

CERTIFICATE OF SERVICE

I certify that on 7th day of Dec, 2015, I caused a true and correct copy of this Reply Brief of Appellant to be served on the following in the manner indicated below:

Counsel for Ling D Wang

Name Lisa M Micheli

WSBA 21903

Address

1604 Hewitt Ave, Suite 516

Everett, WA 98201

U.S. Mail

Hand Delivery

email _____

Counsel/GAL

Name Susan Harness

WSBA 37108

Address

2720 Rucker Ave, Suite 102

Everett, WA 98201

U.S. Mail

Hand Delivery

email _____

Dec 7, 2015

Respectfully submitted,



Signature

Appellant

Percash Ramnath, PO Box 12052, Mill Creek, WA 98082

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I. ARGUMENT

The only signed document agreed upon by both parties is the CR2A dated May 2, 2014. Any other documents and arbitration beyond this signed date of May 2, 2014 has not been consented by the Appellant. The respondent's counsel, Lisa Micheli has manipulated and altered the CR2A agreement signed on May 2, 2014 and has deceitfully presented in the final dissolution documents. It took over 3 months for the respondent and her attorney to prepare and produce the final documents and when they did it was filled with discrepancies. The respondent and her attorney, Lisa Michelli deliberately altered the figures in the final documents to her advantage. The CR2A and the final documents presented by the respondent and her attorney do not match. There is a pattern of deceptive and manipulative tactics from the respondent and her attorney as evidenced in the case with false allegations and inflated spousal maintenance support and non-disclosure of spousal joint assets. The Appellant was not given the fair opportunity for a jury trial. The decree of dissolution was rendered without any counseling between the parties. And during the Appellant's period of absence the respondent and her attorney have committed perjury and deceitfully filed and issued court orders with false statements thereby depleting the appellant's life savings including 401K retirement, pension, stocks, fees and interest and rendering the appellant destitute. The respondent, Ling D. Wang had also depleted funds from the joint accounts earlier.

The Appellant filed the Notice of Absence and had served the respondent in an appropriate and timely manner. See prior Notice of Absence in Appendix (Exhibit A) filed by the counsels and I have followed the same protocol. The respondent's counsel,

Lisa Micheli has proven to be a LIAR as evidenced in the deposition of the respondent, child and spousal support using inflated figures, and the proceedings. Shame on such individuals in our society who has destroyed a family and has deprived a good and fit parent from seeing his daughter. The respondent's counsel deliberately asked the court to issue restraining order despite the Domestic Violence and CPS cases against the Appellant were dismissed with prejudice.

The Appellant did not receive the Order to Shorten Time ex parte and this is another example of the respondent's counsel doing things deceitfully. The counsel has been getting courts issue ex parte orders without giving the opportunity for the Appellant to respond in a timely manner. The Appellant filed a Motion to strike the presentation of Final Dissolution Documents and could not appear at the hearing since the respondent had not served the Appellant with the motion in a timely manner. See Appellant's motion to strike in Appendix (Exhibit 'B') with a clear indication of Appellant's inability to attend the hearing due to the short notice from the respondent and for trial continuance. The pro tem commissioner, Lee Tinney denied the respondent's motion to present final dissolution documents since it differed from the CR2A documents signed on May 2, 2014.

The Appellant asserts that he did not receive the trial confirmation date of August 26, 2014. How could he when the Appellant had served the Notice of Absence and was unavailable due to international assignment. So, why did the Snohomish County Superior Court of the state of Washington issue the decree of dissolution orders during my absence

despite my filing of Notice of Absence?

IMPORTANT NOTE: In Family Law cases, pursuant to SCLSPR 94.04(C)(1)(B), failure to confirm your trial date, appear on a confirmed trial date, or obtain order granting a trial continuance may result in dismissal of your case. Pursuant to SCLCR 40(d), it shall be the duty of each attorney of record or party pro se in a case set for trial to jointly or separately confirm, no sooner than 12 noon of the first court day of the week and no later than 12 noon of the last court day of the week two weeks prior to the trial date, in such written form as approved by the court. See Appendix (**Exhibit 'D'**).

