Supreme Court of the State of Washington, No. 1040466

Division I, Court of Appeals No. 862936-I

SUPREME COURT OF THE STATE OF WASHINGTON

In re:

SHANNON HENERY,

Petitioner/Appellant

v.

WALKER HAGIUS,

Respondent/Appellee.

ON REVIEW FROM THE SUPERIOR COURT
OF THE STATE OF WASHINGTON, COUNTY OF KING

Cause No. 21-3-00678-7 SEA

ANSWER TO PETITION FOR REVIEW TO WASHINGTON STATE SUPREME COURT

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Washington State Opinions

Revised Code of Washington Statutes

Superior Court Rules

Rules of Appellate Procedure

I. INTRODUCTION

This answer comes before the Court to defend against a frivolous Petition for Review, another baseless action amongst many intransigent filings. Appellate failed to establish any appreciable error by the trial court in their multiple briefings, the Court of Appeals validly denied this appeal on January 27, 2025. Appellate is exceeding Civil Rule 11 with this petition. Appellate has continually sought frivolous appeals in retaliation for the award of property received by Appellee upon dissolution. Appellate rests their arguments on a fault claim (Appellee is not entitled to the property and interest he was awarded by the trial court because of domestic violence findings), something categorically forbidden in Washington. Appellate further rests their appeal on a false equivalency which the Court of Appeals was correct to dismiss – Appellate alleges that enforcement of any court orders compelling her to act are domestic violence. The Court of Appeals footnote regarding this issue is concise and highly material. Appellant omits a material portion of the footnote engaging in salient analysis, as Appellant is displeased with the conclusion:

> *"We reject Henery's claim that the revision court (1) "inconsistently and inequitably" enforced the dissolution court's orders, (2) failed to meet its "obligation not to*

> *participate in or facilitate abuse," and (3) resolved the motion before it on the "narrowest technicalities available without addressing domestic abuse." The revision court's order was based on the terms of the unappealed final dissolution orders, not "technicalities". Those orders included findings of abuse, and imposed restrictions and limitations on Hagius's conduct in line with those findings. Although Henery now asserts that Hagius's conduct warranted a greater offset against the equalization payment, the court granted an offset in the amount Henery requested. The suggestion that the superior court facilitated abuse or ran afoul of our state's policies concerning domestic abuse simply by enforcing the dissolution court's order as to the division of property and interest on the transfer payment is wholly unwarranted.*

FN 6, Pages 11 & 12 of Opinion from Division I, Court of Appeals Issued on January 27, 2025. Appellate even accuses both the trial and appellate courts of engaging in domestic violence by denying Appellant's frivolous appeal and enforcing the dissolution orders. There was no summary dismissal of the Appellant's appeal. Appellant asserts that domestic violence findings make Appellant immune to compliance with court orders, or financial enforcement mechanisms associated therewith. Appellant is attempting to further delay compliance with valid court orders. Appellant brings forth a completely impermissible legal doctrine, and demands it be implemented or those judicial officers who fail to do so are engaged in domestic violence. Appellant's petition must be denied, and Appellee awarded fees for engaging with another intransigent filing.

II. ISSUES BEFORE COURT & ANSWERS THERETO

The issues before the Court on this Answer to Petition for Review are:

A. Is there a substantial public interest in allowing a litigant to create a legal doctrine which is statutorily prohibited? **NO.**

B. Is the Court at any level engaged in domestic violence? **NO.**

C. Did the Court of Appeals provide the correct rulings in the Opinion and Motion to Deny? **YES.**

D. Is Appellee entitled to fees for this answer to the petition? **YES.**

III. STATEMENT OF THE CASE & RESPONSE THERETO

Appellant sets forth a Statement of Fact in her Petition for Review of ten pages. Of those ten pages, less than three are material. As with Appellant's opening brief, there is, "extensive discussion of facts that are not relevant to the procedure and issues presented for review." The Court of Appeals was justified in issuance of both the Opinion on January 27, 2025 and Order Denying on March 5, 2025.

