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SUPREME COURT
STATE OF WASHINGTON
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No. 1043708

IN THE SUPREME COURT
IN AND FOR THE STATE OF WASHINGTON

JENNIFER ASHLEY REEDAL,

Respondent,

v.

ADNAN ALI KHAKI,

Appellant.

RESPONDENT'S MOTION FOR DISCRETIONARY
REVIEW OF DECISION TERMINATING REVIEW
[treated as a PETITION FOR REVIEW](#)

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A. IDENTITY OF THE PETITIONER

Jennifer Reedal, Respondent and Petitioner, by and through attorney Sean M. Downs, asks this court to accept review of the decision of the court of appeals attached as “Appendix A” herein.

Appellant is seeking review of the court of appeals decision finding that the direct appeal was moot and that the matter could not be remanded to the superior court in order to make appropriate findings.

B. ISSUES PRESENTED FOR REVIEW

1. The court of appeals erroneously found that the direct appeal at issue was moot due to the underlying protection order supposedly being expired. The court of appeals was both factually and legally incorrect, as the protection order had been renewed prior to the court of appeals’ opinion and is in effect into the year 2027. Therefore, the direct appeal was not moot and the court of appeals should not have vacated the underlying protection order that was still in effect.
2. Even assuming *arguendo* that the direct appeal was moot, the remedy for a moot matter is to dismiss the appeal, not to issue an order to the underlying court where the appellate court has no jurisdiction due to

mootness.

C. STATEMENT OF THE CASE

On January 4, 2024, Jennifer Reedal filed a petition for protection order to protect her from Adnan Khaki. CP 1. Reedal was fearful of Khaki, as he had a violent past with his former partner where he had a current domestic violence restraining order. CP 4. Reedal was familiar with Khaki's ex-girlfriends who had made domestic violence complaints in the past. CP 10; RP-04/12/2024 at 19. Reedal was fearful about what might happen to her or her family if Khaki found out about her petition. *Id.*

There were serious concerns about Khaki's behavior, as he had been drinking heavily and abusing substances, which were a violation of his deferred prosecution for a criminal matter. CP 42. It was also concerning due to Khaki's diagnosed substance abuse disorder. CP 10. Khaki was so drunk in one instance that Reedal had to take his car keys away from him to prevent him from driving. *Id.* This did not prevent him from

continuing to drink and drive when around others and even when picking Reedal up in a vehicle he was driving. CP 44, 49. Khaki's chemical dependency was so severe that he was day drinking instead of attending work. CP 49. Khaki was consistently violating his court-ordered mandates and was essentially cheating the system to avoid sobriety. CP 42-43.

Reedal and Khaki had a previous dating relationship, wherein Reedal broke up with Khaki. CP 162. Khaki exhibited intense mood swings where he was verbally and emotionally abusive, which resulted in Reedal needing to attend therapy. CP 162. After the breakup, Reedal blocked Khaki on all levels except for email. RP-04/12/2024 at 17; CP 162. She told him that she did not feel comfortable speaking with him directly and would only communicate through a third party, which would be a lawyer or couples' therapist. RP-04/12/2024 at 27; CP 162. Reedal reminded Khaki of her request to not contact her directly. CP 162. Whenever Khaki became angry with Reedal,

he would threaten to cancel the medical insurance that they shared. RP-04/12/2024 at 18, 27.

After Reedal gave birth to her son, she was able to obtain her own insurance. RP-04/12/2024 at 21. Khaki was not listed as the parent of this child and therefore could not provide insurance for Reedal's son, so Khaki was attempting to get Reedal to commit insurance fraud to which she refused. RP-04/12/2024 at 21-22, 25-26. Khaki claimed to his insurer to still be living at the same residence as Reedal after their breakup, which was false. RP-04/12/2024 at 26. Even as of the date of the protection order hearing, Khaki had not filed a paternity petition to claim Reedal's five-month-old child as his own. RP-04/12/2024 at 18.

Reedal specifically told Khaki to stop contacting her multiple times and he would not relent. RP-04/12/2024 at 21, 23; CP 162-163, 169 (Exhibit G: it had been eight times that Reedal told Khaki to not contact her as of 10/21/2023). Khaki's repeated, unwanted contacts continued through all hours of the

day and night. CP 9, 164. The unwanted messages were increasingly paranoid, as Khaki claimed Reedal and Khaki's ex were colluding against him. CP 164. Khaki knew Reedal had blocked him on her phone. RP-04/12/2024 at 23. When Reedal reached out to Khaki via email, it was to tell him to stop contacting her. *Id.* She simply wanted to be left alone, but Khaki would not do so. *Id.* When Reedal would not respond to Khaki's emails, he would send more emails. RP-04/12/2024 at 34; CP 24-25. When Reedal would not respond, Khaki would even reach out to Reedal's mother and Reedal's work to attempt to contact her. CP 9, 24 (text message image); RP-04/12/2024 at 23, 34.

Reedal was in therapy to address the substantial emotional distress suffered from Khaki's continued harassment. RP-04/12/2024 at 18-19. Reedal went into therapy after the breakup. RP-04/12/2024 at 23, 24. Khaki's repeated unwanted contacts severely annoyed Reedal and caused her so much emotional distress that she had to discuss the harassment with

her therapist, who ultimately recommended petitioning for a protection order. RP-04/12/2024 at 22, 24. She feared continuing escalation from Khaki, especially after the birth of her son. RP-04/12/2024 at 19. She called the Vancouver Police Department to see what she could do to make this harassment stop. RP-04/12/2024 at 22.

Given the above, Reedal eventually had to petition for a protection order on January 4, 2024, as stated above. CP 28. On January 22, 2024, the superior court granted a temporary protection order, pursuant to RCW 7.105.305. CP 11. On April 12, 2024, the superior court held a hearing to determine whether a full protection order should be issued. CP 2; RP 13. On April 15, 2024, the superior court issued its findings and ordered a full protection order be issued with an expiration date of January 22, 2025. CP 4.

On November 22, 2024, within 90 days of the full protection order expiring, Ms. Reedal motioned the superior court to renew the protection order, pursuant to RCW

7.105.410, as Mr. Khaki had violated the protection order among other reasons. *See* Motion for Renewal of Protection (attached as “Appendix B”). On January 22, 2025, after a hearing, the superior court renewed the protection order for two years with the protection order expiring on January 22, 2027. *See* Order Renewing Protection Order (attached as “Appendix C”).

On March 10, 2025, after the superior court had already renewed the underlying protection order with a new expiration date of January 22, 2027, the court of appeals entered an opinion to vacate the protection order because the court of appeals assumed that the January 22, 2024 protection order was expired and no longer protected Ms. Reedal and therefore this matter was moot. *See* “Appendix A”. The respondent filed a motion for reconsideration, which was denied by the court of appeals. *See* Order denying motion for reconsideration (attached as “Appendix D”).

This motion for discretionary review follows.

D. ARGUMENT

1. Despite neglecting to include more robust findings of fact, the superior court properly exercised its discretion in imposing the protection order as there was abundant evidence of unlawful harassment.

Generally, whether to issue a protection order is reviewed for abuse of discretion. *Hecker v. Cortinas*, 110 Wn. App. 865, 869, 43 P.3d 50 (2002). “A trial court abuses its discretion when its decision is manifestly unreasonable or is based on untenable grounds or reasons.” *State v. Taylor*, 193 Wn.2d 691, 697, 444 P.3d 1194 (2019). “To conclude the trial court abused its discretion, the reviewing court must find no reasonable person would agree with the trial court’s decision.” *Wood v. Millionis Constr., Inc.*, 198 Wn.2d 105, 128, 492 P.3d 813 (2021). A reviewing court may not find abuse of discretion simply because it would have decided the case differently. *Gilmore v. Jefferson County Pub. Transp. Benefit Area*, 190 Wn.2d 483, 494, 415 P.3d 212 (2018). The trial court’s findings of fact are treated as verities on appeal, so long as they are

supported by substantial evidence. *In re Marriage of Katare*, 175 Wn.2d 23, 35, 283 P.3d 546 (2012) (citing *Ferree v. Doric Co.*, 62 Wn.2d 561, 568, 383 P.2d 900 (1963)). “Substantial evidence” is evidence sufficient to persuade a fair-minded person of the truth of the matter asserted. *Id.* Substantial evidence review requires the reviewing court to view the evidence in the light most favorable to the prevailing party, “a process that necessarily entails acceptance of the factfinder’s views regarding the credibility of witnesses”. *Freeburg v. City of Seattle*, 71 Wn. App. 367, 371-72, 859 P.2d 610 (1993). The reviewing court will consider all facts and reasonable inferences in the light most favorable to the nonmoving party. *Woodall v. Freeman Sch. Dist.*, 136 Wn. App. 622, 628, 146 P.3d 1242, 1245 (2006).

Because the trial court is in the best position to hear testimony and observe witnesses, the reviewing court does not decide the credibility of witnesses or weigh the evidence. *In re Dependency of Lee*, 200 Wn. App. 414, 434, 404 P.3d 575, 585

(2017) (citing *In re Dependency of M.P.*, 76 Wn. App. 87, 90-91, 882 P.2d 1180 (1994)). Determining credibility is a critical part of the fact finder's role. Fact finders consider many factors when determining whether evidence is credible, including demeanor, bias, opportunity, capacity to observe and narrate the event, character, prior inconsistent statements, contradiction, corroboration, and plausibility. Fact finders are in the best position to resolve issues of credibility and determine how much weight to give evidence because they see and hear the witnesses. *State v. Maxfield*, 125 Wn.2d 378, 385, 886 P.2d 123 (1994) (trier of fact is in better position to assess the credibility of the witnesses and observe the demeanor of those testifying); see also *Morse v. Antonellis*, 149 Wn.2d 572, 70 P.3d 125 (2003).

This general rule applies not only in traditional court settings but is equally important in administrative proceedings. *See Penasquitos Vill., Inc. v. Nat'l Labor Relations Bd.*, 565 F.2d 1074, 1078 (9th Cir.1977) (“[w]eight is given the

administrative law judge's determinations of credibility for the obvious reason that he or she 'sees the witnesses and hears them testify, while the Board and the reviewing court look only at cold records' ” (quoting *Nat'l Labor Relations Bd. v. Walton Mfg. Co.*, 369 U.S. 404, 408, 82 S.Ct. 853, 7 L.Ed.2d 829 (1962)); see also *In re Discipline of Whitt*, 149 Wn.2d 707, 721–22, 72 P.3d 173 (2003) (generally a hearing officer is in a better position to assess the credibility of a witness).

