the location. Now there is
18 a difference in LAWS when the location change is within USA vs. outside the
19 borders of USA. It involved IMMIGRATION LAWS that I believe only
20 Federal courts can enforce...as per the case in precedent between White House
21 vs. State of Arizona, and who else knows it best than Mr. President whom I am
22 considering as my representative in this case to assist from hereon.
23

1 9) Another example, as per the temporary orders issues on April 13 2005, Section
2 3.4 second para says...the child shall be returned from India with 36 days from
3 the date the flight leaves Seattle for the petitioner...and at the end...Once the
4 child has been returned to King County, he will reside with the Respondent
5 pending the final decree. Now may I ask, why the child is not returned until late
6 July that required a contempt motion to be brought in front of courts and
7 magically the child appears on the eve of hearing. How the courts override the
8 agreements made by parties to compensate for the lost time with child for the
9 RESPONDENT, the FATHER it is, and rewrite a parenting plan saying A
10 HARD WORKING PARENT ESPECIALLY AT MICROSOFT CANNOT
11 AND MAY NOT BE ABLE TO CARE FOR THE CHILD. I infer a Microsoft
12 employee that is hard working is not deserved to be a parent, period. That is
13 discrimination of employment and employers.

14 10) THE PETIONER in this case never served any papers or exhibits in spite of
15 strict instructions from the COURTS, and is permitted to even send some partial
16 exhibits by forcing my counsel who was present to send them by email. Am I
17 not entitled to have the excerpts handy prior to any hearing with advanced
18 notice? The process was completely broken, while every time there are serious
19 directions like threats that my cases will be closed if I don't ever comply that I
20 am dying hard to without knowing how to.

21 11) I really wanted to delve into many other clauses individually that are not
22 equitable as the Hon. JUDGE herself said under the cameras...admitting and
23 saying HAVING BEEN PERMITTED EVEN TO RELOCATE IS ITSELF A

1 WIN for FATHER, So I KNOW HE WONT BE HAPPY BUT I CAN SIGN
2 WHATEVER I WANT TO...some words that mean as above...since I don't
3 even have access to transcript that the COURTS received at my expense. Not
4 sure how and where they are lost en-route. My counsel immediately informed
5 that I may be interested in taking it further, say appeal it in much nicer form as
6 they are AMICUS CURIAE. With that I was told its an automatic stay of the
7 orders under appeal...but it's getting implemented both in USA and in INDIA as
8 if no one cares.

9 12) Now there is a long argument about what Indian courts may do, whether or not
10 they honor foreign orders...well to everyone's surprise they assumed the
11 jurisdiction even when it doesn't qualify the very basic residential requirements,
12 even at an address that is not where the child resides or resided violating the
13 orders in USA about 10mile radius from school as the petitioner herself claimed
14 in her declarations...

15 13) Everyone agreed of not knowing what it costs to live in India and to what living
16 style, that by default shall be assumed as not much deviation from what was
17 available in USA as argued that house is 2 bdrm or not, is the locality good or
18 not, ...so on so forth. Is COLA not just location specific but living styles
19 consideration too...Does anyone deny that one cannot live with \$50 in USA
20 whether is a JUDGE or a public utility worker or a citizen that is struggling.
21 Isn't it by comparison determines whether is luxury or hardships that one adjusts
22 to survive. My survival was insulted, without even knowing a single fact about
23 India. Further to my request on including educational expenses and other as part

1 of child support orders in spite of repeated failures to retrieve any in the past
2 without much burden and expenses to keep circling around courts lifelong...a
3 struggle at length only produces vapor...that never worked or did even after
4 orders. An email thread between original parties is attached for reference on
5 school fees that were expected to be paid as per the JUDGE, when asked
6 explicitly.

