

90379-4

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Court of Appeals No. 69747-1-I

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IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION I

ANH-THU THI VU

Petitioner,

v.

VINH QUOC DANG

Respondent.

ANSWER OF VINH QUOC DANG TO PETITION FOR REVIEW
IN THE WASHINGTON SUPREME COURT

Supreme Court No. 90379-4

Tsai Law Company PLLC
By:

Emily J. Tsai, WSBA #21180
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2101 4th Avenue #1560
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 ORIGINAL

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I. INTRODUCTION

The court should deny Anh Thu Vu's petition for review of the unpublished April 28, 2014 decision of the Court of Appeals¹ affirming the trial court on all grounds. Ms. Vu repeatedly fails to make legal arguments and makes inflammatory allegations against the opposing party, her own attorney, and the trial judge. Her Petition should be denied because she fails to establish any of the criteria for review by this Court. The Court of Appeals determined that her appeal was so devoid of merit that it was frivolous. As such, Mr. Dang seeks attorney's fees for having to answer this frivolous Petition for Review.

II. COUNTERSTATEMENT OF ISSUES

Dang asserts that there is no basis for this Court's review pursuant to RAP 13.4. If review is accepted, the following would be presented:

1. Whether Ms. Vu, while assisted by an interpreter and independent counsel hired by her, was denied access to justice because she made a stipulation she now claims she didn't understand?
2. Whether the court's discretionary rulings appear fair where there is no other evidence of bias?
3. Whether any claim to effective assistance of counsel in a civil case is a matter of substantial public interest?
4. Whether Ms. Vu was able to testify adequately to present the issues and evidence she wished to present in her case?

¹ *In re Marriage of Vinh Quoc Dang and Anh-Thu Thi Vu*, Cause No. 69747-1-1, Washington Court of Appeals, Division One

III. COUNTERSTATEMENT OF THE CASE

This case involves the dissolution of a a short term (four year) marriage. (RP 85:3, RP 284:19-20) Dang is a traffic engineer working for the Washington State Department of Transportation. (RP 252:12-14) The wife, Ms. Vu [hereafter Vu] works in customer service for the Social Security Administration. (RP 48) Both parties are originally from Vietnam and are bilingual. (RP 43) Both parties obtained college degrees from American universities. (RP 112:3-13, 212:17-19) The husband was 55 years old at the time of trial. (RP 42:15) He has an adult son from a prior relationship who was in medical school. (RP 110)

Prior to marriage, the husband proposed that the parties enter a prenuptial agreement. (RP 47:20-21) At that time, the husband was still assisting his son through college and he didn't want to worry about accounting to his wife for money he was paying to help his son through college. (RP 47: 22 – RP48:1-3)

The parties lived in different states at the time they became affianced. (RP 44) Dang lived in Washington State. (RP 44:14) Vu lived in the state of California. (RP 44:11) Dang engaged a California attorney to assist him in preparing the prenuptial agreement. (RP 48:21-25) When

faced with the option of a Washington or California prenuptial agreement, he sought to make access to counsel easier for Vu. (RP 49:9-11) Vu hired a second attorney to represent her (RP 50: 1-14, Exhibit 1) The parties discussed between themselves some of the provisions of the prenuptial agreement prior to execution. (RP 56:7-25, RP 57: 1-11, Ex. 14) Both parties signed the prenuptial agreement and both their respective counsel signed the prenuptial agreement indicating that they had reviewed the agreement with their respective clients. (RP 61: 10)

Within the agreement, both parties listed their respective separate assets, including real estate, bank accounts, investment accounts and retirement as exhibit attachments. (RP 51, Ex 1: Exhibits A & B) The agreement provided that each party would keep their paychecks as separate property, but that they would create a combined community account into which they would deposit money for community spending. (RP 51, Ex 1: 4, paragraph 4.1) During the marriage, the parties created a joint account where they deposited monthly an equal sum of money for community savings and spending. (RP 100-103) The parties moved into Dang's home and he paid all the regular home maintenance expenses, including any debts against the home, repair of the home or upkeep from his personal savings. (RP 150, EX 49, 199, 420:15-17) The parties used

the joint account where they were both depositing a portion of their income for utilities and for food. (RP 97: 6-10, RP 276: 17-21, Ex. 34, 35, 36, 37) They saved jointly approximately \$18,000.00 in that account during the marriage, which the court divided evenly on divorce. (CP 21)