Witness demeanor is a crucial part of determining credibility. Demeanor relates to a person's “manner ... bearing, mien: facial appearance.” *Webster's Third New International Dictionary* 599 (2002). It is “the carriage, behavior, bearing, manner and appearance of a witness.” *Dyer v. MacDougall*, 201 F.2d 265, 268, 269 (2d Cir.1952) (“[t]he words used are by no means all that we rely on in making up our minds about the truth of a question that arises in our ordinary affairs, and it is abundantly settled that a jury is as little confined to them as we are”). A witness's demeanor includes the “expression[s] of his

countenance, how he sits or stands, whether he is inordinately nervous, his coloration during critical examination, the modulation or pace of his speech and other non-verbal communication.” *Penasquitos Village*, 565 F.2d at 1078–79. is often noted, appellate courts are reluctant to disregard fact finders’ determinations of credibility because appellate courts are unable to observe witness demeanor. *Fisher Props., Inc. v. Arden–Mayfair, Inc.*, 115 Wn.2d 364, 369–70, 798 P.2d 799 (1990); *State v. Zhao*, 157 Wn.2d 188, 202, ¶ 26, 137 P.3d 835 (2006) (appellate court defers to the trier of fact on issues of credibility); *In re Det. of Halgren*, 156 Wn.2d 795, 811, ¶ 33, 132 P.3d 714 (2006) (this court will not second guess the jury’s determinations on credibility in an SVP proceeding).

There are a myriad of instances that show Khaki’s words and actions directed towards Reedal constituted unlawful harassment. Instead of retelling the summary of facts section above, the appellant’s arguments will be addressed in the same order as argued in their brief.

- Appellant’s claim: “After the birth of their son, Mother alleged that the Father’s email communications caused her substantial emotional distress and constituted unlawful harassment.” Appellant’s Brief, p. 8.

Reedal suffered emotional distress prior to this timeframe. As noted in her “Exhibit A”, she noted that Khaki was emotionally abusive and she would no longer initiate contact with him unless it was through a third party. CP 165. By this time, Reedal had already had to call the police one of two times to address how to handle Khaki’s behavior. RP-04/12/2024 at 22.

- Appellant’s claim: “Washington statute defines what constitutes "unlawful harassment": a knowing and willful course of conduct directed at Mother which seriously alarms, annoys, harasses, or is detrimental to Mother and that serves no legitimate or lawful purpose.” Appellant’s Brief, pp. 10-11.

Reedal specifically stated Khaki’s contact with her was considered harassment and that he needed to stop. In October alone, Reedal counted eight different times she asked Khaki to

stop contacting her without lawyers or therapists and noted the dates. CP 168 (Exhibit G).

Reedal had blocked all forms of communication with Khaki outside of emails because she was afraid that he would terminate her insurance. Khaki knew that he was blocked on Reedal's phone so he would reach out to her via her work phone. CP 166 (Exhibit D).

- Appellant's claim: "mother initiates contacts not the father". Appellant's Brief, pp. 12-13.

Reedal's Exhibit A was a response from Khaki's previous emails that started on September 18, 2023. CP 165. This exhibit was a response by Reedal to Khaki's emails and she was telling him that she did not feel safe communicating directly with him. Reedal's declaration stated that Khaki then began reaching out to her on September 18, 2023 and sent several emails. On September 27, 2023, Reedal informed Khaki that she did not feel safe with their interactions and requested a third person to be present for any communications between

them moving forward. CP 162-175 (Exhibit A). Khaki ignored this request by emailing Reedal four more times on September 27th and the 28th, Reedal responded on the 28th by asking Khaki not to contact her. *Id* (Exhibit B).

Reedal also detailed in her declarations the specific dates she stopped initiating any form of communication with Khaki. Reedal also noted in her declarations and in court testimony that she had to remain civil to Khaki because she was pregnant and on his insurance. RP-04/12/2024 at 13. Khaki threatened to remove Reedal from his insurance and even had an email thread with the subject line pertaining to insurance cancellation. CP 170.

- Appellant’s claim: “Mother even initiated contact even after telling Father not to contact her.” Appellant’s Brief, p. 16.

Contrary to the appellant’s assertion, Reedal did not initiate conversations. She tried several times to ignore the emails from Khaki and, if she did, Khaki would keep sending Reedal emails and even reach out to her work. This is

documented in Reedal's exhibits K, L, and R. CP 171-175.

These emails were responsive to emails Khaki had sent Reedal.

She was not initiating the emails.

- Appellant's claim: there were no disrespectful or disparaging comments. Appellant's Brief, pp.17-18.

Khaki would email Reedal in the middle of the night about strange issues such as how she should sign her name. CP 172 (Exhibit N). Khaki contacted Reedal for multiple reasons outside of her son.

After Reedal's son was born she found out that both Reedal and her son could not be on Khaki's insurance. Reedal also informed Khaki that it was illegal to be on his insurance. RP-04/12/2024 at 21-22, 25-26. Khaki went on to ask Reedal to engage in committing insurance fraud. When Reedal refused to do this, Khaki asked his employer to remove Reedal from his insurance. *Id.*

It appears clear from the record and from reasonable inferences therein that Khaki wanted to leave Reedal on his

insurance after her son's birth because Reedal was her son's only legal parent. If Reedal was still considered Khaki's domestic partner then he could insure Reedal's son. Khaki repeatedly asked Reedal to lie to Khaki's employer which she refused to do.

- Appellant's claim: "no reasonable person could find, based upon the record before the trial court, that Father's contact with Mother would cause a reasonable person to suffer substantial emotional distress." Appellant's Brief, p. 26.

Reedal's Exhibit A specifically stated that Khaki was emotionally abusive. Reedal then articulated that Khaki was harassing her in Exhibit G. CP 162-175.

- Appellant's claim: "...Mother's proof of substantial emotional distress is not supported by substantial evidence." Appellant's Brief, p. 28.

Reedal's therapist was treating Reedal for mental health issues due to Khaki's behavior. RP-04/12/2024 at 22, 24. The therapist saw that Khaki caused Reedal such substantial emotional distress that the therapist suggested that Reedal get the authorities involved and to get a protective order. *Id.* As

stated previously, Reedal had to call police twice due to Khaki's behavior. RP-04/12/2024 at 22.

Moreover, Reedal found out after the birth of her son that it was illegal for her to be on Khaki's insurance since he did not live with Reedal. It caused Reedal substantial emotional distress not only because Khaki reached out to her incessantly and inappropriately, but he then proceeded to ask her to break the law and place her son illegally on his insurance.

Khaki harassed Reedal incessantly with no intent to father the child or claim paternity. Khaki stated in the trial court that he was in no rush to establish paternity, yet he now argues in his appellate brief that he chose to communicate solely because he wants to be part of his son's life. This is contradictory.

- Appellant's claim: "There were no threats. No attempts to bully Mother by Father. No use of vulgarities. No offensive language or gestures. Nothing that would offend a person of reasonable sensibilities. Instead, the communications from Father were professional, polite and cordial by Mother's own admission." Appellant's Brief, p. 33.

Khaki threatened to remove Reedal's health insurance while pregnant, especially when she wouldn't communicate with him. Khaki then went on to bully Reedal into trying to commit insurance fraud.

Additionally, Reedal never agreed that Khaki's interactions were polite and cordial. Reedal specifically stated in court: "I do not believe the contents in the emails are relevant on how polite he claims to be with me. The point was that I wanted him to leave me alone and he would not." RP-04/12/2024 at 21. This was not Reedal acknowledging that they were polite or cordial.

Even if the tone and tenor of some of Khaki's communications may have appeared to be "cordial" at times, this contact by Khaki was nonetheless unwanted and repeated even after Khaki was informed that contact was unwanted. Khaki was previously seen to be emotionally abusive to Reedal and others that Reedal was familiar with. His supposed

cordialness later does not obviate his prior emotional and inappropriate outbursts.

In summary of the foregoing, there was certainly enough evidence presented in the trial court to justify the imposition of the protection order. To find that the trial court abused its discretion, this court must find that no reasonable person would agree with the trial court's decision. *Milionis Constr., Inc.*, 198 Wn.2d at 128. The trial court's findings are considered to be true so long as there is substantial evidence viewed in a light most favorable to Reedal and all reasonable inferences drawn therein. *Freeburg*, 71 Wn. App. at 371-72; *Woodall*, 136 Wn. App. at 628. In the instant case, there were ample reasons for Reedal to be fearful of Khaki's behaviors: from his heavy drinking and putting Reedal and others at risk while driving -- to being verbally and emotionally abusive -- to threatening to remove Reedal from insurance while she was pregnant -- to pressuring Reedal to commit insurance fraud -- to continually contacting Reedal when he was informed not to -- to stalking

Reedal through others and at her work. The many months of trauma caused by Khaki necessitated discussions between Reedal and her therapist about the incidents. Seeking therapy as a result of emotional abuse strongly evinces that Reedal did indeed suffer substantial emotional distress. This distress was informed by Khaki's previous domestic violence against his exes. Khaki's frequent contacts served no legitimate or lawful purpose, as the verbal and emotional abuse would not be considered legitimate or lawful, nor would contacts regarding encouragement of insurance fraud. In short, the trial court did not abuse its discretion in imposing the protection order.

2. The issues presented in this case were not moot, as the superior court will rely on, and in fact has relied on, the underlying protection order in making a decision as to whether to renew it.

A case is moot if a court can no longer provide effective relief. *Orwick v. City of Seattle*, 103 Wn.2d 249, 253, 692 P.2d 793 (1984). An appellate court will dismiss an appeal when only moot or abstract questions remain or when the issues

raised in the trial court no longer exist. *In re Detention of M.K.*, 168 Wn. App. 621, 625, 279 P.3d 897 (2012). A case is moot when a controversy no longer lies between the parties, all questions are merely academic, or a substantial question no longer exists. *Pentagram Corp. v. City of Seattle*, 28 Wn. App. 219, 223, 622 P.2d 892 (1981).

If a superior court grants a protection order for a fixed time period, the petitioner may file a motion to renew the order at any time within the 90 days before the order expires. RCW 7.105.405(1). The motion for renewal must state the reasons the petitioner seeks to renew the protection order. *Id.* The petitioner bears no burden of proving that he or she has a current reasonable fear of harm by the respondent. RCW 7.105.405(3). The court shall grant the motion for renewal unless the respondent proves by a preponderance of the evidence that there has been a substantial change in circumstances and, for a domestic violence protection order, that the respondent proves that the respondent will not resume acts of domestic violence

against the petitioner when the order expires. RCW 7.105.405(4)(a). The superior court may renew the protection order for another fixed time period of no less than one year, or may enter a permanent order as provided in this section. RCW 7.105.405(8).

In the instant case, the direct appeal was not moot because the parties still to this date have a matter in controversy. Namely, the underlying full protection order was subject to renewal before the protection order expired. In fact, Ms. Reedal did timely motion the superior court for renewal of the protection order, which was granted.

By ordering the vacation of the underlying protection order that was renewed, the court of appeals' order has the effect of vacating the current renewal protection order that expires on January 22, 2027 as well. That would leave Ms. Reedal unprotected from harassment or domestic violence by Mr. Khaki. Ms. Reedal would be unable to seek the relief of a new protection order unless Mr. Khaki committed new acts of

harassment or domestic violence, therefore he would be free to contact Ms. Reedal at will even after she had previously suffered unlawful harassment.