The dissolution was filed by Appellant on February 5, 2021. Clerk's Papers (CP) 2-3. The trial court found February 5, 2021 to be the date of separation, despite claims by Appellant that the date of separation was March 30, 2020, attempting to secure a disproportionate amount of

marital property. CP 2-3. The parties had a trial on July 18 through July 25, 2022, wherein they both testified, as well as five (5) other witnesses, including a financial analysis expert. CP 1. Following trial, but prior to the final orders being entered on November 18, 2022, Appellant listed their residence (236th Avenue in Redmond, WA) for sale. Supplemental Declaration, SN#265, pg. 3; Declaration of Cobbin, SN#282. Appellant did so freely, and prior to final orders. Amongst the pertinent final findings, is the language related to Fidelity IRA Acct 9194. CP 6-7 & 17 resolve in favor of Judge Lapin's interpretation of Judge Segal's intent. CP 6-7 lists the value of the account at $326,981.73 and that Appellee should receive the net present value as of the date of separation. *Id.* The mentioned Qualified Domestic Relations Orders effectuates the property exchange while allowing Appellant to retain ownership of the Fidelity account itself. Merely because there is a value listed on CP 17 regarding the value of the Fidelity account, does not change the rest of CP 17. The spreadsheet also listed a $0.00 interest in this account by Appellant. CP 17. This is unambiguous. Judge Lapin's award of the entire account and all interest accrued is consistent with Appellee receiving the entire value of the account, as Judge Segal ordered on November 18, 2022 because at no point did the orders ever list any amount or value of the Fidelity IRA Acct 9194 as distributed to Appellant. CP 6-7, 17.

Following entry of final orders, Appellant failed to comply with any of the property division provisions such as signature of a quit claim deed (CP 4-6), or transfer of the Fidelity IRA (CP 6-7). Despite such violations, Appellant sought a myriad of post-trial relief such as contempt, a motion to restrict abusive litigation, and motion for immediate restraining order. *Motions,* SN#231 -#233. Appellee filed a response in May 2023, challenging all claims. *Response,* SN#248.

On May 25, 2023, Appellant sold their home in Redmond, WA previously marketed for sale on September 16, 2022, but not awarded until November 18, 2022. *Responsive Declaration,* SN#267, Exhibit 1. Appellant claimed a forced sale, due to Appellee, however Appellant failed to explain how Appellee's non-compliance with final orders not yet issued by the Court, forced Appellant to market their home for sale in early September 2022, or keep it on the market until May 2023. Nor did Appellant articulate how Appellee was culpable for external market forces such as market interest during that period. Judge Lapin had similar questions about Appellee's culpability for external market forces that also went unanswered by Appellant, or it was otherwise confirmed that the culpability was beyond Appellee. Verbatim Report of Proceedings (VR) Pages 59-60.

Appellant's motion for contempt was denied on July 24, 2023. *Findings and Conclusions,* SN# 312. Appellant's motion for restriction of litigation was denied on August 2, 2023. *Order Denying*, SN#323. Appellee field a Motion to Enforce on August 31, 2023. CP 24-31. Appellee asked the Court to enforce the final dissolution orders entered on November 18, 2022. This relief included Appellant signing a quit claim deed, Appellant tendering $203,339 as part of the equalizing payment upon dissolution, along with interest for that payment, transfer of entire Fidelity IRA, appointment of a special master if necessary, and payment of Appellee's fees for bringing an enforcement motion. CP 24-31. Appellant was intransigent, and forcing the return to Court was unnecessary. CP 1-17, 24-31.