Because the prenuptial agreement allowed each party to keep their own pay check, and Dang primarily paid for housing expenses, Vu was able to accumulate roughly \$90,000.00 in savings from her paycheck during the marriage, in addition to putting money into a deferred compensation account, as well as into FERS, a defined benefit account. (RP 379-382, 384-385) Her consolidated accounts just after filing not including retirement totaled more than \$160,000.00 which she reduced to cashier's checks. (RP 379-382, Ex 39: 79-81. For the temporary orders hearing, she failed to disclose these cashier's checks as "cash on hand" or other liquid asset. (EX 48: 3) When this was later brought to the court's attention, she remained vague about how much money she had actually put into cashier's checks. (RP 314-315) The husband had a defined benefit account through his employment with the State of Washington. (RP 115-116, Ex 10) He accumulated no additional savings during marriage, and in fact depleted some of his previous separate savings

between the date of marriage and the date of separation, as well as incurring debt against his separate property home. (RP 91-93)

Mr. Dang attempted to engage in a collaborative dissolution of marriage. (RP 170) He arranged to have his brother and sister give the divorce paperwork to his wife while she was at the residence. (RP 170, CP 61-62) After Vu was served with the paperwork, she hired an attorney and made accusations against him and obtained, an ex parte restraining order preventing him from returning home. (RP 170, CP 63-66) He was shocked by her accusations which he asserted were false and made to retaliate against him for filing for divorce. (RP 170)

Ms. Vu was represented at trial by counsel (RP 5) and had the assistance of a Vietnamese interpreter through trial. (RP 66)

During trial, the parties agreed to mutual restraining orders post dissolution. (RP 173) The parties also agreed to enforce the prenuptial agreement as to division of assets and liabilities. (RP 390-391)

1. When Ms. Vu was shaking the court adjourned to allow her to go to a medical center for treatment.

On the third day of trial, when Ms. Vu was called for direct examination by Dang's attorney she appeared to be shaking her body which she stated she could not control. (RP 224) The court inquired,

whether she was able to continue and it was indicated she needed to go to the hospital. (RP 224). Dang moved to be restored to his home. (RP 225) Vu indicated thru counsel she was not making a claim to the house belonging to Dang. (RP 229) It was determined that it was possible trial would not reconvene for several months. The court gave Vu an roughly 45 additional days in the residence and directed her to vacate by December 1, 2013. (RP 228-232) Trial reconvened November 14, 2014. (RP 245) Vu made no further motions to remain in the home.

2. When Court Reconvened several weeks later, Vu requested and the court allowed her to take frequent breaks per her psychiatrist recommendation.

Vu asserted that her psychiatrist recommended she be given frequent breaks during her testimony. (RP 249) The trial judge made this accommodation. (RP 249) During cross examination, the court inquired whether Vu would be more comfortable testifying from counsel table. (RP268-269) Vu indicated she would and this accommodation was also made. (RP 269) Vu testified for several days. (RP243, 344)

3. Vu agrees to divide assets and liabilities per the prenuptial agreement.

At trial it became evident that Vu was not being forthright with the court regarding her available assets in the spreadsheet she submitted. (RP

380-383) Once the assets were accurately identified, the court questioned why she would request fewer assets when the prenuptial agreement gave her a larger share of community assets. (RP 386) After conferring with her attorney and the interpreter she stipulated to the larger share of assets under the prenuptial agreement. (RP 387-391)

The trial court's decision was limited to the issues of spousal maintenance, reimbursement of expenses made by Vu in Dang's house and whether Ms. Vu was intransigent based upon her failure to disclose assets during the case and at trial. (RP 424-436) The trial court denied spousal maintenance to Vu. (RP 426-429) The trial court awarded Vu several post separation expenses she paid to improve Dang's home. (RP 425) The trial court held Vu intransigent for her misrepresentations regarding assets available to her on the date of separation. (RP 435)

The Court of Appeals affirmed Judge John Erlick's decision on all grounds. The Court found Vu unequivocally agreed to the stipulation of division of assets in open court. (Dec. page 4-5) The Court noted the trial judge expressly considered the factors relevant to spousal maintenance and found that maintenance was not necessary. (Dec. page 6) The Court held that Vu's counsel represented her interest pertaining to the house. (Dec. Page 10) She raised for the first time on appeal that she thought the

trial judge was biased against her. (Dec. page 12) She falsely asserted that she was not granted a continuance for her health, when she was given a continuance, as well as other requested accommodations for her health. (Dec. page 11) She raised for the first time on appeal that her attorney intimidated her, threatened her, controlled her and did not advocate for her. (Dec. page 11)

IV REASONS WHY REVIEW SHOULD BE DENIED

1. Vu fails to identify any evidence which supports her assertion that her case involves an issue of substantial public interest.