Since I had filed my Notice of Absence and was not available and hence I had not confirmed the trial date, how did the court proceed with the trial in my absence? This is in direct conflict with the SCLSPR and SCLCR. The court has rendered erroneous decisions conflicting with the decisions of other appellate courts. The Writ of Garnishment Orders and Judgment to Pay were the result of these erroneous decisions by the Snohomish County Superior Court and it is utmost important for the Supreme Court to decide the questions involved and overrule the decisions by the lower court.

The respondent's counsel keep mentioning that the Appellant did not appear at the court hearings during the period of Appellant's absence until Dec 31, 2014. Isn't it straight

forward that the Appellant was not available during the notice of absence? I am surprised that the State of Washington allows such persons and counsels such as Lisa Micheli to practice law with no merits and allow the fabrication of lies and false allegations in the name of MONEY. These are bunch of liars exploiting the innocent victims and their families and children. How could a judge of the Snohomish County Superior Court appoint a designee for the Appellant and sign off on all documents without the consent of the Appellant and done in Appellant's absence? How could a judge make assumptions and anticipations about the Appellant's refusal? Could it be that the respondent's counsel, Lisa Micheli and the judge, Bowden have a common interest between them? These are the atrocities committed in this fraudulent case and I ask the Supreme Court for justice per my constitutional rights as the citizen of United States of America. I demand justice and I ask the Supreme Court to hold the perpetrators accountable and render the maximum punishment including debarment of counsel, Lisa Micheli. The Appellant filed the Notice of Appeal after returning from the international assignment in a timely and appropriate manner.

The spousal support and child support payment of \$4000 per month were based on inflated figures used by the respondent's counsel as clearly evident from the deposition taken under oath. Since the CR2A was signed on May 2, 2014, the respondent's counsel altered the figures and after 3 months filed the presentation of the final documents on July 31, 2014. I was out of the country for the trial date and had a Notice of Unavailability with the court. Apparently a trial happened and final documents were entered despite the order denying entry of final documents. I didn't find out about that

until months later when I returned from my international trip. Also while I was gone, a motion for contempt happened on September 22, 2014 and from that hearing stemmed the judgment award. I was devastated to find out that while I was gone, final documents were entered without my approval, hearings were held that resulted in large judgments against me, my bank accounts were drained, the overage I had paid to DCS for temporary maintenance was transferred to my spouse to pay off the judgment. I have been in a downward spiral of depression since then. I haven't been able to work due to the weight of what happened during the dissolution and with the entry of final documents and what I feel is a railroading of things against me. The parenting plan is way too restrictive although I paid all of the costs for a guardian ad litem and also have paid all of the costs for the reunification counselor. I do not agree with how the respondent and her counsel went about getting a judgment and wiping out bank accounts I had. I currently am not working and I do not have funds to live on without any income. My bank accounts are wiped out. I sold the investment property so I could receive funds to live on. Those funds were taken and put into the register of the court and subsequently awarded to the respondent. I respectfully request the reversing of all unjust court orders issued and that a fair jury trial be granted in the marriage dissolution which has been filled with lies and false allegations.

The Appellant, Percash Ramnath should be awarded his fees and compensation for purposes of responding to these appeals and court orders that were issued erroneously during the Appellant's absence. I ask for an equitable compensation for all the monies that have been garnished including my 401K retirement savings.

II. CONCLUSION

The Writs of Garnishment orders were the direct result of the erroneous court orders issued during the Appellant's absence. I have been deprived of my day in court and the respondent's counsel is aware that if given my chance in court all of her lies and manipulations will be exposed and that her law practice license will be revoked. Hence the respondent's counsel has been trying hard not to give me the opportunity for a fair trial in the court. The Appellant asks the Supreme Court to vacate all court orders issued during the Appellant's absence and that a fair jury trial be granted in order for justice to be served and the perpetrators be held accountable.