Not until Appellant's response to the enforcement motion on September 14, 2023, did Appellant provide any intent to comply with court orders, ten months later. On September 22, 2023, the Court ruled on enforcement. CP 86-88. On October 2, 2023, Appellee reconsidered. CP 89-96. Reconsideration was decided on December 18, 2023. CP 229-233. Appellee revised on December 27, 2023. CP 234-244. Appellant responded on January 4, 2024. CP 250-259. On January 26, 2024, Judge Lapin entered the order on revision affirming the trial decisions. CP 276-727. Appellant sought a frivolous appeal. That appeal was correctly

denied by the Court of Appeals on January 27, 2025. That same decision was affirmed on March 5, 2025, by the Order Denying. This Petition for Review is intransigent and must be denied.

IV. ARGUMENT & AUTHORITY

A. NO ERROR BY COURTS IN FAILING TO PERMIT FAULT DOCTRINE

The entirety of Appellant's argument is based on penalizing Appellee for fault based on domestic violence findings. In Washington law, there is no concept of fault dissolutions. There is no basis to punish one party or reward another for conduct during the marriage. There certainly is not any grounds to award a disproportionate marital property to one party as a result of allegations of domestic violence either. That is exactly what Appellant asks. The Court of Appeals specifically noted that Appellant did not fail to receive the equitable relief she claims was not provided, but rather Appellant seeks even more equalization (than she originally requested), and the Court should have assessed a relief beyond what Appellant requested based on this inherent fault penalty that Appellant wants the Court to adopt now.

There was no legal authority of any kind to support such assertions. In fact, there is clearly no-fault doctrines or law in Washington, so the extensive discussion of domestic violence – in the

context of an action that Appellant voluntarily filed, is not material, and is only discussed to try prejudice the Court and pressure the Court to adopt the fault doctrine. The division of property in Washington is controlled by RCW 26.09.080. Which states the division is, “without regard to misconduct”. RCW 26.09.080. This is unambiguous language. There are no grounds on which the alleged misconduct of Appellee can be considered, particularly not on appeal. Appellant’s entire argument on why the Court should rule on her behalf is there are domestic violence findings, which in turn permits completely changing a division and award of marital property. Appellant is asking the Court to adopt a fault doctrine that both the trial and appellate courts refused to adopt. Appellant is seeking the Court to go beyond what Appellant sought as an equalization payment (the trial court granted Appellant the exact previous offset requested), and exceed that relief based on “equity”. Appellant claims that failure to go beyond Appellant’s requested relief is an act of ongoing domestic violence by the all courts. This was dismissed (correctly) as being untrue and disparate from reality. There was no domestic violence engaged in or furthered by any courts by enforcing valid dissolution orders. Appellant is openly requesting the Court contravene statute because the Court entered domestic violence findings at trial, and such frivolous legal positions must be denied.

Appellant cannot establish a legal doctrine specifically prohibited by statute.

i. Appellant attempts to assign fault to Appellee where none exists.

Beyond the deficient fault argument, Appellant attempted to blame Appellee for market downturns, rising interest rates, and Appellant's own decision to sell the home prior to being awarded the home. Appellee had no hand in these forces or control over these influences. Appellant placed the 236th Ave house on the market before the final trial orders were entered on November 2022. Appellant voluntarily listed the home before they received it by the Court. There would be no possible way for Appellee to have "forced" this sale, if Appellant had not even formally been awarded the property prior to the initial listing. Appellant's claim Appellee's actions undermined a refinancing are inaccurate too. Appellant at any time was able to sign a quit claim deed for the Ames Lake home and use that quit claim deed and the hold harmless provision of the final divorce orders to ensure their credit was insulated from any inability to pay the Ames Lake mortgage that Appellee might have experienced post-separation and post-trial. This in turn would have allowed open and free refinancing on the part of Appellant for the 236th Ave house. Appellant's reluctance to sign any

quit claim deed for the 236th Ave house, which would have insulated Appellant from any harm, confirms the detriment alleged did not occur. This filing is a reiteration of Appellant's distaste for Appellee and to relitigate the division of property, not a validly sought appeal. Appellant's intent is to take more than half of the community assets, and settle a personal vendetta against Appellee. This is clear from the below statement:

> "Not only should such behavior not be rewarded, but it should be *punished*." (Emphasis in the original).

