No. 104211-6

SUPREME COURT
OF THE STATE OF WASHINGTON

LEE G. JORGENSEN,

Petitioner,

v.

NATALIE A. SEARS,

Respondent.

ANSWER TO PETITION FOR REVIEW

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A. Introduction.

In its unpublished opinion affirming the trial court's decision dismissing petitioner Lee Jorgenson's petition to dissolve his purported committed intimate relationship ("CIR") with respondent Natalie Sears, the Court of Appeals correctly held that the trial court's "findings as to the CIR factors are supported by substantial evidence in the record, and those findings, in turn, support its conclusion that the parties' relationship did not constitute a CIR." (Op. 10) Further, the Court of Appeals correctly held that "even if the trial court erred when it found that a CIR did not exist, Jorgensen's claim for an equitable division of assets would fail on multiple other grounds" (Op. 12) because substantial evidence supports the trial court's finding that "Jorgensen presented no evidence of the value of any asset 'at any time,' for the court to make such a determination." (Op. 11)

The Court of Appeals also properly affirmed the trial court's "trial management" decisions challenged by Jorgensen on appeal as being well within the trial court's discretion to make. (Op. 13, 16, 18) Finally, the Court of Appeals properly rejected Jorgensen's claims of bias by the trial court when it held that "Jorgensen identifies no affirmative evidence of actual or potential bias." (Op. 19)

Jorgensen's petition asking this Court to review the Court of Appeals' thoughtful and well-reasoned decision must be denied as it raises almost exclusively factual issues that were properly addressed by the trial court and affirmed by the Court of Appeals as being supported by substantial evidence. As there is no basis for review of the Court of Appeals decision affirming the trial court's fact-based, discretionary decision under RAP 13.4(b), this Court should deny review.

B. Restatement of the Case.

The Court of Appeals' opinion accurately recites the facts of the case (Op. 2-5)[1] which are summarized here:

1. Sears and Jorgensen met in 2005.

Sears[2] and Jorgensen met in Seattle in 2005. (Op. 2; RP 423) At the time, Sears was married and living with her husband in Sammamish. (Op. 2; RP 597) Jorgensen meanwhile split his time between his home in Chelan and Seattle, where the boat on which he worked as a deckhand was moored. (Op. 2; RP 147, 152-53; CP 397)

When they met, Sears owned and operated her business, a boat detailing company called Deckhand Detailing, which hired Jorgensen as a boat detailer. (Op. 2; RP 213-14, 434; CP 1003) Around this same time, Sears converted Deckhand Detailing from a sole proprietorship

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[1] This Answer cites to the slip opinion.

[2] This Answer refers to the respondent by her former surname in accordance with the Court of Appeals' opinion and the pleadings in the trial court.

to a limited liability company ("LLC") naming herself as the sole member and manger. (Op. 2; RP 424)

2. Sears acquired the assets that Jorgensen claims as "community-like" property while she was still married to her former husband, and before Sears and Jorgensen started living together.

By early 2006, the relationship between Sears and Jorgensen became romantic. (Op. 2; RP 433) In the early part of the relationship, Jorgensen proposed marriage to Sears, who initially accepted the proposal, but then "quickly" retracted her acceptance. (Op. 2; RP 363-64; CP 1000)

Despite her relationship with Jorgensen, Sears remained married to her husband; she lived with her husband, traveled with him internationally, and tried to reconcile her marriage by engaging in marriage counseling. (Op 2; RP 237; 259) In December 2006, Sears and her husband even purchased a cabin together in Cle Elum. (Op. 2; 251-52, 264) During this period, Jorgensen was

primarily living in Chelan but would return to Seattle periodically and sometimes stayed with Sears at her townhome when her husband was away. (Op. 2; RP 270, 534-35)

As Sears's attempts to reconcile her marriage eventually failed, she and her husband petitioned for dissolution in late 2007. (Op. 2; RP 259) In January 2008, while her dissolution was pending, Sears purchased a condo in the Queen Anne neighborhood in Seattle, using separate funds and a loan co-signed by her husband. (Op. 2; CP 1002; RP 505) Sears's marriage was dissolved in February 2008 (Op. 2-3; RP 249) and she was awarded the Cle Elum cabin, the Queen Anne condo, and her business Deckhand Detailing. (Op. 3; RP 601; CP 1103)

3. Sears and Jorgensen started living together in July 2008, after Sears' divorce was finalized. Any "marital-like relationship" between the parties was short-lived due to Jorgensen's infidelity.