The Appellant, Percash Ramnath should be awarded his fees and compensation for purposes of responding to these appeals and court orders that were issued erroneously which are in conflict with the decisions of other appellate courts.

Relief requested:

- Vacate the Writ of Garnishment Order and Judgment to Pay directed to JP Morgan Chase Bank dated Dec 24, 2014.
- Vacate the Writ of Garnishment Order and Judgment to Pay directed to Wells Fargo Bank dated Dec 24, 2014.

- Return to the Appellant the sum of **\$25,000** that were illegally confiscated from the above bank accounts.
- Return to the Appellant the sum of **\$500,000** from the 401K retirement plan that was illegally transferred to respondent due to the unjust court orders and actions taken during my temporary absence.
- Return to the Appellant the sum of **\$300,000** from the company stocks that was illegally transferred to respondent due to the unjust court orders and actions taken during my temporary absence.
- Return to the Appellant the sum of **\$135,000** from the sale of the appellant's condo that was illegally disbursed to respondent due to the unjust court orders and actions.
- Return to the Appellant the sum of **\$26,000** that Division of Child Support has illegally confiscated from the appellant's roth IRA account and all bank accounts.
- Return to the Appellant the primary residence valued at **\$400,000** that was illegally transferred over to respondent due to these unjust court orders and actions.
- Return to the Appellant the sum of **\$125,000** from the IRA that was illegally transferred over to respondent due to these unjust court orders and actions.
- Return to the Appellant the automobile vehicles valued at **\$40,000** that was illegally transferred over to respondent due to these unjust court orders and actions.

- Return to the Appellant the sum of **\$55,000** from the joint accounts that were illegally withdrawn by respondent after eviction of appellant using false allegations.
- Compensate the Appellant the sum of **\$50,000** towards expenditure of time and money due to these unjust court orders and actions.
- Vacate the Decree of Dissolution dated Aug 26, 2014 and order a fair jury trial with a 50/50 disbursement split of property and assets and not 73/27 split as was done with manipulations and deceptions by respondent's lawyer, Lisa M. Micheli.
- Debarment of counsel, Lisa Micheli for her fraudulent methods of deception and perjury committed by having orders issued during Appellant's temporary absence and for altering CR2A documents.

This is a direct plea from a good and fit parent to the Washington State Supreme Court. Help reunite the father with his daughter immediately as over 3 years have gone by without any communications between the father and daughter. The respondent's counsel has deliberately got the court to issue restraining orders against the father using deceptive and manipulative tactics. The Snohomish County Superior Court has rendered me destitute with their corruptions along with the manipulative lawyers. I have been unable to work due to the severe trauma inflicted upon me due to this manipulative divorce. I am depending on food banks for food and shelter. See Appendix (**Exhibit 'C'**). I ask the Washington State Supreme Court to intervene and undo the

wrongdoings immediately and hold the perpetrators accountable. The Appellant, Percash Ramnath should be awarded his fees and compensation for purposes of responding to these appeals and court orders that were issued erroneously during the Appellant's absence. I ask for an equitable compensation for all the monies that have been garnished including my 401K retirement savings.

III. APPENDIX

Exhibit 'A'

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**SUPERIOR COURT OF WASHINGTON
COUNTY OF KING**

In re the Marriage of:

Percash Ramnath,

Petitioner,

and

Ling Wang,

Respondent.

NO. 13-3-00880-9

**NOTICE OF TEMPORARY
ABSENCE OF COUNSEL**

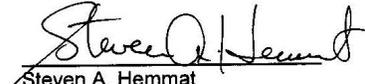
TO: THE CLERK OF THE COURT,
TO: Ling Wang
AND TO: Lisa Micheli, attorney for Ling Wang.

NOTICE IS HEREBY GIVEN that the undersigned attorney for the Petitioner Percash Ramnath will be unavailable and absent from his practice on November 4 – 8, December 23 – 31, 2013, and February 12 – 21, 2014.