Appellant's Opening Brief Page 59. Appellant is clearly acting in this appeal to punish and harm Appellee. Appellant wants to delay exchange of property, force Appellee to incur extensive legal fees, and otherwise seeks to make compliance with court orders as difficult as possible. Appellant is openly asking the Court to create a fault doctrine, and then punish Appellee under it. The Court at trial in 2022 already addressed and analyzed any domestic violence between the parties. The Court also entered appropriate limitations and restrictions regarding domestic violence. The division of property and enforcement thereof is completely separate from the consideration and analysis regarding domestic violence. RCW 26.09.080 makes clear that misconduct of any kind is not to be considered in division of property. Despite this, Appellant

continues to attempt to further this argument without basis. None of these arguments should be permitted.

B. NO MAGISTRATE ENGAGED IN, PERPETRATED, OR FURTHERED DOMESTIC VIOLENCE

Appellant continually provides an assertion (that is a material misrepresentation of the opinion by the Court), that all courts failed to consider Appellant's arguments regarding domestic violence and summarily ignored such concerns by a footnote. This is wholly untrue. The entirety of Appellant's Petition for Review fails to consider the rest of the footnote that Appellant conveniently omitted in their citation which is fatal to their entire petition. That key quotation is set forth on page five of this Answer.

It was clear that the trial and appellate courts did not find Appellant's arguments convincing, not that the trial and appellate courts were summarily denying it out of spite, error, or a legal failure. There was no inconsistency or inequitable enforcement of any orders. Nor did any court in this matter facilitate abuse. Nor were technicalities weaponized by any court in any way. All courts relied on the plain language of the unchallenged final dissolution orders and the valid interpretations thereof from the revision court. The final orders include

findings of abuse. Those findings are appropriately buttressed by restrictions and limitations on Appellee's conduct consistent with those findings as required by law. Merely because Appellant now asserts that Appellee's conduct warranted a greater offset against the equalization payment than Appellant already received, the court still granted an offset in the exact amount that Appellant previously requested. The baseless assertion that any magistrate facilitated abuse or ran afoul of our state's policies concerning domestic abuse by enforcing the dissolution order is unsupported by a single shred of legal authority. Simply because Appellant devoted a substantial portion of their materials to arguments, and claims that the Court did not find convincing and the Court did not feel compelled to spend the same amount of time and writing to deny Appellant's frivolous claims are certainly not any forms of domestic violence, nor the support or furtherance thereof. Appellant is accusing multiple sitting magistrates of engaging in domestic violence with no legal authority or factual basis to do so, and such claims are not only intransigent but strain the boundaries of Civil Rule 11. CR 11.

C. CORRECT RULINGS FROM ALL LOWER COURTS

i. No error in the award of one hundred percent of the value of the Fidelity IRA #9194 account to Appellee.

There was no error by Judge Lapin in awarding 100% of the value of the Fidelity IRA #9194 account to Appellee, including all gains and losses on the same property. Judge Lapin engaged in a clarification of existing property awards. There was no expansion or alteration of any entitlements. This revision was the correct interpretation of the trial order, in review of the relevant facts. Judge Lapin ruled that the difference between the $296,000 figure and the $326,000 figure discrepancy for the Fidelity IRA #9194 account, was based on an analysis by forensic accountant Michael Moss, who informed the trial court that an IRA was not equivalent to the real estate equity Appellant was being awarded because of withdrawal penalties and other conditions set on the property in the retirement account. This discrepancy of figures in the final orders (CP 6 & 17), saliently, was not an issue that Appellant raised at the issuance of the final orders. However, the language on CP 7 & 17, resolve and clarify any confusion. The Court was awarding the "net present value" of Fidelity IRA Acct 9194. CP 6 & 7. Net present value means the entirety of the account balance and that is the plain language meaning of that phrase without question. Appellant was able to retain the account because the funds would need to be transferred by Qualified Domestic Relations Order, but the entire value of the account was awarded to Appellee. This means Appellant clearly had no question