Vu seeks review under RAP 13.4(b)(4) arguing that her case involves an issue of substantial public interest. In deciding whether a case presents issues of continuing and substantial public interest, the court is to determine the following three factors:

"(1) whether the issue is of a **public** or private nature; (2) whether an authoritative determination is desirable to provide future guidance to **public** officers; and (3) whether the issue is likely to recur". *Hart/v. Dep't of Soc. & Health Servs.*, 111 Wn. 2d 445,] 448, [759 P.2d 1206 (1988)]. A fourth factor may also play a role: the "level of genuine adverseness and the quality of advocacy of the issues". *Hart*, [111 Wn.2d] at 448. . . .²

² *Marriage of Horner*, 151 Wn.2d 884 (2004).

In *Horner*, review was accepted because the court anticipated later courts would be evaluating and applying the language of the child relocation statute and would need guidance, even though the issue had become moot in that case.³ Cases involving purely factual questions, such as whether or not all parties were signatories to an arbitration agreement are not questions involving substantial public interests.⁴ Additionally, where a party has not adequately argued and briefed an issue, the court should not consider an appeal as a matter of substantial public interest. *Id.*

Vu argues that the court should not have accepted her stipulation to divide marital and separate property pursuant to the terms of the prenuptial agreement because she did not understand the stipulation. Vu's level of understanding is a purely factual question which should have been decided by the trial court if it had been raised there; however, that issue was never raised or asserted at the trial court level. Additionally, the evidence presented to the trial court was that she understood the stipulation and accepted the agreement. (RP 390-391) The court should not accept review as Vu's stipulation is not a matter of substantial public interest.

a. Factual questions are not issues of substantial public interest.

³ 151 Wn.2d at 893

⁴ *Satomi Owner's Ass'n v. Satomi, LLC* 167 Wn.2d 781, 807-808 (2009).

Vu's allegation that her attorney coerced her or controlled her is also a factual question that should not be raised in a petition for review before the Supreme Court. Any criticism Vu may have of her attorney should not occur in a case against Dang. If Vu felt her attorney failed to adequately represent her, the issue should be addressed to her attorney.

b. The court's acceptance of Vu's stipulation is not evidence of judicial bias.

Vu does not demonstrate that the trial court was biased against her by accepting Vu's stipulation in open court to the division of property outlined in the prenuptial agreement. (RP 390-391). By stipulating to the division of property outlined in the prenuptial agreement, Vu removed that decision from the trial court. The trial court's indication that it appeared that Vu received more property under the terms of the prenuptial agreement than the division of assets she proposed did not indicate bias. (RP 388) If Vu believed that the court misunderstood the evidence, she was free to try to persuade the court differently. The court demonstrated no bias in looking at Vu's bank statements on the date of separation and comparing those to the spreadsheet she was asserting to the court. Vu's own actions took the decision out of the trial court's hands.

None of Vu's allegations surrounding the stipulation to accept a division of property as set forth in the prenuptial agreement are of substantial public interest. Each allegation made by Vu relates more to her own private interests, are not subject to recur, and amount to private grievances. Vu asks the Supreme Court to make a determination of her competence without any evidence before it demonstrating incompetence.

2. Ms. Vu fails to present any evidence which supports her claim that she was denied access to justice.

a. There is no right to counsel in a civil case.

The argument that a party's access to justice is impeded can arise in the context of whether or not a party has effective assistance of counsel in a criminal matter, or in cases involving fundamental liberty interests or fundamental rights, whether a party has the right to an attorney at public expense.⁵ As the court of appeals noted, Ms. Vu cited no authority which would support that she is entitled to effective counsel in a civil case. (Decision, page 11). However, the allegation that her attorney failed to advocate for her in this case is simply not supported by the evidence.