The legislature has found that civil protection orders are essential tools that can increase safety for victims of domestic violence and unlawful harassment in order to obtain immediate protection for themselves apart from the criminal legal system. RCW 7.105.900(4). Victims are in the best position to know what their safety needs are and should be able to seek these crucial protections without having to rely on the criminal legal system process. *Id.* Vacating the underlying protection order in this matter would violate these legislative goals.

The court of appeals ruling provides domestic violence abusers the incentive to delay the appeals process for as long as possible when they notice an easily remedied procedural defect. For example, in the instant case, there was ample information in the record in which to affirm the superior court's finding that unlawful harassment occurred. Ms. Reedal, a *pro se* litigant,

would not have noticed that the superior court neglected to include more robust findings of fact in the issuance of the protection order. These are findings of fact could be easily made upon remand. The restrained party could then appeal the issuance of the protection order and delay the proceedings past the date of the expiration of the original protection order to then claim the matter was moot. By doing so, the court of appeals could erroneously find that the matter was moot and then vacate the protection order, regardless of if an extension of the protection order was entered, as if unlawful harassment did not ever occur. This is in direct conflict with the purposes laid out by the legislature as to why swift, immediate action is required to protect victims of domestic violence.

Given the foregoing reasons, the appeal was not and still is not moot. Therefore, the protection order should not have been vacated. Mr. Khaki is *still* currently restrained by the same protection order at issue in this appeal. The court of appeals should have addressed the parties' arguments on its merits

simply by remanding to the superior court in order to enter formal findings of fact.

Given the above, the court of appeals decision is in conflict with a decision of the supreme court, pursuant to RAP 13.4(b)(1). *See, e.g., Orwick v. City of Seattle*, 103 Wn.2d 249, 253, 692 P.2d 793 (1984) (a case is moot if a court can no longer provide effective relief). The court of appeals decision is in conflict with a published decision of the court of appeals, pursuant to RAP 13.4(b)(2). *See, e.g., Pentagram Corp. v. City of Seattle*, 28 Wn. App. 219, 223, 622 P.2d 892 (1981) (a case is moot when a controversy no longer lies between the parties, all questions are merely academic, or a substantial question no longer exists). Lastly, this issue is also a matter of substantial public importance, as the court of appeals' opinion incentivizes domestic violence abusers to game the appellate rules to be granted backdoor relief that they ordinarily would not be entitled to. RAP 13.4(b)(4). Accordingly, this court should accept discretionary review.

3. Even assuming *arguendo* that the direct appeal was moot, the remedy for a moot matter is to dismiss the appeal, not to issue an order to the underlying court where the appellate court has no jurisdiction due to mootness.

Generally, an appellate court will dismiss an appeal when the appeal is moot. *Harke v. Harke*, 29 Wn. App. 2d 866, 872, 543 P.3d 829 (2024). “When an appeal is moot, it should be dismissed.” *Klickitat County Citizens Against Imported Waste v. Klickitat County*, 122 Wn.2d at 631, 860 P.2d 390, 866 P.2d 1256 (1993); *State v. Deskins*, 180 Wn.2d 68, 80, 322 P.3d 780 (2014). Mootness is a jurisdictional concern and may be raised at any time. *Citizens for Financially Responsible Gov’t v. City of Spokane*, 99 Wn.2d 339, 350, 662 P.2d 845 (1983). Courts do not have inherent jurisdiction to exercise judicial power in cases where they lack subject matter jurisdiction. *Banowsky v. Guy Backstrom, DC*, 193 Wn.2d 724, 750, 445 P.3d 543 (2019); *In re Adoption of Buehl*, 87 Wn.2d 649, 655, 555 P.2d 1334 (1976).

If court of appeals actually believed that this matter was moot, it was required to dismiss the appeal as the remedy to the moot matter. The court of appeals should not have issued an order to vacate the underlying protection order when a matter is supposedly moot, as the court of appeals would not have jurisdiction to issue such an order in a moot case. The court of appeals cannot exercise jurisdiction over a matter that is moot, therefore it cannot issue an order to the underlying court that it lacks jurisdiction over. Moreover, if “no purpose would be served [to] remand” this supposedly moot matter then there would be no reason to vacate the underlying order. If Mr. Khaki were not restrained by a supposedly moot protection order, then there would be no remedy that the court of appeals could provide and the appeal should simply be dismissed.

The court of appeals lacks jurisdiction to issue an order to the lower court if this matter is moot. Therefore, the appeal should have been dismissed.

Given the above, the court of appeals decision is in conflict with a decision of the supreme court, pursuant to RAP 13.4(b)(1). *See, e.g., Klickitat County Citizens Against Imported Waste v. Klickitat County*, 122 Wn.2d at 631, 860 P.2d 390, 866 P.2d 1256 (1993) (“When an appeal is moot, it should be dismissed.”); *Banowsky v. Guy Backstrom, DC*, 193 Wn.2d 724, 750, 445 P.3d 543 (2019) (courts do not have inherent jurisdiction to exercise judicial power in cases where they lack subject matter jurisdiction). Lastly, this issue is also a matter of substantial public importance, as the court of appeals’ opinion incentives domestic violence abusers to game the appellate rules to be granted backdoor relief that they ordinarily would not be entitled to, as described in the previous section and as it relates to the current section. RAP 13.4(b)(4). Accordingly, this court should accept discretionary review.

E. CONCLUSION

Given the foregoing, the respondent respectfully requests that this court accept review of this matter.

DATED this July 21, 2025.

RAP 18.17 certification: This document contains 4,966 words.

Respectfully submitted,

s/ Sean M. Downs

Sean M. Downs, WSBA #39856
Attorney for Respondent/Petitioner
GRECCO DOWNS, PLLC
701 Columbia St. #109
Vancouver, WA 98660
(360) 707-7040
sean@greccodowns.com

CERTIFICATE OF SERVICE

I, Sean M. Downs, a person over 18 years of age, declare under penalty of perjury under the laws of the State of Washington that on July 21, 2025 I electronically filed the RESPONDENT'S MOTION FOR DISCRETIONARY REVIEW with the clerk of the court using the electronic filing system, which will send a copy to the following electronic participant: Collin McKean <collin@mckeanSmithLaw.com>, attorney for Appellant.

Dated July 21, 2025. Signed in Vancouver, WA.

s/ Sean M. Downs

Sean M. Downs, WSBA #39856

Attorney for Respondent/Petitioner

GRECCO DOWNS, PLLC

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(360) 707-7040

sean@greccodowns.com

APPENDIX A

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

JENNIFER ASHLEY REEDAL,

Respondent,

v.

ADNAN ALI KHAKI,

Appellant.

No. 86877-2-I

DIVISION ONE

UNPUBLISHED OPINION

FELDMAN, J. — Adnan Ali Khaki appeals an antiharassment protection order (AHPO) protecting Jennifer Ashley Reedal. Because the AHPO has expired, the appeal is moot. Although we generally dismiss appeals presenting only moot issues, we may consider issues that are of substantial and continuing interest. Here, we identify such an issue—the absence of required findings to permit appellate review—and vacate the AHPO on that basis.

Reedal filed a petition for a protection order after Khaki allegedly sent her numerous unwanted e-mails. The trial court held three hearings at which it heard testimony and argument regarding Reedal’s petition and related matters. At the conclusion of the third hearing, the court indicated it would review the evidence and stated, “I’ll make a written decision and issue it to both [of] you.” The court then issued its written decision, which states in relevant part:

Based upon the petition, testimony, case record, and response, if any, the court finds by a preponderance of evidence that the protected person (or petitioner on their behalf) has proved the required criteria for the following protection order under chapter 7.105 RCW.

[X] **Antiharassment Protection Order** - The restrained person has subjected the protected person to unlawful harassment.

Also relevant here, the order states that it “**is effective immediately**” and “**expiring January 22, 2025.**” This timely appeal followed.

Preliminarily, we must address whether this appeal is moot. “A case is moot if a court can no longer provide effective relief.” *Maldondo v. Maldondo*, 197 Wn. App. 779, 790, 391 P.3d 546 (2017). The expiration of a protection order generally means we cannot provide such relief, and a party’s challenge to the order is thus moot. *See Price v. Price*, 174 Wn. App. 894, 896, 902, 301 P.3d 486 (2013) (“Both protection orders have long expired; thus, Veronica’s challenges to these orders are moot.”). Here, the AHPO expired on January 22, 2025 and no longer restrains Khaki. Thus, as in *Price*, Khaki’s challenges to the AHPO are moot.

Addressing this issue, Khaki claims, “This case will not be moot even if the Court’s decision on this appeal occurs after the expiration of the civil antiharassment order. Resolution of this case in favor of Father will ‘clear his record’ and reputation which is sufficient relief to avoid a mootness issue.” In support of this argument, Khaki cites *Hough v. Stockbridge*, 113 Wn. App. 532, 537, 54 P.3d 192 (2002), *rev’d on other grounds*, 150 Wn.2d 234, 76 P.3d 216 (2003), which recognizes, “this court may decide a case, even if moot, where the matter is of continuing and substantial public interest.” To determine whether a matter satisfies this standard, we consider “(1) the public or private nature of the question presented, (2) the desirability of an authoritative determination for the future

guidance of public officers, and (3) the likelihood of future recurrence of the question.” *State v. Beaver*, 184 Wn.2d 321, 330, 358 P.3d 385 (2015) (alterations in original) (internal quotation marks omitted) (quoting *State v. Hunley*, 175 Wn.2d 901, 907, 287 P.3d 584 (2012)).

This public importance exception to dismissal on mootness grounds “has been used in cases dealing with constitutional interpretation, the validity of statutes or regulations, and matters that are sufficiently important to the appellate court.” *Id.* at 331. Here, one such issue that is sufficiently important to the appellate court to avoid dismissal on mootness grounds is proper compliance with the requirement that a trial court order granting a protection order include sufficient findings to permit appellate review. That question is public in nature (it transcends the parties in this proceeding), an opinion in this appeal is desirable to provide future guidance to public officers, and the issue may recur in the absence of appellate vigilance. We therefore address this issue despite the expiration of the AHPO.

Motions for an antiharassment protection order are governed by RCW 7.105.010(36)(a), which defines unlawful harassment as follows:

A knowing and willful course of conduct directed at a specific person that seriously alarms, annoys, harasses, or is detrimental to such person, and that serves no legitimate or lawful purpose. The course of conduct must be such as would cause a reasonable person to suffer substantial emotional distress, and must actually cause substantial emotional distress to the petitioner.

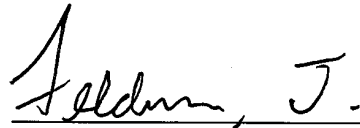
To enter an antiharassment protection order, as the trial court did here, the court must find each of these required criteria by a preponderance of evidence. *See Shinaberger ex rel. Campbell v. LaPine*, 109 Wn. App. 304, 307-08, 34 P.3d 1253 (2001).