of what property or value thereof was to be awarded to each party, until there was vagueness and an opportunity to exploit that vagueness by filing repeated frivolous appeals. Appellant also does not bring this Petition for Review in good faith. Appellant is misstating the reality of the Opinion. There is clear intent about Appellee's total ownership of this financial account per CP 6-7, 17. Judge Segal gave Appellee the entirety of the account on the property division spreadsheet. CP 17. This also noted a zero percent interest or possession by Appellant. CP 17. There is no ambiguity in that – nothing means nothing, zero means zero. Judge Segal was intending to award the entire account to Appellee. Further, the larger sum appears in bold on CP 6 & 7. This was clearly not a mistake on the part of Judge Segal, and it was appropriate for Judge Lapin to adopt the same interpretation of CP 6-7, 17. Appellee was awarded the entire interest of this account, and anything short of that would be a violation of the court's orders and intent.

In the oral ruling on January 26, 2024, which is incorporated by reference on CP 276, and the verbatim report of proceedings, Judge Lapin was clear about the extent and understanding of his review of the decision. Judge Lapin's ruling and reasoning is found in the Verbatim Report of Proceedings (VRP) pages 61-66. Judge Lapin provided extensive evidence and consideration for how they were able to deduce

Judge Segal's intent, indicating that Judge Lapin would have contacted Judge Segal directly had it been possible but that the interpretation was unambiguous; Appellee was to receive the entire balance of the Fidelity IRA. VRP 61-66. The discrepancy of the figures listed was a scrivener's error. Judge Lapin also made clear that the form and content of Judge Segal's ruling, also demanded the appropriate statutory interest on the funds that Appellee was awarded but had not received. Given the plain language of the order, there is no conceivable interpretation for the final orders, other than Judge Lapins' ruling on January 26, 2024. CP 275-276. VRP 61-66.

Appellant's motivation for appeal is attempting to retain the three and a half years of gains on this Fidelity account since the date of separation in February of 2021. However, Appellant has attempted to package this as a fault argument and cite the Court's previous findings of domestic violence as a license to completely contravene Washington law. Appellant should not be unjustly enriched by receiving a separate property award in property they knowingly withheld since November 2022. Appellee had to bring a motion to compel compliance, this is hardly a situation wherein Appellant was acting diligently. Nearly all of the statement of facts and arguments that Appellant provides in this matter are assertions and claims that are totally irrelevant to the law and

facts regarding the division of property, interpretation of court orders, or compliance therewith. Appellant has engaged in a systematic pattern of levying unproven allegations and grandiose paranoid claims to try and create an impetus to prejudice Appellee before any judicial officer, and to offend procedural fairness. Appellant alleging that Judge Lapin was engaged in domestic violence by accurately interpreting the final orders of Judge Segal, is ludicrous. Appellant falsely accuses the appellate court of domestic violence by the same token. Notably, Appellant fails to explain how if that were the case, that the underlying order by Judge Segal wherein the property was originally awarded was not a form of domestic violence as those final orders were not appealed. Appellant's statement made on page 69 of their opening brief shows Appellant's intent to sway the Court rather than plead the matter on the merits:

> "Should this Court grant her request for remand, Dr. Henery respectfully requests that it provide clear instruction to the superior court that in its decision on any future motion, it must consider any request in the context of the extensive history of domestic abuse by Mr. Hagius."

Appellant's Opening Brief Page 69. No magistrate was ever engaged in any form of domestic violence against Appellant. The IRA account was correctly awarded by Judge Segal. Judge Lapin correctly revised the previous order on enforcement from Commissioner Lack to ensure that Judge Segal's original intent was met. The Court of Appeals

affirmed this decision correctly. Appellant is asking the Court to contravene clear intent of the Court's award of property, based on a legal doctrine that does not exist, predicated on a set of facts that were not true, and these requests must be denied.

ii. No abuse of discretion in awarding interest to Appellee given the equitable circumstances present in the motion; or failing to adopt the equitable relief sought by Appellant.

