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FILED
2019 MAR 15 03:24 PM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE #: 18-3-05993-7 SEA

IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

IN RE THE MARRIAGE OF:

NO. 18-3-05993-7 SEA

SONYA K. DELANCE,

MOTION FOR TEMPORARY
FAMILY LAW ORDER

Petitioner,

Clerk's action required

and

MICHAEL A. DELANCE,

Respondent.

Motion for Temporary Family Law Order

To both parties:

Deadline! Your papers must be filed and served by the deadline in your county's Local Court Rules, or by the State Court Rules if there is no local rule. Court Rules and forms are online at www.courts.wa.gov.

If you want the court to consider your side, you **must**:

- File your original documents with the Superior Court Clerk; AND
- Give the Judge/Commissioner a copy of your papers (if required by your county's Local Court Rules); AND
- Have a copy of your papers served on all other parties or their lawyers; AND
- Go to the hearing.

The court may not allow you to testify at the motion hearing. Read your county's Local Court Rules, if any.

Bring proposed orders to the hearing.

To the person filing this motion:

You must schedule a hearing on this motion. You may use the *Notice of Hearing* (form FL All Family 185) unless your county's Local Court Rules require a different form. Contact the court for scheduling information.

1 **To the person receiving this motion:**

2 If you do not agree with the requests in this motion, file a statement (using form FL All
3 Family 135, *Declaration*) explaining why the court should not approve those requests.
4 You may file other written proof supporting your side and propose your own *Parenting
Plan* or *Child Support Worksheets*.

5 1. My name is Sonya DeLance. I ask the court for temporary orders approving the
6 requests listed below.

7 **2. Children**

8 I want my children under 18 listed below to be included in the court's orders:

Child's name	Age
1. Presley J. DeLance	8
2. Ella J. DeLance	7

11 **3. Active duty military**

12 *The federal Servicemembers Civil Relief Act covers:*

- 13 *Army, Navy, Air Force, Marine Corps, and Coast Guard members on active
14 duty;*
- 15 *National Guard or Reserve members under a call to active service for more
16 than 30 days in a row; and*
- 17 *commissioned corps of the Public Health Service and NOAA.*

18 *The state Service Members' Civil Relief Act covers those service members listed
19 above who are either stationed in or residents of Washington state, and their
20 dependents, except for the commissioned corps of the Public Health Service and
21 NOAA.)*

22 My spouse/domestic partner is **not** covered by the state or federal Service
23 Members' Civil Relief Acts.

24 **4. Care of children**

25 Appoint a person to investigate and report to the court about what is in the
26 children's best interest, and order who will pay this person's fees. This person
should be an:

- Evaluator/Investigator, selected by Wife; and
- Other: Parenting Coordinator, selected by Wife.

5. Provide support

Other: Sonya K. DeLance shall have discretion to transfer up to \$37,000 per
month from the Bernstein Account into the Bank of America Account ending 2741 or
Bank of America Account ending 5962. Sonya K. DeLance shall have exclusive use of

1 Bank of America Account ending 2471 or Bank of America Account ending 5962.
2 Michael A. DeLance shall sign whatever letters of authorization are necessary to permit
3 her to do so.

3 **6. Family home**

4 **Stay in the home**

5 I want to continue living in the family home, consistent with the Temporary
6 Order entered November 1, 2018.

6 **7. Use of property**

7 No new request – maintain use of property, consistent with the Temporary Order
8 entered November 1, 2018, except as follows:

9 Sonya K. DeLance shall have exclusive use of Bank of America Account
10 ending 2471 or Bank of America Account ending 5962. Michael DeLance is
11 prohibited from using these accounts.

12 Sonya K. DeLance is authorized to transfer up to \$40,000 per month from the
13 Bernstein Account into the Bank of America Account ending 2741 or Bank of
14 America Account ending 5962 to pay expenses identified in Paragraph 9
15 below.

16 Michael DeLance shall have exclusive use of Bank of America Account
17 ending 2989.

18 Michael A DeLance shall be prohibited from withdrawing more than \$20,000
19 each month from the Bernstein Account without prior written approval of
20 Wife (through counsel).