In July 2008, after Sears's divorce was finalized, Jorgensen and Sears began living together full time, primarily staying at Sears's Queen Anne condo. (Op. 3; RP 534-35; CP 1004) During their cohabitation, Sears alone paid all the household expenses, including the mortgages and utilities for both the Cle Elum cabin and the Queen Anne condo. (Op. 3; RP 564, 566-67, CP 1005)

The parties' relationship was marked with instability because of Jorgensen's infidelity in 2009 and 2014. (Op. 3; RP 42, 48-51, 75-76, 347-49, 460) While Jorgensen downplays the impact of his infidelity, Sears and Jorgensen, for the most part, were no longer intimate after 2014, and all intimacy ended by 2017. (Op. 3; RP 308, 460, 569)

In 2019, Sears and Jorgensen ended their relationship. (Op. 3; RP 492) Jorgensen began staying at Sears's Cle Elum cabin, while she stayed in her condo in Queen Anne, and he stopped working for Deckhand Detailing. (Op. 3; RP 492) In January 2020, Sears told Jorgensen that "it was time for [them] to officially separate from each other" and she demanded that he vacate the Cle Elum cabin. (Op. 3; CP 2, 1002)

4. Jorgensen petitioned to dissolve the parties' alleged committed intimate relationship in April 2020.

On April 23, 2020, Jorgensen filed a petition to dissolve the parties' purported committed intimate relationship, alleging that he and Sears had been in a CIR from November 2006 until January 2020. (Op. 3; CP 1) Jorgensen alleged that Sears's three major assets—the condo, the cabin, and her business, which had formerly employed him—were community-like property and should be equitably divided. (Op. 3; CP 3)

Jorgensen separately brought a claim against Deckhand Detailing for unpaid overtime wages with the Department of Labor and Industries, which was settled after the Department found that Jorgensen was owed backpay. (Op. 3; CP 876, *see also* CP 787)

Sears was initially granted summary judgment dismissal of Jorgensen's CIR action in March 2021, as the court granting summary judgment concluded that the parties were not in a CIR as a matter of law. (Op. 4; CP 681-82) In March 2022, the Court of Appeals reversed the summary judgment order, holding that the court erred in concluding the parties were not in a CIR as a matter of law because "reasonable persons could reach different conclusions" as to the existence of a CIR. (Op. 4; CP 687[3])

[3] Citations to the opinion in the first appeal are to the slip opinion contained in the Clerk's Papers for this appeal. The opinion can also be found at *Matter of Jorgensen and Sears*, Cause no. 82556-9-I, 2022 WL 766220 (Mar. 14, 2022).

On remand, over a year after the mandate was issued, Jorgensen moved to bifurcate the trial on his CIR claim, asserting that the trial court should first address whether a CIR existed; and if a CIR was found, then the financial aspects could be addressed in a separate second trial. (Op. 4; CP 714) Jorgensen's motion to bifurcate was denied. (Op. 4; CP 764-65)

A little over a month before trial, Jorgensen—who had been representing himself—moved to continue the trial 90 days to accommodate his recently retained counsel. (Op. 4; CP 775) The trial court denied the motion to continue, and Jorgensen's counsel withdrew. (Op. 4; CP 848-49)

5. After a four-day trial, the court found that a CIR did not exist between Jorgensen and Sears and in any event, Jorgensen failed to present evidence of any community-like property.