7 14) I can keep going on every aspect...but one point I like to reiterate...the Hon.
8 JUDGE promised under camera that she is going to edit a version of orders,
9 parenting plan and child support and only make necessary corrections that were
10 only discussed as part of the trial, but she failed to keep such promise and went
11 on to modify many including the entire "OTHER PROVISIONS" as well as the
12 words "cannot be modified" under the section "DESIGNATION OF
13 CUSTODIAN", that were never even discussed or not part of the trial as parties
14 agreed and JUDGE promised to be in strict compliance of its scope. Why such
15 modifications and further a statement saying JUDGE can sign any of their orders
16 as per their own liking.

17 15) Now there was a long debate on security procedures at the school in India and
18 the RESPONDENT here claimed that everything is a LIE in the context of
19 deciding the best procedures as transfer points. Now I like that to be reviewed
20 with more exhibits attached as relevant to the case and no new issues is being
21 brought. The only point that it drives is the question of ACCOUNTABILITY
22 both all the respondents both PADMAJA and any and every that are involved
23 thus far in this family case.

1 16) I am in no capacity to duplicate every word, line, document and be able to
2 represent that well to help and guide Honorable JUSTICE at APPEALS court,
3 because of not only lack of resources that require significant amounts, but lack
4 of knowledge on how best to even present. So I had no option other than hiring
5 a representative for me in COURTS who is an eligible lawyer with license. He is
6 none other than my FIRST CITIZEN and Mr. President BARAK OBAMA as
7 per the attached confirmation of my demand from my own representative in
8 office and his correspondence team. I do not control his calendar or address for
9 many reasons including that of security. Whether accepted or denial thereof to
10 represent I request that to be in writing submitted to Court of APPEALS. I am
11 clueless from hereon...and my humble request is to forward all papers in this
12 brief to my representative and any further proceeding without jeopardizing my
13 any opportunity to avail JUSTICE or lack thereof without a proper consideration
14 under HUMAN LAWS or higher that of NATURE LAW. It is with this
15 confusion I am not even sure whether APPEALS is the proper venue for such
16 discussions, but I respond to your orders as it is a code and mandatory process
17 that I always respected without ever a failure.

18 17) Considering there are claims here by me that may extend the PROFILING to
19 CULTURE, RELIGION, etc that is GLOBAL as in diversity...not even sure if I
20 have to involve some representative from PUBLIC INTERNATIONAL LAW,
21 hence a follow-up to CEO of IFCW...Internation Forum of Child Welfare. I am
22 awaiting responses for all including Mr. President.
23

1 My humble request to you is simply to understand as per even the LAWS that a
2 significant violations even in just few examples illustrated above...and all it takes is just
3 one to prove the CASE IN POINT that is APPEAL...not for which and why a specific
4 clause of any orders are not by merits...but even to include on how and what influenced
5 in making such decision as APPEAL. As per my NAÏVE understanding of the LAW
6 and LAWS, APPEAL as a word stands for all in its entirety where the burden of proof
7 is on COURTS since in my humble opinion a FORMAL REVIEW OF HOW JUSTICE
8 IS ADMINISTERED IN LOWER COURTS, and not by any individual parties
9 (petitioner and respondent) in family case. THE REVIEW it is shall never be restricted
10 to the merits on decisions made in few individual cases, but when such cases are proved
11 to be wrong...it is the duty to analyze and explain why it is wrong and what remedies
12 shall be availed for the victims or suffers or beneficiary, here the APPELLANT.
13 I was told that similar to any case in Superior Courts of WA, the APPELLANT gets a
14 second chance to respond any allegations in defense or bring forward any further along
15 with any exhibits to support or prove not the new issues, the same issues as in relocation
16 trial and motions... and as promised by Hon. JUDGE but never gave an opportunity to
17 produce any missing exhibits that were only taken out based on her guidance to keep
18 the trial very strict to issues at hand and not any past. By virtue of opening up the past
19 that is not relevant to the case, I retain the right to open any and all that is part of the
20 case and handling such shear volume is just not possible for a simple HUMAN being.
21
22 Now as for the parenting plan, many clauses in that plan were violated soon after its
23 inception by JUDGE signing...some presented as exhibits just to illustrate...but not in