Here, we are unable to review whether the trial court erroneously found these necessary elements—as Khaki argues—because the court did not enter the required findings. Under CR 52(a)(1), “[i]n all actions tried upon the facts without a jury . . . the court shall find the facts specially and state separately its conclusions of law.” Following a bench trial, we review a trial court’s findings of fact to determine whether they are supported by substantial evidence, and then review whether those findings of fact support the trial court’s conclusions of law. *Tiller v. Lackey*, 6 Wn. App. 2d 470, 484, 431 P.3d 524 (2018). Findings of fact “should at least be sufficient to indicate the factual bases for the ultimate conclusions.” *In re Det. of LaBelle*, 107 Wn.2d 196, 218, 728 P.2d 138 (1986). Where a trial court fails to enter the required factual findings, an appellate court “cannot review an assignment of error which requires consideration of whether there was sufficient evidence to support such findings.” *State v. Denison*, 78 Wn. App. 566, 570, 897 P.2d 437 (1995).

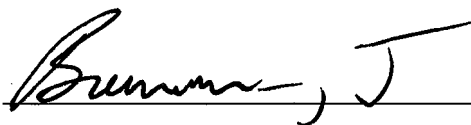
Contrary to the legal principles stated above, there are no written findings here. Instead, the AHPO states that the trial court has found by a preponderance of the evidence that “the protected person . . . has proved the required criteria” including that “[t]he restrained person has subjected the protected person to unlawful harassment.” Such “findings,” which largely recite legal requirements, are not “sufficiently specific to permit meaningful review.” *In re Dependency of C.R.B.*, 62 Wn. App. 608, 619, 814 P.2d 1197 (1991) (quoting *LaBelle*, 107 Wn.2d at 218-19). And while written findings “may be supplemented by the trial court’s oral decision or statements in the record,” *LaBelle*, 107 Wn.2d at 219, the trial court also did not provide any oral decision or findings.

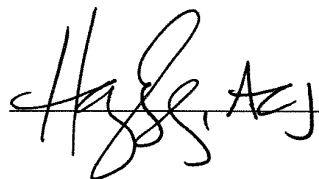
Where, as here, the factual record is disputed and formal findings of fact and conclusions of law are necessary for appellate review, remand for their entry would typically be appropriate. See *Little v. King*, 160 Wn.2d 696, 707, 161 P.3d 345 (2007). But in this case, no purpose would be served by remand because the AHPO has already expired and, thus, no longer restrains Khaki. We therefore vacate the AHPO—effectively providing the relief Khaki seeks despite the AHPO’s expiration—without addressing the parties’ arguments. In granting such relief, we neither sanction nor foreclose another petition for a protection order based on unwanted e-mails should Reedal again seek such relief. Lastly, because Reedal has not established a proper basis for awarding attorney fees on appeal, we deny her request.

Vacated.



WE CONCUR:





APPENDIX B

26A

FILED

NOV 22 2024

418

Scott G. Weber, Clark, Clark Co.

Court of Washington, County of Clark

Jennifer Reedal
Petitioner

05/27/1987
DOB

No. 24-2-07223-06

v.

Adnan Khaki
Respondent

04/10/1988
DOB

Motion for Renewal of Protection
Order (MTDRPO)

Domestic Violence

Stalking

Vulnerable Adult

Sexual Assault

Unlawful Harassment

Motion for Renewal of Protection Order

1. The *Protection Order* granted on (date) 04/15/2024, will expire on (date) 01/22/2025
2. I want to renew the protection order and any weapons surrender order because:

I Jennifer Reedal request that the protection order be made permanent for several reasons that are listed below.

1. **Respondent is the biological father to Petitioners son.** The Respondent has refused to relinquish his parental rights and has expressed a strong desire to remain involved in the child's life (see Exhibit A). However, the Respondent has persistently harassed the Petitioner regarding matters related to her son, including making inappropriate requests for the Petitioner to engage in insurance fraud, which she categorically refused. Throughout pregnancy and for several months following the birth of the child, the Respondent did not take steps to establish paternity or file for custody. Instead, he continued to subject the Petitioner to harassment during this critical postpartum period, leading her to seek a protection order against him. The Respondent appears to use child custody discussions as a manipulation tactic to initiate contact with the Petitioner, without any genuine intent to pursue custody. The child is now over one year old, and to date, no efforts have been made by the Respondent to establish paternity.
2. **Blatant restraining order violations:** In support of a restraining order, Petitioner asserts that Respondent has demonstrated a consistent pattern of behavior aimed at maintaining proximity to her despite being aware of restrictions imposed by a

protective order. This behavior suggests a deliberate attempt to intimidate or distress Petitioner, culminating in a series of interactions that could not be considered coincidental.

On April 21, 2024, Petitioner encountered Respondent near a Goodwill store in Hood River, a location Respondent knew she frequented. Although this could have appeared accidental, the cumulative nature of these encounters indicates otherwise. Petitioner had to act with extreme caution to avoid contact, underscoring her concern about Respondent's presence.

More concerning was the situation surrounding Petitioner's planned annual family trip to the San Juan Islands for the July 4, 2024 holiday. Petitioner had shared travel plans with Respondent during their relationship, and took the exact same trip to the San Juan Islands with him one year prior on July 4, 2023. Petitioner specifically noted that this trip was going to be a family tradition with her pending child, disclosing to Respondent related details pertaining to the events and hotel she would attend annually. After their breakup, Petitioner booked the trip with her family as planned. However, she discovered that Respondent planned to stay at the same hotel. On July 2, 2024, Petitioner's attorney, Sean Downs, informed Respondent's lawyer of this to ensure Respondent did not violate the protective order. Despite this, Respondent proceeded with his plans, initially claiming ignorance of the violation. On July 3, 2024, Respondent was seen at the Earthbox hotel, where Petitioner was staying, leading her to immediately notify the San Juan Sheriff's Department. Officers removed Respondent from the premises around 7:30 p.m., but he remained on the island. He attended events Petitioner had previously disclosed, encountering her again on July 4. When Petitioner, her child, and her mother approached the boat docks, Petitioner saw Respondent and recorded the interaction, fearing false allegations. True to this fear, Respondent later accused Petitioner of harassment, filing false police reports (**Exhibit B Pages 18-21**). These claims were contradicted by video evidence and witness testimony supporting Petitioner's account (**Exhibit B Pages 10-13**).

Documents in exhibit B indicate that Respondent had been informed multiple times, both by his attorney and law enforcement, to leave the area. He claimed logistical reasons, such as unavailable ferry services and staffing issues, for his continued presence. However, Officer Holt pointed out that ferry services were operational, and passengers could secure standby rides (**Exhibit B Page 16**). Respondent eventually left on a ferry but only after a prolonged period during which he violated the protective order repeatedly and attended events he knew Petitioner would be at.

This behavior demonstrates a pattern of deliberate disregard for legal boundaries, resulting in sustained harassment. Respondent's actions, including ignoring clear warnings from both his legal counsel and police, emphasize the necessity of further protection for Petitioner. His claims of unawareness to authorities' conflict with documented communications and the timeline of events listed in his voluntary statement in **exhibit B (Page 18-21)**, supporting Petitioner's request for a restraining order to ensure her safety and peace of mind.

3. **Respondent is making false reports under oath and is attempting to slander Petitioner to authorities and the community**

The Petitioner asserts that it is unreasonable for the Respondent to not only violate the restraining order in place but also engage in defamation by providing false reports to authorities. Specifically, the Respondent's police report falsely accuses the Petitioner of aggressive behavior, stalking, following him to his vehicle, and causing fear for his safety as well as that of his family and friends (**see Exhibit B, pages 18-21**). The Petitioner is a medical professional, small business owner, single mother, and law-abiding citizen. Over the past year, the Petitioner has had to dedicate significant time to drafting reports for law enforcement in response to these baseless accusations to protect her reputation. Additionally, witnesses have also been required to provide similar clarifications (**Exhibit B, pages 10-13**). This pattern of false reporting has resulted in substantial emotional distress, necessitating ongoing therapy for the Petitioner (**See declaration by MaryAnn Michaelis**).

4. **Respondent has a history of reaching out to ex-girlfriends inappropriately.** In 2022, the Respondent committed an act of physical assault against his then-girlfriend, Sadie Kor. Miss Kor did not obtain a protective order at the time, as she was unaware of the legal protections it could provide (**See Declaration of Sadi Kor**). Following their separation, the Respondent persisted in contacting Miss Kor over an extended period. This pattern of inappropriate contact has continued to the present day. Notably, in August 2024, the Respondent attempted to reconnect with Miss Kor through the dating app Bumble. Additionally, the Respondent has a documented history of defaming Miss Kor, similar to his behavior towards the Petitioner. The Petitioner has personally witnessed the Respondent portraying himself as a victim in his domestic violence case, falsely casting Miss Kor as the aggressor. He frequently described her in derogatory terms, referring to her as "Crazy Sadie" and spreading falsehoods about her alleged inability to leave him alone. These behaviors mirror the Respondent's current actions towards the Petitioner, as evidenced in **Exhibit B, pages 18-21**. The Petitioner has legitimate concerns that the Respondent will persist in contacting her inappropriately, mirroring his ongoing actions toward Miss Kor. Notably, on or around August 2024, the Respondent reached out to Miss Kor again, contradicting his own voluntary statement dated July 4, 2024, in which he claimed to have a girlfriend who feared the Petitioner. This inconsistency highlights the unreliable nature of the Respondent's statements.
5. **Respondent cannot handle being held liable for his actions and there is concern what respondent might do in the future.** The Respondent has an extensive history of evading accountability for his actions. During the course of their relationship, the Respondent disclosed to the Petitioner that his family routinely shielded him from the consequences of his behavior by shifting blame onto his friends and former girlfriends. Rather than addressing his conduct, his family would advise him to distance himself from those friends or partners. This pattern of protection extended even during incidents involving multiple DUI charges where the Respondent's family would retain skilled attorneys to mitigate his legal repercussions.

The Respondent also boasted to the Petitioner about evading domestic violence charges involving his former partner, Sadie Kor. He would detail how he avoided accepting a guilty plea, securing a rare deferral in court—an outcome he portrayed as proof of his perceived invincibility within the legal system. Despite his ongoing

legal issues, the Respondent continued to engage in substance abuse, disregard court orders, and circumvent drug and alcohol testing requirements.

Currently, the Respondent is attempting to portray himself as a victim by submitting falsified police reports against the Petitioner as an act of retaliation following the issuance of the protective order. These reports are evidently designed to discredit the Petitioner and portray her as an unsafe individual, continuing a pattern of deflecting responsibility and manipulating legal processes.