During the trial on Jorgensen's CIR claim, the trial court granted Jorgensen additional time to examine his

witnesses. (Op. 4; CP 979-84) The trial lasted four days, during which time Jorgensen called nine witnesses including himself and Sears. (Op. 4)

Despite his motion for bifurcation being denied and being granted additional time at trial, Jorgensen presented little evidence about the financial aspects of his CIR claim. (Op. 4) What evidence he did provide was limited to the reputation and services of Deckhand Detailing. (*See, e.g.*, RP 139, 156) Although the parties had designated over 100 exhibits for trial, only 15 were admitted at trial, and all 15 were offered by Sears on cross examination. (Op. 4)

The seven non-party witnesses called by Jorgensen provided no further support for Jorgensen's claims other than their opinion that the parties had been a romantic couple, lived together, and that Jorgensen worked at Deckhand Detailing, none of which was disputed. (*See* Resp. Br. 25-27: summarizing testimony)

Jorgensen failed to prove many of the claims he made prior to trial. Jorgensen presented no evidence to support his claim in his petition that the parties' alleged CIR commenced on November 1, 2006. (*See* CP 1) In fact, he admitted at trial that the parties were "not constantly sleeping together in December of '06." (RP 556)

Jorgenson also admitted at trial that he could not prove his claim in opposing Sears's motion for summary judgment that he and Sears had been staying "nightly" at her cabin starting in March 2007. (*Compare* CP 401 *with* RP 504) Instead, the evidence at trial showed that Jorgensen maintained his residence in Chelan until July 2008, when he changed his address to Sears's condo in Queen Anne. (RP 534-35; Ex. 122) Jorgensen also acknowledged he could not prove his claim in opposing Sears's motion for summary judgment that it was he and Sears—not Sears and her then husband—that purchased

the Cle Elum cabin together. (*Compare* CP 400 *with* RP 524)

Meanwhile, Sears testified that until she and her husband agreed at the end of 2007 to file for divorce, she had not fully given up on her marriage. (RP 249, 259) Even after she and her husband filed for divorce, Sears testified that she did not view her and Jorgensen to be in a committed relationship. (RP 295) As the only assets that Jorgensen claimed were community-like assets were acquired prior to Sears's divorce from her husband and before the earliest date that Jorgensen could establish the parties began living together, Sears asserted these assets were her separate property. (RP 585-86)

After Jorgensen rested his case, Sears moved for dismissal under CR 41(b)(3). (Op. 4-5; RP 585) In its role as "trier of fact, the Court weighed the evidence and made a factual finding that Jorgensen failed to come forth with credible evidence of a prima facie case" that he was entitled

to relief under the CIR doctrine. (CP 992) After addressing the evidence on each of the CIR factors (RP 597-601), the trial court concluded that a CIR "did not exist between the parties." (CP 992) The trial court further found that even "if a CIR existed, Jorgensen did not prove the existence of (a) any property acquired during the relationship or (b) each party's interest in the property." (CP 993) The trial court granted Sears's motion and entered its written order dismissing Jorgensen's petition on August 22, 2023. (CP 992-93)

6. The Court of Appeals affirmed in an unpublished opinion.

Jorgensen appealed for a second time challenging several of the trial court's findings, several of the trial court's trial management decisions, and arguing that he was denied a fair trial because of his status as a pro se litigant and bias. (Op. 1; CP 994-97) The Court of Appeals affirmed in an unpublished opinion, holding that

"[s]ubstantial evidence in the record supports the trial court's findings and Jorgensen's other assertions of error do not provide a basis for reversal." (Op. 1)

C. Argument Why the Court Should Deny Review.

This Court should deny review because Jorgensen fails to show that the Court of Appeals' unpublished opinion meets any of the requirements for review under RAP 13.4(b).

1. The Court of Appeals' unpublished opinion does not conflict with any of the published appellate court opinions addressing the CIR doctrine and the factors that courts must consider.

This Court should deny review because the Court of Appeals' unpublished opinion does not conflict with a published opinion of this Court or the Court of Appeals. RAP 13.4(b)(1)-(2). Contrary to Jorgensen's assertion (Pet. 16), the Court of Appeals opinion does not conflict with either *Connell v. Francisco*, 127 Wn.2d 339, 898 P.2d 831

(1995) or *Morgan v. Briney*, 200 Wn. App. 380, 403 P.3d 86 (2017), *rev. denied*, 190 Wn.2d 1023 (2018), both of which, like the Court of Appeals opinion here, affirmed a trial court's CIR decision, as being supported by substantial evidence. Nor does the Court of Appeals opinion here conflict with this Court's decision in *Marriage of Pennington*, 142 Wn.2d 592, 14 P.3d 764 (2000) (Pet. 16), which held that the two relationships at issue in that case were not CIRs warranting an equitable division of property.