The record amply demonstrates that Ms. Vu's attorney provided her adequate and professional representation. Ms. Vu's attorney made and

⁵ *In re Marriage of King*, 162 Wn.2d 378, (Wash. 2007)

responded to motions in limine. (RP 3-17) Ms. Vu's attorney offered roughly 35-40 exhibits in support of her case. (RP 347-348) Ms. Vu's attorney obtained a Vietnamese interpreter for her to insure that the trial occurred in her native language. (RP 72-73) Ms. Vu's attorney had Ms. Vu testify for roughly an entire day (RP 320-353), tried to rehabilitate Ms. Vu on cross examination, and tried to obtain as much money as she could for Ms. Vu. (RP 389) Ms. Vu's attorney also cross-examined Mr. Dang. (RP 174)

Regardless, unlike a criminal matter where the state may bear some responsibility to protect the rights of a defendant, if Ms. Vu feels her attorney was ineffective, her remedy in such event would not be against Mr. Dang.

There is no evidence or authority supporting Vu's allegation that she was under duress from her attorney, or that her attorney controlled her or failed to explain matters. These allegations are not a part of the court record. During the trial, when offered the opportunity to sit next to her attorney rather than on the witness stand, she expressed gratitude to be sitting by her attorney. (RP 269).

- b. There is no evidence that the Judge was biased against Ms. Vu.

At no time prior to, or during the trial, did Ms. Vu assert that the Court was biased against her. Having failed to raise the issue below, she should be held to have waived it on appeal.⁶ A party may not speculate upon what rulings the court will make on propositions involved in the case and, if the rulings do not happen to be in the party's favor, then for the first time raise the issue on appeal.⁷

There is no evidence in the record that Judge Erlick's conduct was biased or appeared unfair towards Ms. Vu. "To prevail under the appearance of fairness doctrine, the claimant must provide some evidence of the judge's . . . actual or potential bias[,]";⁸ prejudice is not presumed,⁹ "The test is whether a reasonably prudent and disinterested observer would conclude [that the claimant] obtained a fair, impartial, and neutral trial."¹⁰ In addition, the court is to consider allegedly improper or biased comments in context.¹¹

Judge Erlick's rulings appear fair and even handed from the motions in limine (RP 3) to his final rulings regarding reimbursements for

⁶ *Marriage of Wallace*, 111 Wn.App. 697 (2002).

⁷ *In re Welfare of Carpenter*, 21 Wn. App. 814, 820, 587 P.2d 588 (1978).

⁸ *State v. Dugan*, 96 Wn. App. 346, 354, 979 P.2d 885 (1999)

⁹ *State v. Dominguez*, 81 Wn. App. 325, 328-30, (1996).

¹⁰ *Dominguez*, 81 Wn. App. at 330.

¹¹ See *Wells v. Whatcom County Water Dist. No. 10*, 105 Wn. App. 143, 158, 19 P.3d 453 (2001); *In re Dependency of O.J.*, 88 Wn. App. 690, 697, 947 P.2d 252 (1997), review denied, 135 Wn.2d 1002, 959 P.2d 126 (1998).

changes made to Mr. Dang's home which Mr. Dang neither wanted nor authorized. (RP 424-425)

Throughout the several days of trial, Judge Erlick made multiple accommodations to Ms. Vu regarding her health. (CP 339-343) The court adjourned on the third day of trial completely, giving Ms. Vu a continuance for several weeks to allow her to seek treatment. (RP 235). The court allowed Ms. Vu to take frequent breaks based upon her counsel's representation that this would assist Ms. Vu in tolerating the trial days. (RP 249) The court allowed Ms. Vu to testify from counsel table during cross examination. (RP 269). Judge Erlick encouraged both sides equally to move their cases along. (RP 158, RP 291).

In fact, there is no evidence in the record or the file, nor in any post trial motions, as to any letters drafted by Ms. Vu to the Chief Civil Judge, or from the Chief Civil Judge to Judge Erlick. However, even if such correspondence did occur, Ms. Vu herself cannot create a basis for bias in a judge once she has accepted that judge and once he has made a decision in the case. In *Mayberry v. Pennsylvania*,¹² the United States Supreme Court observed, "[W]e do not say that the more vicious the attack on the judge the less qualified he is to act. A judge cannot be driven out of a

¹² 400 U.S. 455, 463, 91 S. Ct. 499, 27 L. Ed. 2d 532 (1971)

case.”¹³ There is no evidence that the Judge received a copy of Ms. Vu’s letter from Chief Civil Judge regarding Vu’s complaint.