It is therefore requested that no motions, discovery requests, or other matters in this case be brought or set during the period of this absence or immediately contiguous thereto.

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DATED on October 21, 2013.


Steven A. Hemmat
WSBA 16309
Attorney for Petitioner/~~Respondent~~

DECLARATION OF SERVICE BY MAIL

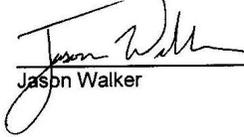
Under penalty of perjury under the laws of the State of Washington, I certified and declare that I have this day served a true and correct copy of the following documents:

Notice of Temporary Absence of Attorney

By depositing it in the United States mails by first class mail, postage prepaid, and addressed to:

Lisa Micheli
1604 Hewitt Ave. Ste 516
Everett, WA 98201

Dated this 21st day of October, 2013.


Jason Walker

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SUPERIOR COURT OF WASHINGTON
COUNTY OF SNOHOMISH

In re the Marriage of:

PERCASH RAMNATH,

and

LING D. WANG,

Petitioner,

Respondent.

NO. 13-3-00880-9

MOTION TO STRIKE HEARING ON
PRESENTATION OF FINAL
DOCUMENTS BY RESPONDENT &
MOTION TO CONTINUE/PROCEED
TO TRIAL

TO: THE CLERK OF THE COURT
TO: Lisa Micheli, attorney for Ling Wang
TO: Susan Harness, GAL

COMES NOW the petitioner, Percash Ramnath moves the Court for striking the hearing on the presentation of final documents by respondent. The petitioner also moves the Court for a continuance of the Trial.

The parties herein appeared at mediation on May 2, 2014. It has taken over 3 months for the respondent to prepare and produce the final documents and that too with discrepancies. The respondent has deliberately altered the figures in the final documents to her advantage.

MOTION TO STRIKE HEARING & MOTION TO
CONTINUE/PROCEED TO TRIAL

PERCASH RAMNATH
PO Box 12052
Mill Creek, WA 98082
(425) 876-8231

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There is a pattern of deceptive and manipulative tactics from the respondent and her attorney which is evidenced from the beginning of the case with false allegations and inflated spousal maintenance support and non-disclosure of spousal joint assets.

A continuance to trial will allow the petitioner, Percash Ramnath to properly prepare and sub-poena the declarants and make sure that the court has all the information and evidence before it, so an informed decision can be made regarding this case.

Furthermore, the petitioner, Percash Ramnath declares that he will not be able to attend the hearing scheduled on Wed, Jul 30, 2014 due to the unprecedented short notice from the respondent and due to prior work commitments.

DATED on Jul 29, 2014.



Percash Ramnath
Pro se
Petitioner

DECLARATION OF SERVICE BY MAIL

Under penalty of perjury under the laws of the State of Washington, I certified and declare that I have this day served a true and correct copy of the following documents:

Motion to strike hearing on presentation of final documents by respondent &
Motion to continue/proceed to trial

By depositing it in the United States mails by first class mail, postage prepaid and addressed to:

Lisa Micheli
1604 Hewitt Ave, Ste 516

Susan Harness
2720 Rucker Ave, Ste 102

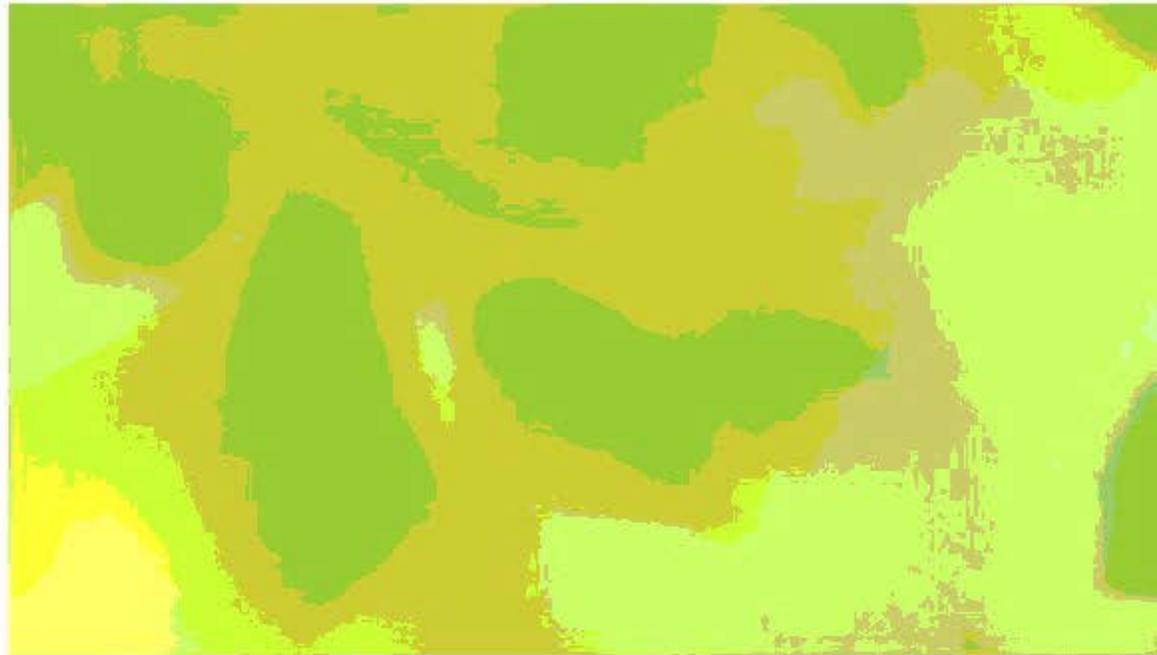
MOTION TO STRIKE HEARING & MOTION TO
CONTINUE/PROCEED TO TRIAL

Page 2 of 2

PERCASH RAMNATH
PO Box 12052
Mill Creek, WA 98082
(425) 876-8231

Exhibit 'C'

The Rent + Food Fund



 **SUPPORT** *(be the first!)*

I am a victim of unjust divorce in Washington State and have lost everything due to the corrupt courts and lawyers.

I have appealed this injustice on my own but have not been successful despite the lies and false allegations made by my ex-spouse. I have not seen my daughter for over 3 years and I have been drained mentally, emotionally and financially. Doesn't this sound too familiar? There are many such victims who have been forced out of their home and have been rendered destitute due to the corrupt family laws and court system aided by corrupt lawyers, commissioners, judges, and social workers. I am in desperate need to pay rent and eat food and help others in similar situations. Thank you for your generosity.

Supporter activity



What is GiveForward?

GiveForward is the first place to turn when you or someone you love is facing a challenge. It's the central rallying place for giving and receiving meaningful support. From sending a simple "Thinking of You" to raising money for out-of-pocket expenses, GiveForward empowers anyone to build a community and take action when it counts.

Oct 8, 2015

Respectfully submitted,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Signature

Appellant
Percash Ramnath, PO Box 12052, Mill Creek, WA 98082

Exhibit 'D'

STATUTES AND RULES

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

IMPORTANT NOTE: In Family Law cases, pursuant to SCLSPR 94.04(C)(1)(B), failure to confirm your trial date, appear on a confirmed trial date, or obtain order granting a trial continuance may result in dismissal of your case. Pursuant to SCLCR 40(d), it shall be the duty of each attorney of record or party pro se in a case set for trial to jointly or separately confirm, no sooner than 12 noon of the first court day of the week and no later than 12 noon of the last court day of the week two weeks prior to the trial date, in such written form as approved by the court.

Since I had filed my notice of absence and was not available and hence had not confirmed the trial date, how did the court proceed with the trial in my absence? This is in direct conflict with the SCLSPR and SCLCR. The court has rendered erroneous decisions conflicting with the decisions of other appellate courts and it is utmost important for the US Supreme Court to decide the questions involved and overrule the decisions by the lower courts.