1 completion to save time...as the recent developments of changing the school for
2 CHILD, the one that was long debated as not her choice or suggestion...makes most
3 visitation clauses simply useless as the school calendar is not published to my
4 knowledge and no provision for any regular phone calls except for emergencies and the
5 number of holidays are very limited. Now this decision was informed to the
6 RESPONDENT, no questions asked, the decision was final and all phone calls,
7 visitation rights etc just stopped. Now my request is to look in depth and detail...so you
8 understand what is the real best interest of the child...and My final decision is not to
9 cause confusion by force when the child is not interested to see his any mother
10 (biological it is as approved and admitted by her in Indian Courts) who herself along
11 with her Indian attorney threatened his and my life to be crippled or more in addition to
12 try and pollute his mind. The JUDGE who I can only say corruptive, given time and
13 resources I can prove with 100% confidence legally on the same platform that he
14 presides to rule....tried and asked very leading and tricky questions to my child/son in
15 his chambers suggesting he shall go to mother...because he lived in USA all along, his
16 friends are in USA, he is USA Citizen...many more...and when finally asked for my
17 son's opinion...he got nothing but a resounding answer, sorry I have to admit like a
18 thundering slap from a 7 yr old without any influence, saying sorry as observed "WHY
19 DO YOU SUGGEST WHAT I SHALL DO, NOW I AM INDIA AND AM
20 PERFECTLY HAPPY". The JUDGE tried more...but only then, I interrupted saying if
21 he, the JUDGE, ever wants to talk to my son or even call him again to courts, he shall
22 seek permission from me formally. And now the counsel who represented her
23 threatened me at my own home saying if wants to due to his credentials in Hyderabad or

1 elsewhere, he can make me not see my son ever again....not even sure why he is trying
2 to provoke when he failed to humiliate in my entire housing complex by bringing 6
3 people and threatened the watchman, neighbors and many others apparently while I was
4 away...now shall I ask what is that you want me to do.

5 The result of which...as observed...My mom says "YOU TOOK YOUR DAD, NOW
6 IS IT MY TURN" and the child says "DADDY IF I DIE WILL MOM BE HAPPY
7 AND YOU HAVE NO FURTHER TROUBLES". Are you annoyed that I use the term
8 "says" and not observed...any LAWS INTERNATIONALLY OR OTHERWISE that
9 fail to protect a child and even drags him to courts irrespective of age limits that are
10 already set as permissible age for seeking opinions from KIDS that you base to get
11 annoyed has been violated already and that is not ME.

12 So not to close but to pause...all these are allegations and as I mentioned before the
13 burden of proof and the onus is on COURTS and THE RESPONDENT for which I
14 RESERVE THE RIGHT TO RESPOND TO ANY WITH ANY PROOFS THAT I
15 POSSESS. SORRY IF THIS IS in violation of any APPEALS COURTS Proceedings,
16 then I really don't know. All I care is why my son lost sleep waking up at night
17 thinking whether he will be able to LIVE or whether his daddy is SAFE at midnights.
18 HENCE, I MAKE THIS ENTIRE FILING ALONG WITH THE ATTACHMENTS
19 AND EVERY WORD FROM THE VERY START AND SUBSEQUENT
20 IMPLEMENTATIONS THAT CONTINUE TO FAIL WITHOUT ANY
21 ACCOUNTABILITIES ON ANY...I REQUEST THE ACCOUNTABILITIES BE
22 REVIEWED FIRST, SINCE THIS IS MY DEATH STATEMENT coming from not as
23 weak but a determined PARENT WHO DECIDED TO STAND NEXT TO THE