Ms. Vu alleges the court was biased because she was ordered to vacate Mr. Dang’s home before she wanted to. Ms. Vu requested that she be allowed sixty days before vacating the home. (RP 232-233) Mr. Dang requested that she vacate within thirty days. (RP 231-232) The court gave Ms. Vu forty-five days to vacate the home. (RP 231-233) Ms. Vu complains that when making its final ruling, the court made comments that she was residing in Mr. Dang’s home without paying rent, but this was a true fact. (RP 228-229)

There is no evidence that the judge was angry or yelling. The judge did at one point request a direct answer to a direct question regarding the amount of money Ms. Vu had in her account on the date of separation. (RP 383) Mr. Dang proved that Ms. Vu had over \$165,000.00 which she reduced to two cashier’s checks. (Exhibit 39, page 79) Ms. Vu did not disclose this money on the spreadsheet she submitted to the court. (RP 379) Even though there was an exhibit sitting directly in front of her which stated the amount of money she had in the account, she would not admit the funds she had and the court had to take a recess to ask

¹³ 400 U.S. at 463-64.

that Ms. Vu and her attorney look at the exhibit. (RP 379-380, EX 39, page 79) The time to trace the monies going into this account was nearly two days of examining detailed bank statements. The court sought a direct answer to its question to Ms. Vu. Discerning the truth is the court's function and is not an indication of bias.

c. Ms. Vu was able to testify for two days regarding all the issues in the case.

Ms. Vu testified for two days regarding the assets and liabilities in the case, the financial position of each party and the reasons she wanted spousal support.¹⁴ (RP 336) She submitted a financial declaration and multiple exhibits regarding finances. (RP 319, Ex.48, RP 413-414) It is clear from the court's rulings that the court considered her evidence and her arguments. (RP 427-428) Ms. Vu was given some of the relief she requested, and some of the relief was not supported by the law. (RP 425)

During Ms. Vu's two days of testimony, she never alleged she didn't understand what was happening to her. But most important, she does not present the court with any way in which she would have better understood the trial or how the public would be better protected were they standing in her shoes. She had an attorney, she had an interpreter in her

¹⁴ The parties agreed to mutual restraints so extensive testimony by each party was not taken regarding respective marital abuses.

primary and first language. She claims she was too ill to understand what was happening, but, when she was ill, court recessed and did not reconvene until she was permitted to do so by her doctor. (RP 249) Moreover, the court accommodated the requests made by her attorney on her behalf per the recommendations of her doctor. (RP 249) She presented no medical evidence at trial that supports that she failed to understand the proceeding. (Decision page 11) She presented no evidence at a post trial motion that there was medical evidence that her attorney failed to present which would have been material to her case.

3. The court rulings on spousal maintenance, reimbursement of expenses, and intransigence were all related to private interests and the court considered the evidence without bias and applied the law to the evidence.

a. Spousal maintenance was properly denied.

Ms. Vu's financial declaration demonstrated that her income met her expenses. In addition to having sufficient income to meet her expenses, Ms. Vu was also able to contribute to a retirement plan and to personal savings. The Court of Appeals found that the court correctly applied the factors set forth in RCW 26.09.090. (Decision page 6) The court found that she was awarded assets with a value of approximately

\$275,000.00, exclusive of her pension plan, which was enough to support her financial needs.

Ms. Vu's allegation that the judge was biased against her because he did not award her spousal maintenance so she could increase her savings was completely devoid of merit. The court of appeals correctly found this position to be frivolous.

b. Ms. Vu was intransigent.