Jorgensen's argument that the Court of Appeals' opinion in this case conflicts with its unpublished opinion in his first appeal (Pet. 6, 17) does not warrant review. Leaving aside that an unpublished opinion cannot create a RAP 13.4(b)(2) conflict, the opinions do not in fact conflict.

The first appeal *did not* establish that "the Court found in 2022 it was, indeed, a CIR we were in for twelve years, and the facts and evidence in the record supported

it." (Pet. 14) The Court of Appeals reversed the summary judgment order dismissing Jorgensen's CIR claim, not because it concluded the parties were in a CIR, but because it held the trial court erred by deciding the issue "as a matter of law." (CP 694) In light of the summary judgment standard requiring the court to "consider all facts submitted and all reasonable inferences from those facts in the light most favorable to the nonmoving party," which was Jorgensen, the Court of Appeals held the trial court erred in granting summary judgment since "reasonable persons could reach more than one conclusion about whether the parties' relationship was a CIR." (CP 694)

The decision being reviewed in this appeal is not on summary judgment, but after a trial, where the trial court, as "trier of fact . . . weighed the evidence and made a factual finding that Jorgensen failed to come forth with credible evidence of a prima facie case" establishing his claims that the parties were in a CIR, requiring an equitable division of

community-like assets. (CP 992) The standard of review for this appeal from an order entered after a trial is far more deferential to the trial court than in the first appeal from a summary judgment order, which was de novo.

Based on this standard of review, the Court of Appeals properly affirmed the trial court's decision when it held "the court's findings as to the CIR factors are supported by substantial evidence in the record, and those findings, in turn, support its conclusion that the parties' relationship did not constitute a CIR." (Op. 10) In doing so, the Court of Appeals considered the trial court's findings on each of the CIR factors described in *Connell*, *Pennington*, and *Morgan*. As this Court has held, "these factors are meant to reach all relevant evidence helpful in establishing whether a [CIR] exists. Thus, whether relationships are properly characterized as [a CIR] depends upon the facts of each case." *Pennington*, 142 Wn.2d at 602 (cited sources omitted).

The trial court's findings include: (1) that "the parties' cohabitation was not continuous" (Op. 7); (2) that the nature and purpose of the relationship did not establish that "it was a 'stable marital-like relationship for any specific period of time" (Op. 8); (3) that there was "limited pooling of resources and services" if any (Op. 9); (4) and that any "intent to have a permanent, committed relationship was neither sustained nor mutual." (Op. 9-10) After concluding that these findings were supported by substantial evidence, the Court of Appeals properly held that "those findings, in turn, support its conclusion that the parties' relationship did not constitute a CIR." (Op. 10)

Jorgensen seems to tacitly acknowledge that his argument falls short under the recognized CIR factors because he argues that there should be a "sixth factor/element" loosely related to principles of agency. (Pet. 27-28) However, as the five-factor test for a CIR described in *Connell*, *Pennington*, and *Morgan* is settled

law in this state, and was properly applied by the Court of Appeals in its unpublished opinion, review is not warranted.

As the Court of Appeals' unpublished opinion is wholly consistent with published appellate court opinions addressing the CIR doctrine, review is not warranted under RAP 13.4(b)(1) or (2).

2. The Court of Appeals' unpublished opinion affirming the trial court's fact-based decision as supported by substantial evidence does not raise an issue of substantial public interest.

This Court should also deny review because the Court of Appeals' unpublished opinion affirming the trial court's fact-based decision that Jorgensen was not entitled to relief under the CIR doctrine does not raise an issue of substantial public interest. RAP 13.4(b)(4). Jorgensen's arguments in his petition are devoted to relitigating the weight of the evidence and the trial court's finding that Sears was a credible witness. (Pet. 16-26) For instance,

Jorgensen argues that "[t]his was a preponderance of the evidence case won by a party to the cause without presenting any credible evidence as to whether or not a CIR existed." (Pet. 25, *see also* Pet. 12) However, this argument ignores that he, as the petitioner, failed to put on sufficient evidence establishing that a CIR in fact existed. Further, even if he did prove that a CIR existed, he failed to meet his burden to show that any of Natalie's separate property—the business, the Queen Anne condo, and the Cle Elum cabin—was actually community-like property, warranting an equitable division.