Appellant provides no evidence or convincing argument that award of interest on the non-transferred property is an abuse of discretion. Nor does Appellant provide an argument as to how there was error in failing to provide more equitable relief to Appellant in the equalizing payment than was already requested by Appellant and received. An abuse of discretion is not that a judicial officer does not disagree with your position. An error is that the Court made a decision that is completely unsupported or untenable on the facts and evidence. There was no abuse of discretion by any courts in this matter.

Furthermore, Appellant failing to receive their preferred relief on revision, is not an abuse of discretion. Particularly not when Appellant further received all equitable relief related to the equalizing payment they sought. However, that is essentially the character of this appeal by Appellant. It is a recitation of completely irrelevant materials regarding

domestic violence, ended by a request to upset long-standing court orders, and undermine valid interpretations of those same court orders, all based on Appellant disagreeing with the outcome of the award originally. This is not what constitutes an abuse of discretion. The Court is justified in denying all relief sought in the Petition for Review.

iv. All relief issued on January 26, 2024 was a sound resolution by Judge Lapin, including the award of fees to Appellee.

All relief issued by Judge Lapin on January 26, 2024 was appropriate relief, including the award of fees. There were no grounds to appeal the revision order and the same was found on January 27, 2025. There was even less merit in the Petition for Review requiring this Answer.

The appeal was frivolous for many reasons, chiefly the revision order was clarification of an ambiguous decree. *In re Marriage of Michael*, 145 Wn. App. 854, 859, 188 P.3d 529 (2008). There was no expansion or modification of rights. *Id.* The revision allowed the rights already provided by Judge Segal to be clearly articulated for the parties against the current factual landscape. *In re Marriage of Christel*, 101 Wn. App. 13, 22, 1 P.3d 600 (2000). Clarification is distinguished from modification, and there was no modification. *In re Marriage of Jarvis*,

58 Wn. App. 342, 792 P.2d 1259 (1990). Appellant was refusing to comply with final orders, so Appellee enforced the orders. The court made clear what would need to happen to comply with the court's orders and this is clarification. *Rivard v. Rivard*, 75 Wn.2d 415, 418-419, 451 P.2d 677 (1969). Appellant was acutely aware of Judge Segal's trial order regarding the transfer of the Fidelity IRA. Appellant deliberately drug their feet. The Court appropriately remedied this by assessing fees against Appellant. To allege that such fees were not supported by the record is untrue.

j. AWARD OF FEES NECESSARY GIVEN INTRANSIGENCE OF PETITION FOR REVIEW

The entirety of this Petition for Review, all arguments made therein or previously in Appellant's appellate briefings, are frivolous. Given the lack of supporting evidence, and general failure by Appellant to substantiate the claims made in the Petition for Review – that all previous courts engaged in domestic violence, Appellee asks the Court to issue a finding of intransigence against Appellant, and assess fees according to RAP 18.1. Appellee should recoup the entirety of their fees from the original appeal, and for this Answer. Appellant has raised Appellee's costs in this appeal, all with the intent of evading compliance with court orders. As Appellant is intransigent, their financial resources