Since the protective order was granted, the Respondent has escalated matters by filing motions to appeal the restraining order in appellate court. These actions further contribute to the Petitioner's concern for her safety and that of her family, especially should the appellate court uphold Judge Lewis's original ruling. The Respondent's persistent attempts to undermine judicial decisions heighten the Petitioner's fear of future retaliatory behavior.

Summary

The Petitioner respectfully requests the court grant a lifetime protective order due to Respondent's persistent and escalating disregard for boundaries and legal directives. Despite being explicitly instructed not to contact Petitioner over a dozen times, prior to the restraining order, Respondent continuously violated these boundaries, showcasing an alarming pattern of harassment. Petitioner has significant reason to believe that Respondent will persist in using paternity as a pretext to harass and exert control, without any genuine intention of securing legal rights or responsibly engaging with the child. This manipulative behavior underscores Respondent's intent to gain unwarranted access to Petitioner, rather than focusing on the well-being or relationship with the child.

Over the past year, Respondent has not only disregarded the existing restraining order but has also attempted to weaponize law enforcement by filing false reports against Petitioner when she enforced her legal protections. Such actions demonstrate Respondent's calculated and retaliatory nature, further proving his inability to respect boundaries or comply with court mandates.

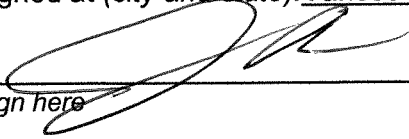
Additionally, Respondent's troubling pattern extends beyond Petitioner. He has shown a similar disregard for boundaries and safety with previous romantic partners, including attempts to reconnect romantically with ex-girlfriends whom he has a documented history of physically assaulting. This pattern of behavior illustrates a consistent inability to maintain appropriate, non-threatening relationships.

The emotional distress inflicted upon the Petitioner, along with the Respondent's repeated violations and manipulation tactics, indicates that temporary measures have proven insufficient. Therefore, a lifetime protective order is necessary to ensure the Petitioner's safety and well-being, as well as to prevent any future harassment, intimidation, or harm.

I want the renewed order to stay in place [] for (number) _____ year/s [X]
permanently.

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at (city and state): Vancouver Washington Date: 11/21/24

▶ 

Sign here

Jennifer Reedal
Print name

You must provide an address where you will receive legal documents. You have a right to keep your residential address confidential. If you have one, you may provide an address, other than your residence, where you will receive legal documents:

2006 NE 157th Ave. Vancouver WA. 98684

**This document must be served on the other party, and
proof of service must be in the court file prior to the hearing.**

Statement (Continued)

(Attach this page to your Petition)

Exhibit A



Adnan Khaki <akhaki@fairwaymc.com>
to me ▾

Sat, Aug 12, 2023, 1:22 PM ☆ 😊 ↶ ⋮

So to be clear from your requests this month... you want to be on the birth certificate and have custodial rights but you are unwilling to pay for Kaydens prenatal expenses?
Please provide me with a list of claimed Requests. I don't recall, nor do I have records of requests made from my end to you.

The second statement is unfortunately inaccurate. Please re-read the email and text below:

"As indicated in my previous text, though I am not required law nor are you in financial need, I am voluntarily willing to carry you on my insurance, which as you stated previously, saves you roughly \$350 in equitable expenses each month.

Furthermore, we will handle custodial support, parental time and legal obligations when Kayden is delivered."

Your medical, dental and vision insurance, office visits and other misc voluntary expenses are your personal responsibility and liability. We were never married, nor are you in a means of need due to financial hardship or lack of income, the latter actually, you are financially safe.

Once Kayden is born, it is my responsibility to deliver custodial support (child support), negotiate parental time for the first several months during the immediate nursing period, and all legal obligations moving forward regarding my responsibilities as a Father to our son. Keeping him healthy and safe is my number 1 priority. Of course, I can't control what you decide to do, since you've made a couple attempts to have me "sign over my parental **rights** to you" or verbally stating "he is not MY baby's father", or repeated threat "I'm not going to put him on the birth certificate." I absolutely want my name on there, and I have no intension of abandoning or disowning my son, our child, ever. I believe he is my child, and will request a **paternity** test in an effort to verify.

Exhibit B



SAN JUAN COUNTY SHERIFF

Incident Report for 24-004040

24-004078

Nature: Order Violation
Location: SJL

Address: 410 SPRING ST; EARTHBOX; #111
FRIDAY HARBOR WA 98250

Offense Codes: CDIS	Statute Codes:
Received By: Cassie M	How Received: T
Responding Officers: I Norton, J Holt	Agency: SJSO
Responsible Officer: I Norton	Disposition: INA 07/03/24
When Reported: 18:27:12 07/03/24	Occurred Between: 18:27:01 07/03/24 and 18:27:01 07/03/24

Assigned To:	Detail:	Date Assigned: **/**/**
Status:	Status Date: **/**/**	Due Date: **/**/**

Complainant: 69541	First: Jennifer	Mid: Ashley
Last: Reedal	Dr Lic: 23B	Address: 2006 NE 157th Ave
DOB: 05/27/87	Race: W	Sex: F
Phone: ()-	City: VANCOUVER, WA 98684 4544	

Offense Codes
Reported: OTHR All Other Reportable Offenses **Observed:** CDIS Citizen Dispute / Fight
Additional Offense: CDIS Citizen Dispute / Fight

Statute Codes
Additional Statute:

Circumstances

Responding Officers:	Unit :
I Norton	102
J Holt	105

Responsible Officer: I Norton	Agency: SJSO
Received By: Cassie M	Last Radio Log: **/**/** **/**/**
How Received: T Telephone	Clearance: RBS Reviewed Sheriff/Undersheriff
When Reported: 18:27:12 07/03/24	Disposition: INA Date: 07/03/24

09/10/24

P008326-090624-000003

Judicial Status:	Occurred between: 18:27:01 07/03/24	
Misc Entry:	and: 18:27:01 07/03/24	
Modus Operandi:	Description :	Method :

09/10/24

P008326-090624-000004

Involvements

Date	Type	Description	Relationship
07/04/24	Law Incident	Harassment 24-004078	Involved
07/04/24	Law Incident	Citizen Assist 24-004103	Involved
07/03/24	Name	Khaki, Adnan Ali	Suspect
07/03/24	Name	Reedal, Jennifer Ashley	Complainant
07/03/24	Vehicle	2023 TOYT 4RUNNER WA	Vehicle
07/03/24	Cad Call	18:27:12 07/03/24 Order Violation	Initiating Call

09/10/24

P008326-090624-000005

Involvements

Date	Type	Description	Relationship
07/04/24	Law Incident	Harassment 24-004078	Involved
07/04/24	Law Incident	Citizen Assist 24-004103	Involved
07/03/24	Name	Khaki, Adnan Ali	Suspect
07/03/24	Name	Reedal, Jennifer Ashley	Complainant
07/03/24	Vehicle	2023 TOYT 4RUNNER WA	Vehicle
07/03/24	Cad Call	18:27:12 07/03/24 Order Violation	Initiating Call

09/10/24

P008326-090624-000005

Narrative

On 07/03/2024, San Juan deputies responded to a report of an order violation. No crime was committed and the incident was documented.

On 07/03/2024 at approximately 1827 hours, Deputy Holt and I were dispatched to a report of an order violation at 410 Spring St; Earthbox Inn. We arrived on scene and met with the reporting party, Jennifer A. Reedal (05/27/1987), in the parking lot. Reedal relayed the following:

She booked a room at the hotel for the weekend of the fourth of July and found that her ex-boyfriend, identified as Adnan A. Khaki (04/10/1988), was in a room nearby and there was a protection order prohibiting him from going within 1,000 feet of her. Reedal stated that she notified her attorney when she was informed he was going to be staying there, and her attorney contacted Khaki informing him not to violate the protection order. Reedal provided me with the email from her attorney, which was uploaded to the case file.

I then called Earthbox and was provided with Adnan's room number, which was approximately 90 feet from Reedal's room. I then knocked on the door and Khaki answered, inviting us into the room. Khaki informed me that he was just notified by his attorney at approximately 1800 hours that Reedal was staying there and informed us that he booked the room July of 2023. He stated that Reedal knew that he had a tradition of going to the hotel for the same weekend every year and believed her to have followed him there.

Note: While speaking with Earthbox, I was informed that Reedal booked a room in May, 2024.

Khaki was actively packing his belongings when I arrived and he informed me that he booked another hotel on Orcas Island for the night to be in compliance with the order. He added that he could not make it to Orcas Island since the inter-island ferry had just been canceled until the following day, which I confirmed on the Washington State Ferries app. I called Friday Harbor Suites and was told that they had a room available. I informed Khaki and he stated that he would book a room.

I waited in the parking lot until Khaki left the property. I informed Reedal that I could not arrest on it since I could not prove he saw the email prior to the phone call with his attorney at 1800. It was obvious that Khaki was making efforts to leave the area and he was not aware of Reedal booking a room at the same hotel that he booked nearly a year in advance until she was checked into her room.

This declaration has been prepared and is being submitted to a court, a prosecutor, or a magistrate from an electronic device that is owned, issued, or maintained by the below-identified criminal justice agency.

I hereby certify (declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. (RCW 9A.72.085)

Signed this Date: 07/26/2024, Time: 1751, Friday Harbor, San Juan County, WA

/S/ Isaac Norton
Deputy Isaac Norton #102
San Juan County Sheriff's Office

09/10/24

P008326-090624-000006

Isaac Norton

From: Jennifer Reedal <reedalj@gmail.com>
Sent: Wednesday, July 3, 2024 7:32 PM
To: Isaac Norton
Subject: Fwd: Protective order

You don't often get email from reedalj@gmail.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re case #24-004040
Sent from my iPhone

Begin forwarded message:

From: Jennifer Reedal <jenreedal@hotmail.com>
Date: July 2, 2024 at 5:12:51 PM PDT
To: Sean Downs <sean@greccodowns.com>
Subject: Protective order

Hey Sean,

Thank you for taking my call today. As a recap, Adnan and I went to the San Juan Islands and stayed at the EarthBox hotel last year. I grew up going to the San Juan Islands as a kid and made it very clear at that time that I wanted to make this trip an annual event with my family. Adnan and I booked the hotel for July 3-7th of 2024 since I said I wanted this annual trip. After we broke up, the reservation was still in his name. Since I could not change that without him, I booked the hotel again under my name expecting that he would cancel his reservation. I called today to be placed in the same room I was in last year. The receptionist informed me that Adnan's reservation was still active for that room and she spoke to him yesterday confirming that he was still using the reservation. This is a very small hotel and he will be violating the restraining order if he chooses to stay there. Please relay this to the appropriate personnel so that he is not in violation.

Thank you,
Jen Reedal

Isaac Norton

From: Jennifer Reedal <reedalj@gmail.com>
Sent: Wednesday, July 3, 2024 7:34 PM
To: Isaac Norton
Subject: Fwd: Protective order

You don't often get email from reedalj@gmail.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re case #24-004040
The two emails just sent are the email
Communications with my lawyer. My lawyer informed me that he reached out to Adnan Khakis lawyer
and informed him that I would be here and his presence violates the RO.