1 CHILD FOR HIS UPBRINGING AS PROMISED. THE PRIMARY and ENTIRE
2 RESPONSIBILITY OF ANY SECURITY NEEDED TO CURB ANY DEATH TO ME
3 OR MY CHILD OR FAMILY AS AUTHORIZED AND UPDATED FROM TIME TO
4 TIME is on the COUNTRY USA and the Sovereign state of the location where I reside
5 from time to time. This is in my attempt to save a child, whose interests were supposed
6 to be the primary focus of any PARENTING PLAN OR CHILD SUPPORT ORDERS,
7 and not an adult or party thereof...which a clear violation of LAWS as I Perceive is or
8 as observed since beginning. Now I am the witness to such observations and seeking
9 witness protection prior to elaborating more and more, if not already proved with one
10 two simple points as in above bullets. Such protection shall exist for ever until I feel
11 comfortable otherwise.

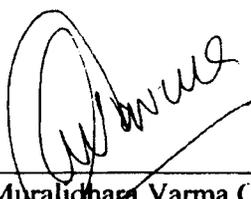
12 To express more of human thoughts and help further to set a context in no particular
13 order, I have created a document called ACitizensReview as attached here. It requires
14 special access permission that one can request, which I promise to respond within 24
15 hrs of request within next 3 days. However like to caution that it is an informal
16 document that is not expected to be reviewed under tight scrutiny of LAWS...as it is
17 like an exhibit only meant to ASSIST through expressions and FREEDOM OF
18 SPEECH that I never had a chance to exercise as a CITIZEN or that of PARENT.

19 I highly appreciate you permitting and accepting the email as form of serving...and I
20 am including the RESPONDENT as such in BCC to serve electronically and instructing
21 someone in USA to print and mail all documents attached along with this brief. So
22 please be considerate in case they miss an hour or two or even a day, since I consider
23 the party is served. Now to the fact that to whom and where to serve other respondents,

1 that onus is not on me as I am the one accusing them of wrong doing in favor of a
2 WOMAN who lied from time to time that they kept supporting. So even if a single lie
3 or a claim that I make in this partial attempt...as first brief and any as attached even to
4 help reserving the right to respond with my representative helping me how. Just to give
5 you some examples Mark Gouras, promoted kidnapping by releasing the documents
6 like passports without a written consent or court order as ORDERED on Aug 29th 2005
7 as attached. The Counsel Barth at trial said a child support is an income to the receiving
8 parent and even abused verbally, and when asked to clarify even courts didn't bother to
9 intervene and respect the respectful. Harry Slusher, the arbitrator while indicating the
10 arbitration is binding in nature failed to enforce and forced couple of times back and
11 forth communications for a motion to compel for arbitration, when all is sought is
12 clarification of what is that he has written...Finally he agreed as issues his opinion but
13 by then I lost about 3 wks time with my son and in those dates I planned. Make-up time
14 provided helps to prove, but where is the need for make-up when it can be enforced as
15 promised. Both the Arbitrator Harry Slusher and Mark Gouras, suggested even after
16 me questioning the overriding the nature of clauses that permit mother along to move
17 anywhere in USA without complying to relocation ACT even when in JOINT custody.
18 Now why is that used as a basis in making such clause for working people extending
19 equal right for both parents to be able to move as the nature and place of the job
20 moves...is not acceptable to COURTS...Who is in violation COURTS or the ones who
21 suggested it is legally valid to override with such clauses? I only allege here, prove
22 any is wrong and the onus is on RESPONDENT and I expect all is covered until I may
23 not question any further or even cause a reasonable doubt.

1 CITIZENS hurting themselves whether is RESPONDENT or APPELLANT, but
2 confident about APPELLANT to not succumb to the weak. Please attach this to the
3 Brief and I hope no one gets hurt in any way or form. Please do ensure as requested in
4 the brief that is a very informal CITIZEN cry for JUSTICE. I AM A NO LAWER
5 AND NO AMICUS CURIAE.

6 Dated this __12__ day of August, 2010.

7
8
9 

10
11
12 Muralidhara Varma Chiluvuri
13 Appellant, Pro Se
14 G-3, Abhiteja Platinum
15 Camelot Layout
16 Kondapur
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