are irrelevant. *In re Marriage of Bobbitt*, 135 Wn. App. 8; 30, 144 P.3d 306 (2006). Appellee was required to file both a responsive brief and answer to petition for review, engaging with all of Appellant's claims. Appellee could not choose to only engage with meritorious arguments or claims either as frivolous content dominates Appellant's filings. *In re Marriage of Burrill*, 113 Wn. App. 863, 873, 56 P.3d 993 (2002), *review denied*, 149 Wn.2d 1007 (2003). Appellant has engaged in foot-dragging, obstruction, the filing of frivolous actions, refusal to cooperate with Appellee, and other conduct which made the proceedings more costly and difficult such as filing of meritless appeals to delay enforcement or raise expenses. *In re Marriage of Greenlee*, 65 Wn. App. 703, 708, 829 P.2d 1120 (1992). *Gamache v. Gamache*, 66 Wn.2d 822, 829-30, 409 P.2d 859 (1965). Appellant's pattern indicates a intransigent course of conduct wherein Appellee is continually harmed by the bad faith litigation sought by Appellant, requiring Appellee to spend considerable resources to secure Appellant's compliance with orders entered for years now. Appellant is engaged in a continuing pattern of obstruction of court orders, and this Petition for Review is the latest in this line of attempts to undermine court orders, particularly those related to the division and award of property. *In re Marriage of Crosetto*, 82 Wn. App. 545, 550, 918 P.2d 954 (1996). The Court may also consider

the extent to which Appellee's legal fees were raised in direct correlation to this appeal process which was not sought in good faith. *In re Marriage of Wallace*, 111 Wn. App. 697, 708, 45 P.3d 1131 (2002), *review denied*, 148 Wn.2d 1011 (2003). Any unnecessary return to court, even those related to enforcement of final orders, if caused by a party, their conduct, or inaction – can be found to be intransigent. *In re Marriage of Fleckenstein,* 59 Wn.2d 131, 133, 366 P.2d 688 (1961). The Court can sanction a party for intransigent conduct. *Blair v. GIM Corp*., 88 Wn. App. 475, 481-82, 945 P.2d 1149 (1997). This appeal was intransigent. This was an attempt to establish a fault doctrine, in defiance of state law, in hopes of unsettling a longstanding division of property. In the course of this action, Appellant also baselessly accused multiple magistrates of engaging directly in domestic violence. Appellant indicts the bench without a scintilla of proof or evidence of such inequitable and prejudicial rulings or justification for even asserting that sitting judicial officers on multiple benches are engaged in domestic violence. Appellant makes repeated grandiose conspiracy claims that are not supported by law or evidence, and expects this to inflame the Court to act on their behalf. All prior courts correctly denied all of Appellant's relief on January 267, 2025. All of the requests, evidence, and claims in the appeal are intransigent by Appellant to be renewed again here now in

this Petition for Review. The Court should deny the appeal, and grant Appellee fees consistent with Rule of Appellate Procedure (RAP) 18.1.

This request satisfies and serves as the statement for a request for fees under RAP 18.1(a). Appellee has appropriately outlined a section within their Answer to the Petition for Review detailing the basis for fees, the request for fees, and the grounds to make an award of such fees. RAP 18.1(b). Upon a favorable ruling, Appellee would provide the appropriate cost bill under RAP 14. Appellant's conduct was intransigent as thoroughly detailed herein. The demand for fees is reasonable given that but for Appellant's filings, no additional filings would have been required of Appellee. Under the authorities cited herein and equities present, , Appellee should receive reasonable fees to cover the costs of this Answer and the Responsive Brief on Appeal.

V. CONCLUSION

This petition for review was merely an attempt to relitigate the dissolution and request relief that is patently inconsistent with the facts of the case and the laws of Washington while delaying enforcement of final orders. Appellant is materially misrepresenting the trial and appellate court decisions. Appellant is not being denied relief as someone who experienced domestic violence, and such a claim is

inaccurate factually and legally. Appellant should not be permitted to seek further unjustified appeal, establish a fault doctrine, and seek more equitable relief than already received. Appellant has been making severe accusations about many sitting magistrates, accusing them of committing domestic violence without any justifiable basis to do so. Appellee asks the Court at this time to deny all relief sought by Appellant in the Petition for Review. Given this was another intransigent action by Appellant, Appellee renews their request for fees now.

I certify that this Answer contains 4,999 words according to MS WORD consistent with RAP 13.4 & RAP 18.17(b), not including the cover page, table of contents, table of authorities, certificate of service, signature blocks, and this certification of compliance.

Respectfully submitted this 25th day of April, 2025 from Seattle, WA by:

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