In seeking review of the Court of Appeals opinion, Jorgensen asks this Court "to examine this case in somewhat *de novo* fashion in the interest of justice." (Pet. 14, *see also* Pet. 29) But where the trial court has weighed the evidence and made "a factual determination that the plaintiff has failed to come forth with credible evidence of a prima facie case" under CR 41(b)(3), "appellate review is

limited to whether substantial evidence supports the findings and whether the findings support the conclusions of law. *Hendrickson v. Dep't of Labor & Indus. of State*, 2 Wn. App. 2d 343, 352, ¶23, 409 P.3d 1162, *rev. denied*, 190 Wn.2d 1030 (2018).

Jorgensen's arguments in support of review plainly overlook a core tenant of appellate review that, where a trial court's findings are being reviewed for substantial evidence, "the reviewing court will not substitute its judgment for that of the fact finder even though it may have resolved a factual dispute differently." *In re G.W.-F.*, 170 Wn. App. 631, 637, ¶17, 285 P.3d 208 (2012) (internal quotations and quoted source omitted). "Thus, [the reviewing court] defers to the trier of fact for resolution of conflicting testimony, evaluation of the evidence's persuasiveness, and assessment of the witnesses' credibility." *G.W.-F.*, 170 Wn. App. at 637, ¶37.

Here, the Court of Appeals properly affirmed the trial court's conclusion that a CIR did not exist based on its findings on each of the CIR factors that the Court of Appeals held were supported by substantial evidence. But as the Court of Appeals also recognized, even if the trial court erred in concluding that there was no CIR, Jorgensen's claim for an equitable division of property would fail as a matter of fact. (Op. 10-12) Jorgensen failed to prove that the three assets he sought to be equitably divided were acquired during the alleged CIR. (Op. 10) And even if "Jorgensen claimed an equitable ownership interest based on his efforts that added value to the business or Sears's real property, as the trial court noted, Jorgensen presented no evidence of the value of any asset 'at any time,' for the court to make such a determination." (Op. 11)

As the issues presented in the Court of Appeals' unpublished opinion are highly fact specific and do not

present issues of public importance that this Court must weigh in on, review is not warranted under RAP 13.4(b)(4).

3. The Court of Appeals' unpublished opinion does not present a significant question of law under the Constitutions of the State of Washington or of the United States.

Finally, this Court should deny review of the Court of Appeals' unpublished opinion because it does not present a significant question of law under the constitution. RAP 13.4(b)(3). Jorgensen alleges that the trial court's trial management decisions "impeded" "'Due Process of Law' under the fifth and fourteenth amendments." (Pet. 7) However, Jorgensen fails to identify how his due process rights have been violated by the trial court's wholly discretionary trial management decisions, as the Court of Appeals properly concluded. (Op. 12-19)

For example, on the issue of bifurcation, Jorgensen asserts that the "trial was to determine only if a CIR was existent or not" (Pet. 27), but this assertion is wrong. In

denying Jorgensen's motion to bifurcate, the trial court intended to handle the CIR claim in its entirety, which as the Court of Appeals highlighted, was necessary because "bifurcation is not favored, especially when, . . . some of the same evidence would be relevant to issues adjudicated in the proposed separate trials." (Op. 13, citing *Brown v. Gen. Motors Corp*, 67 Wn.2d 278, 282, 407 P.2d 461 (1965) (bifurcation is not appropriate when "the evidence bearing upon the respective issues is commingled and overlapping.")) This holding is particularly salient when it is clear that Jorgensen "failed to cogently explain the benefit of bifurcation" and because "there is no apparent reason why a bifurcated trial could have led to a more accurate resolution of the facts or why Jorgensen could have not presented expert testimony in a non-bifurcated trial." (Op. 13)

Similarly, the trial court's enforcement of time limits during trial was well within its discretion (Op. 16-18, citing

Stocker v. Univ. of Wash., 33 Wn. App. 2d 352, 359, ¶11, 561 P.3d 751 (2024)) This is particularly true when Jorgensen does not deny that he "had notice of the time limits" and that the trial court's allocation of time was "in line with the parties' pretrial estimates." (Op. 17; RP 326; CP 1072)