Thank you,
Jen Reedal
Sent from my iPhone

Begin forwarded message:

From: Jennifer Reedal <reedalj@gmail.com>
Date: July 3, 2024 at 11:14:24 AM PDT
To: Sean Downs <sean@greccodowns.com>
Subject: **Re: Protective order**

Thank you. I appreciate it.
Sent from my iPhone

On Jul 3, 2024, at 11:01 AM, Sean Downs <sean@greccodowns.com> wrote:

Yes, I emailed his lawyer and the lawyer let Adnan know. Hopefully Adnan
will re-book somewhere else.

Sean M. Downs | Attorney at Law | Grecco Downs PLLC
701 Columbia St. #109 | Vancouver, WA 98660
Tel: 360-707-7040 | Fax: 1-855-309-4530
Email: sean@greccodowns.com | Website: www.greccodowns.com

-----Original Message-----

From: Jennifer Reedal <reedalj@gmail.com>

1

P008326-090624-000023

Sent: Wednesday, July 3, 2024 10:59 AM
To: Sean Downs <sean@greccodowns.com>
Subject: Protective order

Hello Sean,

I am headed to the ferry now and was wondering if you had a chance to reach out to Adnan's lawyer about the hotel situation. I also gave the owner of the hotel a heads up regarding the situation.

Thank you,

Jen

Sent from my iPhone

San Juan Sheriff's Office Voluntary Statement

Regarding the events that took place on July 3rd & 4th 2024 I would like to state the following. My daughter Jennifer Reedal and I have been planning on going on this trip since the summer of 2023. Jennifer had been sailing to Friday Harbor on our Sailboat since she was a child. After going to Friday harbor with Adnan Khaki, she wanted her son to experience this as an annual 4th of July celebration. When Jennifer and Adnan broke up, Jennifer and I began making arrangements to continue with the trip. This trip was planned with the intention of the two of us going in the summer of 2023.

Jennifer had made it very clear to Adnan, her friends and family that she intended to make this an annual tradition with her son and future family. When she found out that Adnan did not cancel his reservation, she made her own reservation- still in hopes she could get the room he had reserved because the location was right next to the dog-friendly field. Jennifer and I both believed that Adnan Khaki would cancel his hotel room.

Jennifer did not want to see Adnan because it creates a trauma response for her. She went out of her way to make sure that he would not violate his restraining order days in advance, by calling the hotel to be sure they knew of the circumstances- which is how she found out he did intend to be at the hotel. She also notified her lawyer to prevent him from being at the hotel.

On July 4th I was walking with Jennifer at the 4th of July celebration in Roach Harbor. Jennifer was pushing her son in his stroller and I was walking our dogs a few feet behind her. Jen did not aggressively approach Adnan and his girlfriend. This can be verified because Jennifer recorded the entire encounter. In fact, it happened so fast I did not even see Adnan until he walked past me. Jennifer did not follow Adnan and his girlfriend. We had walked to the bottom of the ramp into the boat harbor when Jen asked the two of them to leave and verbalized, he was once again violating his restraining order. She walked to the top of the ramp about 20 ft away from me to make sure they were exiting the event so she would not have to call the police.

It is not my direct experience that his friends, specifically his best friend Jordan Matin, are afraid of Jen. On June 29, 2024 Jen and I entered a restaurant in Vancouver. While we were standing in line Jordan and his partner initiated a conversation that lasted several minutes. Upon leaving they also said good bye.

I certify (declare) under the laws of the State of Washington that the foregoing is true and correct. (RCW 9A.72.085)

Debra Munhoz 8/1/24
Signature of person giving statement
Deborah Munhoz

Jennifer Keener
Witness

P008326-090624-000025

San Juan Sheriff's Office Voluntary Statement

I appreciate the opportunity to respond case #24-004040 in San Juan County Washington. Specifically, Mr. Khaki claims via a voluntary statement that I was harassing him on July 4th 2024. I am not aware of any forms of harassment on my behalf or anything that can be considered as such. I have serious concerns with Adnan Khakis behavior in this matter regarding his repeated attempts to gain access and slander me and the potential that he has misrepresented his intentions or behaviors in his report. I am more than happy to assist and participate fully with any investigation of Adnan's conduct and have proof that Adnan was well aware of his restraining order violation.

I want it to be known that Mr. Khaki and I went to the San Juan Islands for the July 4 2023 holiday. I planned this trip based on the suggestion of my coworker and stated multiple times during the trip to Mr. Khaki that I planned to make this an annual family tradition for the 4th of July; doing all the same 4th of July events that the Island held annually. As a child, I grew up sailing to the San Juan Islands with my family and wanted my son to grow up coming to the islands the same way I had.


Because of my request, Mr. Khaki booked the same hotel reservation for the following year for us. It would be safe to say that after the dissolution of a relationship, most people with a restraining order would cancel their reservation to a hotel that the protected person said she would be going to annually. When I called the hotel to finalize my reservation details the day before the trip on July 2nd 2024, I discovered that this was not the case. Mr. Khaki kept the reservation. When I discovered this, I informed my lawyer Sean Downs on July 2nd of the situation. Mr. Downs informed me that he would let Mr. Khakis lawyer know about the situation so that he could make alternative plans.

On July 3rd at 11:01 Mr. Downs informed me that Mr. Khakis lawyer had notified him to get another hotel. Mr. Khaki states in his voluntary statement on 7/4/2024 that he was aware of the email and restraining order violation that would occur as he was notified at 3:15PM on July 3rd. Instead of leaving at that time. Mr. Khaki knowingly violated the restraining order and stayed on site until the San Juan Police department escorted him off the premises at approximately 7:30.

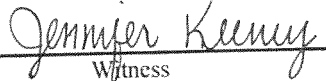
Officer Nortan informed me on 7/3/24 that he did not arrest Mr. Khaki because Mr. Khaki claimed that he did not see the attorney's email to not go to the hotel until 6 PM. This directly contradicts Mr. Khakis 7/4/24 statement that he was aware of the email from his attorney notifying him to leave the hotel at 3:58.

Unfortunately, Mr. Khaki stayed on the island and maintained close proximity to me. He chose to attend the 4th of July events that I had informed him a year prior I would be going to annually. In Mr. Khakis 7/4/24 voluntary statement, he stated that he was aware that I planned to attend to

I certify (declare) under the laws of the State of Washington that the foregoing is true and correct. (RCW 9A.72.085)


Signature of person giving statement

8/1/24


Witness

the 4th of July events which is why he skipped the parade. However, he still chose to attend the main festivities in Roach Harbor.

Mr. Khaki is also making the false statement that I was harassing him because I asked him to leave the area. He states that I was "aggressively pacing" in his direction and creating a scene. I did not act in an aggressive manner at all. In fact, I videotaped the entire event because I was afraid of how Mr. Khaki would respond while I enforced my protective order and I was also afraid that he would falsify events. I am happy to provide this recording on request.

Mr. Khaki goes on to claim that I was following him. This is another false statement. I walked from the bottom of the boat ramp, about 20 ft to the top of the ramp to make sure Mr. Khaki left the event so I did not have to call the police.

Furthermore, Mr. Khaki claims that he was trying to get off the island but was stuck there until 10pm on July 4th. Mr. Khaki is contradicting himself within his voluntary statement because when the officer told Mr. Khaki to leave the island, he caught an earlier ferry at 3:30 PM. Mr. Khaki was not staying on the island because he was stuck there. He was deliberately staying to attend the events that he was aware I would be attending and further traumatize me.

Mr. Khaki also claims that he comes to the San Juan islands annually. This is another false statement. To my knowledge, Mr. Khaki came to the island several years ago with an ex-girlfriend and has never come annually.


Mr. Khaki also states he has not wanted anything to do with me since July. This is another false statement. In fact, Mr. Khaki would not leave me alone after I dumped him in July, he harassed me so much from July 2023 to January 2024 and caused such emotional distress, that I had to get a protective order so that he would leave me alone.

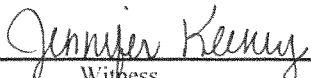
Finally, Mr. Khaki claims that people are afraid of me. Specifically, his family, friends, and partner. Again, this statement does not make sense and appears to be a manipulation attempt. I have not seen or spoken to Adnan's family since before I broke up with him in July 2023.

I am only aware of two friends Mr. Khaki has. One would be a man named Kurt who I never met. His other friend Jordan Matin is the only friend I am aware of actually meeting and interacting with before and after Mr. Khaki and I were together.

Mr. Matin and his fiancé Kaydee do not seem afraid of me at all. In fact, I have remained in communication with Kaydee. When she had a miscarriage earlier this year, I reached out to send my condolences and we had a nice discussion via text message. Additionally, my mother Deborah Munhoz and I ran in to Mr. Matin and Kaydee on June 29th 2024 at a restaurant. I did not notice they were there but Jordan called out my name to get my attention. He complimented how good I looked after having a baby and we had a nice conversation before I ordered my meal. I have never had any indications that they were afraid of me.


I certify (declare) under the laws of the State of Washington that the foregoing is true and correct. (RCW 9A.72.085)

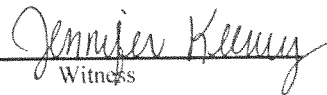
 8/1/24
Signature of person giving statement


Witness

I feel Mr. Khaki is making false police reports because does not like being held responsible for his actions. He used to brag to me about how he was able to get out of domestic violence charges with his ex-girlfriend. Mr. Khaki is now trying to look like a victim. I have already given the Clark County court an overwhelming amount of evidence that he lies, emotionally harasses me and has been the aggressor in situations following our break up. Hence why Judge Robert Lewis granted me the restraining order, despite Mr. Khaki attempts to fight it with his legal team.