Ms. Vu incorrectly asserts that the court found her to be intransigent for contesting the case. In fact, the court found her to be intransigent for making direct and ongoing misrepresentations regarding her available assets. (RP 434) Ms. Vu was correctly found to be intransigent for concealing assets, resulting in two additional days of trial to trace her actions, which included transferring funds out of several different bank accounts into one account, then reducing the balance in that account to a cashier's check which she then removed to a safety deposit box. (RP 377, 379, 382) At trial, she failed to disclose these funds on her spreadsheet. (RP 434-435) To prove the existence of these funds, Dang had to admit into evidence multiple bank statements, identify each transfer by line, then follow each transfer into the various accounts into which she transferred the funds. Because she continually denied having these funds,

then had to admit that she took these funds, the court found her to be intransigent. (RP434-435). Intransigent conduct includes making a trial unduly difficult with increased legal costs.¹⁵ The court should deny review of the finding of intransigence as there is no substantial public interest in protecting conduct such as Ms. Vu's.

c. Vu's personal expenses post separation were properly denied.

Ms. Vu's decision to change the locks and install a different alarm system on Mr. Dang's separate property home was not an expense incurred on behalf of the community. Vu's action to live in Dang's home and change the locks on the doors did not benefit Dang. Maintaining Dang's home did not require Vu to change the locks or install a different alarm system.

There was no evidence that Vu's medical expenses were incurred because of Mr. Dang. Vu is not qualified to make such a diagnosis and no testimony was presented by any expert which substantiates such an allegation. (RP 355-356).

4. Dang should be awarded attorney's fees to answer the petition for review.

¹⁵ *In re Marriage of Greenlee*, 65 Wn. App. 703, 708, (1992).

Ms. Vu's petition for Supreme Court review does not present any issues of a substantial public interest. Ms. Vu's allegations are unsupported by the evidence in the record. Her prior intransigence demonstrates her willingness to make misrepresentations for financial gain. Mr. Dang was awarded attorney's fees on appeal for frivolous appeal. The court can award attorney's fees for having to answer the petition if it is without merit. RAP 18.1(j) Mr. Dang seeks an award of attorney's fees.

V. CONCLUSION

Vu's petition fails to support her allegation that her claims involve a substantial public interest. Ms. Vu failed to present any evidence supporting her contentions that would support the allegations she made both to the court of appeals and to this court. Even if Ms. Vu had such evidence that she felt inadequately represented, her claims are of a private nature and do not involve the public. Ms. Vu's allegations against the trial judge are completely without merit and all rulings of the court demonstrate that Ms. Vu's evidence was considered by the court and that the court applied the law evenhandedly. The other issues raised by Ms. Vu pertaining to the date of separation determination, and service of process do not merit review or even an answer as there is no legal basis for Ms. Vu's position.

Respectfully submitted this 2nd day of June, 2014.

A handwritten signature in black ink, appearing to read "Emily J. Tsai", written over a horizontal line.

Emily J. Tsai, WSBA #21180
Attorney for Respondent Vinh Dang

DECLARATION OF SERVICE

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

That on June 23, 2014, I arranged for service of the Answer to Petition for Review, to the court and to the parties to this action as follows:

Office of Clerk Supreme Court of Washington PO Box 40929 Olympia, WA 98504-0929	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email
Anh-Thu Thi Vu 126 SW 148 th Street Suite C-100 PMB #459 Seattle, WA 98166	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail
	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail

Dated at Seattle, Washington this 23rd day of June, 2014.



Marcus A. Barnes Cannon
Legal Assistant to Emily Tsai

OFFICE RECEPTIONIST, CLERK

From: OFFICE RECEPTIONIST, CLERK
Sent: Monday, June 23, 2014 3:03 PM
To: 'Marcus Cannon'
Cc: emily@tlclawco.com; Todd DeVallance; phil@tlclawco.com
Subject: RE: In re the Marriage of: Vinh Quoc Dang v. Anh-Thu Thi Vu (Court of Appeals No. 69747-1-1): Answer to Petition

Rec'd 6-23-14

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Marcus Cannon [mailto:marcus@tlclawco.com]
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To: OFFICE RECEPTIONIST, CLERK
Cc: emily@tlclawco.com; Todd DeVallance; phil@tlclawco.com
Subject: In re the Marriage of: Vinh Quoc Dang v. Anh-Thu Thi Vu (Court of Appeals No. 69747-1-1): Answer to Petition
Importance: High

To whom it may concern,

Please find attached Respondent's Answer to Petition in the aforementioned matter.

Kind Regards,

Marcus Barnes Cannon
Legal Assistant
Tsai Law Company, PLLC
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Seattle, WA 98121
Phone: 206-728-8000
Fax: 206-728-6869

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