16 **8. Protect property**

17 No new request, consistent with the Temporary Order entered November 1, 2018.

18 **9. Household expenses**

19 Order household expenses to be paid as follows:

Expense	Who should pay
<input checked="" type="checkbox"/> Mortgage, Utilities, Housecleaning, Home Assistant, and Landscaping re: Family Home	<input checked="" type="checkbox"/> Petitioner <input type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Rent, Utilities, and other expenses for Husband's Home	<input type="checkbox"/> Petitioner <input checked="" type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Rent, Utilities, and other expenses for Husband's Home	<input type="checkbox"/> Petitioner <input checked="" type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Homeowner's Insurance & Property Taxes on Family Home	<input checked="" type="checkbox"/> Petitioner <input type="checkbox"/> Respondent

Expense	Who should pay
<input checked="" type="checkbox"/> Husband's Vehicle Payment	<input type="checkbox"/> Petitioner <input checked="" type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Wife's Vehicle Payment	<input checked="" type="checkbox"/> Petitioner <input type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Boat Payment – TBD	<input type="checkbox"/> Petitioner <input type="checkbox"/> Respondent
<input checked="" type="checkbox"/> RV Payment – TBD	<input type="checkbox"/> Petitioner <input type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Cabo Timeshare – TBD	<input type="checkbox"/> Petitioner <input type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Husband's or Wife's Medical Bills for services prior to and including 3/14/19 – To be Paid in Full from Bernstein Trust Account, by Petitioner	<input checked="" type="checkbox"/> Petitioner <input type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Husband's or Wife's Medical Bills for services after to 3/14/19 – To be paid in by the party who incurred the expense	<input checked="" type="checkbox"/> Petitioner <input type="checkbox"/> Respondent
<input checked="" type="checkbox"/> California Closets Bill, outstanding as of 3/11/19 - To be Paid in Full from Bernstein Trust Account, by Petitioner	<input checked="" type="checkbox"/> Petitioner <input type="checkbox"/> Respondent
<input checked="" type="checkbox"/> Children's Tuition – To be Paid in Full from Bernstein Trust Account, by Petitioner	<input checked="" type="checkbox"/> Petitioner <input type="checkbox"/> Respondent

10. Divide debts

- Each be responsible for his/her own future debts, including debt from credit cards, loans, security interest, and mortgages.

11. Do not change insurance

- No new request, consistent with the Temporary Order entered November 1, 2018.

12. Pay fees and costs

- Order my spouse/domestic partner to:
- Pay other professional fees and costs for this case. *Amount:* \$ _____
to _____
for Parenting Coordinator
- Order the following lawyer fees and professional fees be paid from the Bernstein Trust account, by Petitioner:
- Wife's lawyer's fees for outstanding as of February 28, 2019, in the amount of \$ _____ to Molly Kenney and \$ _____ to Beresford Booth PLLC.

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Other professional fees and costs for appointment of a Parenting Evaluator in this case, but not to exceed \$ _____ without agreement of the parties or further Court order.

13. Restraining Order

No new request, consistent with the Temporary Order entered November 1, 2018.

14. Other temporary orders

No new request, consistent with the Temporary Order entered November 1, 2018.

➤ Reasons for my requests

15. Why are you asking the court for the orders you checked above?

See Declaration of Sonya DeLance, dated March 14, 2019.

I declare under penalty of perjury under the laws of the state of Washington that the facts I have provided on this form are true.

Signed at (city and state): _____ Date: _____

▶ See Declaration filed 3/14/19
Sonya K. DeLance, Petitioner

I agree to accept legal papers for this case at:

my lawyer's address, listed below.

Lawyer (if any) fills out below:

▶ [Signature] _____ 3/14/19
Dimitra S. Scott, WSBA No. 34634 Date

*Dimitra S. Scott
Beresford Booth, PLLC
145 Third Avenue S.
Edmonds, WA 98020
dimitras@beresfordlaw.com*

Warning! Documents filed with the court are available for anyone to see unless they are sealed. Financial, medical, and confidential reports, as described in General Rule 22, **must** be sealed so they can only be seen by the court, the other party, and the lawyers in your case. Seal those documents by filing them separately, using a *Sealed* cover sheet (form FL All Family 011, 012, or 013). You may ask for an order to seal other documents.