I certify (declare) under the laws of the State of Washington that the foregoing is true and correct. (RCW 9A.72.085)


8/1/24
Signature of person giving statement


Witness

RCW 9A.02.0020



SAN JUAN COUNTY SHERIFF

Incident Report for 24-004078

24-004040

Nature: Harassment

Address: 204 FRONT ST N; PORT OF
FRIDAY HARBOR; call back
FRIDAY HARBOR WA 98250

Location: SJL

Offense Codes: DISP

Statute Codes:

Received By: H James-Slusher

How Received: T

Agency: SJSO

Responding Officers: J Holt

Responsible Officer: J Holt

Disposition: INA 07/11/24

When Reported: 14:51:03 07/04/24

Occurred Between: 14:50:20 07/04/24 and 14:50:20 07/04/24

Assigned To:

Detail:

Date Assigned: **/**/**

Status:

Status Date: **/**/**

Due Date: **/**/**

Complainant: 69540

Last: Khaki

First: Adnan

Mid: Ali

DOB: 04/10/88

Dr Lic: 23B

Address: 2006 NE 157th Ave

Race: W

Sex: M

Phone: ()-

City: VANCOUVER, WA 98684 4544

Offense Codes

Reported: OTHR All Other Reportable Offenses

Observed: DISP DISPUTE/FAMILY
NEIGHBORHOOD

Additional Offense: DISP DISPUTE/FAMILY
NEIGHBORHOOD

Statute Codes

Additional Statute:

Circumstances

Responding Officers:

J Holt

Unit :

105

Responsible Officer: J Holt

Received By: H James-Slusher

How Received: T Telephone

Agency: SJSO

Last Radio Log: **.*.* **/**/**

Clearance: RBS Reviewed
Sheriff/Undersheriff

09/10/24

P008326-090624-000031

Involvements

Date	Type	Description	Relationship
07/04/24	Law Incident	Order Violation 24-004040	Involved
07/04/24	Law Incident	Citizen Assist 24-004103	Involved
07/04/24	Name	Khaki, Adnan Ali	Complainant
07/04/24	Name	Reedal, Jennifer Ashley	Suspect
07/04/24	Cad Call	14:51:03 07/04/24 Harassment	Initiating Call

09/10/24

P008326-090624-000033

Narrative

On 7/4/24 a San Juan deputy took a report of harassment. The reporting party was referred to the court for remedy.

On 7/4/24 at approximately 1450 hours, I was advised that Adnan A Khaki (DOB-4/10/88) had called to report harassment by his ex-girlfriend Jennifer A Reedal (DOB-5/27/87). I had responded to an Order Violation case that Jennifer had called in the prior day in which she appeared to have booked a hotel room in order to force him to change his plans. He had booked a hotel room approximately 1 year in advance. Spending the July 4th holiday in Friday Harbor is a yearly tradition for him and Jennifer knew this. She had booked a room at the same hotel in May. Adnan had already booked a different hotel on Orcas Island in order to get away from Jennifer by the time we arrived. Transportation to the island was not available at that time. Deputy Norton was responsible for the call and stayed with Adnan to find a solution while I responded to an urgent call.

On this day Adnan advised me that he had taken his current girlfriend to Roche Harbor. The inter-island ferry had been cancelled and he could not leave until 10pm, so he felt that he could spend time there, well away from Jennifer. Approximately 1 hour after they arrived, Jennifer appeared; she had followed them onto the dock, was yelling at him that he was violating the order, and she began to video record him. He said he immediately left the area, though he had to walk past her to get away. He said he did not speak to her or contact her in any way, but she did follow both he and his girlfriend to their vehicle. He said they were now back in Friday Harbor.

He asked what he could do to protect himself in these situations. I said that he had acted appropriately in not engaging with Jennifer, and leaving as soon as he could. I advised that reporting it was also important. I asked if he wished to provide a voluntary written statement of his account of the incident, he said he would. He asked if there was anything else he could do. I said he could report the incidents to the court and request they adjust the current order, or he could request a competing order to keep her from contacting him as well. I advised this would need to be done through the original court.

Adnan advised that the ferries had been cancelled and he could not get to Orcas Island until 10pm. I checked the ferry schedule and noted that there was a boat leaving for Anacortes within 30 minutes, and another boat leaving Anacortes, bound for Orcas that would get them there far sooner than the 10pm boat. He advised he would get in line for the ferry immediately. I advised that he could go to Sheriff Substation on Orcas to provide his written statement and they would get it to me. He said he would do so.

I later noted a four-page statement had been left at the Sheriff's Office in this case. I attached it to this case.

This report is for documentation only and will be inactivated.

This declaration has been prepared and is being submitted to a court, a prosecutor, or a magistrate from an electronic device that is owned, issued, or maintained by the below-identified criminal justice agency.

09/10/24

P008326-090624-000034

I hereby certify (declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. (RCW 9A.72.085)

Signed this Date: 7/11/24, Time: 1602, Friday Harbor, San Juan County, WA

/S/ Joshua Holt
Deputy J. Holt - 105
San Juan County Sheriff's Office

Responsible LEO:

Approved by:

Date

09/10/24

P008326-090624-000035

SAN JUAN COUNTY SHERIFF'S OFFICE VOLUNTARY STATEMENT

Page 1 of

CASE NUMBER: 24-004078
 Print Name: ADWAN ALI KHAKI Date of Birth: 01/10/1988 Age: 36
 Residence Address: 95 GARIBOLDI ST
LAKE OSWEGO, OR 97035
 Mailing Address: SAME AS RESIDENCE
 Cell: 503-746-3300 Home Phone: _____ Work Phone: _____

I, the undersigned, am not under arrest for, nor am I being detained for any criminal offenses concerning the events I am about to make known to the San Juan County Sheriff's Office. I volunteer the following of my own free will, for whatever purposes may serve.

I ADWAN KHAKI BOOKED A ROOM AT EARSH BOX INN JULY 2023 TO STAY JULY 3-7TH 2024. I RECEIVED A PHONE CALL FROM THE PARALEGAL AT MY ATTORNEY, COUN MCKEAN'S OFFICE DURING LUNCH AT AROUND 3:15 PM ASKING ME IF I HAD BEEN MR. MCKEAN'S EMAIL THAT DAY + INFORMED ME MY EX, THE PREVIOUS INDIVIDUAL'S LEGAL TEAM, EMAILED HIM TO INFORM US SHE WAS STAYING/VACATIONING AT FERRY HARBOUR + STAYING IN THE SAME HOTEL...
 3:58 PM PST - RESPONDED TO COLIN MCKEAN'S EMAIL + SCHEDULED A CALL FOR LOCAL COUNSELING
 - SEARCHED FOR ALI ACCOMMODATIONS ON SAN JUAN ISLAND AWAY FROM THE PARALEGAL BOOKING, WITH NO LUCK.
 6 PM PST (CALL W/ COLIN MCKEAN (DURATION 12 M 37S), ADVISED IF HOTEL ISN'T LARGE ENOUGH FIND ANOTHER LOCATION OR LEAVE ISLAND
 7:13 PM PST - LOCATED OTHER ACCOMMODATIONS AT FERRY HARBOUR INN ON ORCAS ISLAND FOR REMAINDER OF HOLIDAY (7/4-7/5)
 7:19 PM PST - MY PARTNER WENT TO THE CAR TO GRAB ITEMS + INFORMED ME OF A BLONDE WOMAN 5 FEET

I have read each page of this statement, consisting of _____ page(s) of which bears my signature, and corrections, if any, bear my initials. I certify (declare) under penalty of perjury under the Laws of the State of Washington that the foregoing is true and correct.

Date: 7/4/24


 Signature of person giving statement

Address where statement signed Ferry Harbour Inn, ORCAS ISLAND

P008326-090624-000049

SAN JUAN COUNTY SHERIFF'S OFFICE
VOLUNTARY STATEMENT

Page of

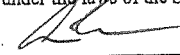
CASE NUMBER: 24-001078

Down was talking to two police officers
 7:20 PM PST - Deputies Hald + Norton knocked on my door,
 knowing only they were possibly there I. Partially invited
 them into the unit to speak + not make a scene
 or draw any attention, starting other parties.
 - showed deputies small exchanges w/ Leal +
 all precautionary measures to avoid contact or accidental
 encounter of Mrs. Roal, including newly booked
 accommodations.
 - Ferries for the night were cancelled +
 water taxi was no longer running. Deputy Norton
 graciously assisted us in locating temporary accommodations
 at Friday Harbor Survey in a room that met
 the 1000 ft distance mandate.

- We packed our room and quickly
 unclipped the placards, obtaining Deputy Norton's
 card w/ the case # for attorney Francis.
 * I was informed by the deputies (Norton) Mrs. Roal
 booked her stay May 2024, which ~~coincided~~ ^{coincided} her
 representing attorney's initial claim of "Bookings ~~for~~
 separately afterwards."

Note/Side Bar - My legal team + I submitted our case to
 the court of appeals in May 2024 for the anti-harassment
 order / ~~injunction~~ ^{injunction}.

I certify (declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct
 (RCW 9A.72.085)

 7/4/24
 Signature of person giving statement

Olena Voloshyna (significant other)
 Witness

Witness

Address where statement signed

P008326-090624-000050

SAN JUAN COUNTY SHERIFF'S OFFICE
VOLUNTARY STATEMENT

Page of

CASE NUMBER: 24-004078


July 4th, 2024

- My Partner + I were very Careful of our whereabouts in the morning of July 4th 2024, skipping the parade due to a fear of running into Mr. Record + ~~others~~. To spend the afternoon on the other side of the head in Roach Harbor to burn time until the next ferry to Orcas Island arrived. ~~...~~

* Due to staffing issues + festivities the ferry was not available until 10 PM PST * (we were in the dock, as late as we were in Roach Harbor. I passed) 2:15 PM PST - It hadn't been longer than an hour when my Partner heard a loud voice in the distance, she nudged me and informed me "She's here..."

- I turned around to address the situation, witnessing Mr. Record holding her phone recording a video while aggressively ~~...~~ in our direction + creating a scene - Young "You are in violation of your protection order ... if I see you again I will call the police ..." Amongst other things, she then proceeded to address my significant other aggressively with a loud tone, while recording stating "... Look him up online, he has a criminal record + a history with ..." (I don't check the rest, as I was quickly trying to vacate the harbor to avoid making contact or ~~...~~ her aggression.)

I certify (declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct (RCW 9A.72.085)

 7/4/24
Signature of person giving statement

OLENA VOLOSHEVA #
Witness

Witness

Address where statement signed

P008326-090624-000051

2:20 PM PST - As we quickly made our way to the parking area, my partner informed me "site is following us, why won't she leave us alone?"

- I informed my partner, "I'm not here, keep walking. Let's cancel our lunch plans here + head to Friday Harbor." My partner indicated that she felt uncomfortable and unsafe due to Mr. Reedal's aggressive behavior and unprovoked remarks.

- UPON arrival to Friday Harbor I found a secured parking lot by the harbor and reported the incident with dispatch. It is evident that Mr. Reedal booked this stay knowing of my original reservations from July 2023, + had chosen to vacation at this location w/ less than innocent intentions. ~~we took the next ferry off the island (5:30)~~ WE TOOK THE NEXT FERRY OFF THE ISLAND (5:30) TO ARRIVE AT THE 6:45 PM PT TO OREGON.

- Given the circumstances of the order, her weaponization of a previous records to manipulate the courts to grant her anti-harassment / protection order, timeline of the appeal submission + her booking, and this explicit action, I DO NOT FEEL SAFE knowing she has the power to incriminate me + manipulate the system while feeding into her falsified narrative.

- This woman will not leave me alone, my friends, my family, my colleagues, and now my partner are afraid of her, her unkind personality + unpredictable behavior.