While Jorgensen claims that he had "more than 20 witnesses designated as those I might call to question for testimony" (Pet. 23), he never made an offer of proof as to what those other witnesses would have testified to that would be different from the testimony of witnesses he had already presented to the trial court thereby precluding review of that issue. *Estate of Bordon ex rel. Anderson v. State, Dep't of Corr.*, 122 Wn. App. 227, 246, 95 P.3d 764 (2004) (appellate review is precluded when proponent of evidence fails to make offer of proof), *rev. denied*, 154 Wn.2d 1003 (2005); *see also State v. Pierce*, 175 Wash.

523, 535, 27 P.2d 1087 (1933) (holding that there was no error because appellant failed to give offer of proof).

Indeed, Jorgensen appears to concede that an offer of proof would not change the Court of Appeals' decision since the witnesses he already presented at trial were presumably the most "credible" and "reliable" people to testify. (Pet. 24) And in any event, Jorgensen cannot show prejudice because, as the Court of Appeals emphasized, the trial court "granted additional time here, even though Jorgensen made no specific offer of proof and in spite of the fact that the record reflects Jorgensen's inefficient use of his trial time contributed to his perceived need for more time." (Op. 17-18)

Jorgensen challenges the Court of Appeals decision affirming the trial court's order denying him a continuance of the trial by suggesting the trial court acted capriciously, or in a biased manner in denying him a continuance. However, Jorgensen concedes that he "cannot say for

certain" if the trial court harbored any improper motive. (Pet. 11) Jorgensen's argument thus must fail because "[b]ias or prejudice on the part of a judge is never presumed and must be affirmatively shown by the party asserting it." *Rich v. Starczewski*, 29 Wn. App. 244, 246, 628 P.2d 831, *rev. denied*, 96 Wn.2d 1002 (1981); *Estate of Hayes*, 185 Wn. App. 567, 607, ¶113, 342 P.3d 1161 (2015) ("A judge is presumed to perform his functions regularly and properly, without bias or prejudice.").

As the Court of Appeals recognized, a review of the record reflects that there were indeed valid reasons to deny a continuance, including the fact that the "case had been pending since 2020, the parties had engaged in discovery in 2020, and opposing counsel was prepared to proceed." (Op. 15) Further, there was nothing in the record to support "an inference that the court failed to review the history of the case or failed to appreciate the nature and complexity" of the case before ruling on Jorgensen's motion. (Op. 15)

Lastly, Jorgensen claims that the Court of Appeals erred by deciding his case without oral argument. (Pet. 6) However, the Court of Appeals retains discretion to decide a case without oral argument. RAP 11.4(j). And because Jorgensen never moved in the Court of Appeals for oral argument, his claim has been waived. In any event, due process does not require oral argument on a written motion, rather "oral argument is a matter of discretion so long as the movant is given the opportunity to argue in writing [their] version of the facts and law." *State v. Bandura*, 85 Wn. App. 87, 92-93, 931 P.2d 174 (affirming a trial court's decision to deny a motion for arrest of judgment or new trial without hearing oral argument on the matter), *rev. denied*, 132 Wn.2d 1004 (1997).

As Jorgensen's due process rights were not violated by the Court of Appeals' decision affirming the trial court's discretionary trial management decisions without oral argument, review is not warranted under RAP 13.4(b)(3).

D. Conclusion.

Jorgensen's petition does not satisfy any of the conditions necessary for this Court to grant review under RAP 13.4(b) and accordingly, this Court should deny review.

I certify that this answer is in 14-point Georgia font and contains 4,402 words, in compliance with the Rules of Appellate Procedure. RAP 18.17(b).

Dated this 1st day of July, 2025.

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DECLARATION OF SERVICE

The undersigned declares under penalty of perjury, under the laws of the State of Washington, that the following is true and correct:

That on July 1, 2025, I arranged for service of the foregoing Answer to Petition for Review, to the Court and to the parties to this action as follows:

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DATED at Brooklyn, New York this 1st day of July, 2025.

/s/ Andrienne E. Pilapil
Andrienne E. Pilapil

SMITH GOODFRIEND, PS

July 01, 2025 - 10:06 AM

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