- I have been silent for long enough, while going through the appropriate channels through representation. Enough is enough. I want and have not wanted anything to do with this woman or her family since our parting of ways ~~just~~ around July 20th 2023. I still want nothing to do with this woman + am deeply afraid of her. She is smart, calculated, + extremely manipulative. I just want her to go away + no longer live in fear, looking over my shoulder, wondering if Mr. Reedal will be there lurking around the corner. She is a danger to me, my freedom + my sanity. I want to either revoke the order or instill an injunctive order on her while my legal team navigates through the appeal process. while available upon request.

P008226-090624-000052

(Continue on separate page if needed)

I certify under penalty of perjury under the laws of the state of Washington that all the information provided in this petition and any attachments, is true and correct. [] I have attached (number): 21 pages.

Signed at (City and State): Vancouver Washington Date: 11/21/24

Sign here 

Jennifer Reedal
Print name

APPENDIX C

4A
VPD

FILED
JAN 22 2025

11:29

Scott G. Weber, Clerk, Clark C.

Superior Court of Washington, County of Clark

Jennifer Reedal 5/27/1987
Petitioner Date of Birth

vs.

Adnan Khaki 4/18/1988
Respondent Date of Birth

No. 24-2-07223-06

**Order Renewing Protection Order
(ORPRTR)**

- Domestic Violence
- Sexual Assault Harassment
- Stalking Vulnerable Adult

Clerk's action required: 6, 7, 8

Renewal Expires: January 22, 2027

Order Renewing Protection Order

1. **Request.** The protected person filed a *Motion for Renewal of Protection Order*.

The protected person did did not ask to change the protection order with the renewal.

2. **Hearing.** The hearing was held on (date): January 22nd, 2025. These people attended:

- | | | | |
|---|---|-----------------------------------|--|
| <input checked="" type="checkbox"/> Protected Person | <input type="checkbox"/> in person | <input type="checkbox"/> by phone | <input checked="" type="checkbox"/> by video |
| <input checked="" type="checkbox"/> Protected Person's Lawyer | <input checked="" type="checkbox"/> in person | <input type="checkbox"/> by phone | <input type="checkbox"/> by video |
| <input type="checkbox"/> Petitioner (if not the protected person) | <input type="checkbox"/> in person | <input type="checkbox"/> by phone | <input type="checkbox"/> by video |
| <input checked="" type="checkbox"/> Restrained Person | <input checked="" type="checkbox"/> in person | <input type="checkbox"/> by phone | <input type="checkbox"/> by video |
| <input checked="" type="checkbox"/> Restrained Person's Lawyer | <input checked="" type="checkbox"/> in person | <input type="checkbox"/> by phone | <input type="checkbox"/> by video |
| <input type="checkbox"/> Other: _____ | <input type="checkbox"/> in person | <input type="checkbox"/> by phone | <input type="checkbox"/> by video |

3. **Basis**

The court has considered the motion and any supporting documents, response from the restrained person (if any), relevant sections of the court record, and any testimony or argument.

4. **Findings:**

Uncontested. The restrained person did not contest the motion for renewal.

Evidence. The restrained person did **not** prove by a preponderance of the evidence that there has been a substantial change in circumstances as provided in RCW 7.105.405(5) and that the restrained person will not:

(for *dv orders*) resume acts of domestic violence against the protected person or the protected person's children or household members who are minors or vulnerable adults when the protection order expires.

(for *sexual assault orders*) engage in, or attempt to engage in, physical or nonphysical contact with the protected person when the order expires.

(for *stalking orders*) resume acts of stalking against the protected person or the protected person's family or household members when the order expires.

(for *anti-harassment orders*) resume harassment of the protected person when the order expires.

(for *vulnerable adult orders*) resume acts of abandonment, abuse, financial exploitation, or neglect against the vulnerable adult when the order expires.

Other findings: fees related to order renewal
& mtn to strike (R) effect, resulting in
a limited award of \$500 to Petitioner.

5. Order:

The court **grants** the protected person's motion for renewal of the order/s. The new order/s shall be in effect for a fixed time no less than 1 year, or permanently.

The *Motion for Renewal* filed on (date) 11/22/24 is:

Granted without change. The terms of the Protection Order entered on (date) 4/15/2024 are renewed and shall expire on date listed on page 1.

Terms of the *Order to Surrender and Prohibit Weapons* entered on (date) _____ are renewed and shall expire date listed on page 1.

Compliance review hearing is set for (date) _____
See **How to Attend** below.

Granted with changes as requested by the protected person and as stated separately in the amended order/s as follows (*check all that apply*):

Protection Order, PO 040.

Order to Surrender and Prohibit Weapons, WS 001.

Judgment – Protection Order, PO 044 awarding fees and costs to the protected person.

6. **Washington Crime Information Center (WACIC) and Other Data Entry**

Clerk's Action. The court clerk shall forward a copy of this order immediately to the following law enforcement agency:

Clark County Sheriff's Office or Vancouver Police Department

(List the same agency that entered the earlier order, if any)

This agency shall enter this order into WACIC and National Crime Info. Center (NCIC).

7. **Service on the Restrained Person**

Required. The restrained person must be served with a copy of this order.

The **law enforcement agency** where the restrained person lives or can be served shall serve the restrained person with a copy of this order and shall promptly complete and return proof of service to this court.

Clark County Sheriff's Office Vancouver Police Department

Other: _____

The **protected person** (or person filing on their behalf) shall make private arrangements for service and have proof of service returned to this court. *(This is not an option if this order requires: weapon surrender, vacating a shared residence, transfer of child custody, or if the restrained person is incarcerated. In these circumstances, law enforcement must serve, unless the court allows alternative service.)*

Clerk's Action. The court clerk shall forward a copy of this order on or before the next judicial day to the agency and/or party checked above. The court clerk shall also provide a copy of the service packet to the protected person.

Alternative Service Allowed. The court authorizes alternative service by separate order (*specify*): _____

Not required. The restrained person appeared at the hearing, in person or remotely, and received notice of the order. No further service is required. See section 2 above for appearances. *(May apply even if the restrained person left before a final ruling is issued or signed.)*

8. **Service on Others (Vulnerable Adult or Restrained Person under age 18)**

Service on the vulnerable adult adult's guardian/conservator restrained person's parent/s or legal guardian/s (*name/s*) _____ is:

Required

The **law enforcement agency** where the person to be served lives or can be served shall serve a copy of this order and shall promptly complete and return proof of service to this court.

Clark County Sheriff's Office Vancouver Police Department

Other: _____

The **protected person** or person filing on their behalf shall make private arrangements for service and have proof of service returned to this court.

Clerk's Action. The court clerk shall forward a copy of this order on or before the next judicial day to the agency and/or party checked above.







Not required. They appeared at the hearing where this order was issued and received a copy.

9. **How to Attend Next Court Hearing**

No hearing scheduled

The hearing scheduled in section 5 will be held:

10. P's mtr to shle was granted.
11. limited attorney fee award of \$500 to petdm due within 30 days.

How to attend the next court hearing (date and time on page 1)	
	<p>In person</p> <p>Judge/Commissioner: _____ Courtroom: <u>To Be Determined</u></p> <p>Address: 1200 Franklin Street, 601 W. Evergreen, or 500 W. 11th, Vancouver, WA 98660</p> <p>To locate your hearing on the day of, view the Daily Schedule at: https://www2.clark.wa.gov/files/dept/superiorcourt/dockets/supcrtsch.html</p>
	<p>Online (audio and video) Please check the Court's Webpage for the current Zoom link information. https://clark.wa.gov/sites/default/files/media/document/2024-10/protection-order-dockets_0.pdf</p>
	<p>By Phone (audio only) Please check the Court's Webpage for the current Zoom call in information, including meeting ID and password. https://clark.wa.gov/sites/default/files/media/document/2024-10/protection-order-dockets_0.pdf</p>
	<p>If you have trouble connecting online or by phone (instructions, who to contact)</p> <p>Contact the Clerk's Office: <u>564-397-2292</u></p> <p>Then: <u>Judicial Assistant for the assigned Commissioner/Judge</u> <u>Commissioner Jill Sasser: Rebecca Wittenborn, 564-397-4037</u> <u>Commissioner Juliet Laycoe:</u> <u>Judge Gregory Gonzales, Kaitlynn Knable, 564-397-2354</u> <u>Judge Nancy Retsinas, Kim Nigg, 564-397-2315</u> <u>Judge Tsering Cornell: 564-397-2170</u></p>
	<p>Ask for an interpreter, if needed. Contact: <u>360-759-6924</u></p> <p><u>DistrictCourtIntCoor@clark.wa.gov</u></p>
	<p>Ask for disability accommodation, if needed. Contact: an ADA Coordinator via email at superior.courtada@clark.wa.gov, visit our website at https://clark.wa.gov/courts.ada-policy-and-procedures or call Court Administration at 564-397-2150</p>
Ask for an interpreter or accommodation as soon as you can. Do not wait until the hearing!	

Ordered.

Dated: 1/22/2025 at 11:20 (a.m./p.m.) [Signature]
Judge/Court Commissioner

I received a copy of this order:

<u>[Signature]</u>	<u>42261</u>	<u>Collin McKean</u>	<u>1/22/25</u>
Signature of Respondent/Lawyer	WSBA No.	Print Name	Date
<u>[Signature]</u>	<u>39850</u>	<u>SEAN DOWNS</u>	<u>01/22/2025</u>
Signature of Petitioner/Lawyer	WSBA No.	Print Name	Date

APPENDIX D

**IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE**

JENNIFER ASHLEY REEDAL,

Respondent,

v.

ADNAN ALI KHAKI,

Appellant.

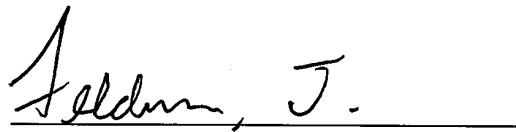
No. 86877-2-1

CORRECTED ORDER DENYING
MOTION FOR
RECONSIDERATION

The respondent, Jennifer Reedal, has filed a motion for reconsideration. A majority of the panel has determined that the motion should be denied.

Now, therefore, it is hereby

ORDERED that the motion for reconsideration is denied.



Judge

GRECCO DOWNS, PLLC

July 21, 2025 - 4:54 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 104,370-8
Appellate Court Case Title: Adnan Khaki v. Jennifer Reedal
Superior Court Case Number: 24-2-07223-7

The following documents have been uploaded:

- 1043708_Other_20250721164933SC856202_0020.pdf
This File Contains:
Other - Motion for discretionary review
The Original File Name was Reedal petition for review 1043708.pdf

A copy of the uploaded files will be sent to:

- collin@mckeansmithlaw.com
- teamccm@mckeansmithlaw.com

Comments:

Sender Name: Sean Downs - Email: sean@greccodowns.com

Address:

701 COLUMBIA ST APT 109

VANCOUVER, WA, 98660-3468

Phone: 360-707-7040

Note: The Filing Id is 20250721164933SC856202