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6 CASE #: 18-3-05993-7 SEA

7
8 **IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY**

9 IN RE THE MARRIAGE OF:

NO. 18-3-05993-7 SEA

10 SONYA DELANCE,

Petitioner,

**PETITIONER'S EX PARTE
MOTION TO APPOINT SPECIAL
MASTER AND OTHER RELIEF**

11 and

12 MICHAEL DELANCE,

Respondent.

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15 **I. RELIEF REQUESTED**

16 Petitioner, by and through her counsel of record, BERESFORD BOOTH PLLC,
17 respectfully requests the court issue an order for the following relief:

18 1. Appoint attorney Richard D. Wurdeman Special Master in this case and
19 grant him authority, on behalf of the Respondent, Michael DeLance, to execute all
20 documents necessary to accomplish the transfer of Tarukino/SorSETech stock to Sonya
21 DeLance as required by the parties Decree of Dissolution, the subsequent CR2A
22 Agreement executed on November 26, 2021, and the Order Enforcing the CR2A
23 Agreement entered on February 15, 2022.

24 2. Order that all fees for the appointment of the Special Master shall be borne
25 by the Respondent, Michael DeLance, including attorney's fees and costs for having to file
26 this motion.

3. For any other relief the court deems equitable.

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II. STATEMENT OF FACTS

Please see the Declaration of Counsel filed herewith and incorporated herein.

IV. EVIDENCE RELIED UPON

- 1. The Decree of Dissolution which incorporated the parties' Property Settlement Agreement executed on April 22, 2019.
- 2. The CR2A Agreement executed on November 26, 2021.
- 3. The Order Enforcing the CR2A Agreement entered on February 15, 2022.
- 4. All pleadings and records on file herein.

V. AUTHORITY

Based on the parties Decree of Dissolution, the subsequent CR2A Agreement executed on November 26, 2021, and the Order Enforcing the CR2A Agreement entered on February 15, 2022 and the Respondent's refusal to respond or follow court orders, the Petitioner requires relief to effectuate the transfer of personal property that has repeatedly been court-ordered. This provision the primary basis for relief, as well as the common law regarding the application and enforcement of contracts. See also RCW 26 et. seq.

A proposed Order is submitted herewith.

Dated: February 25, 2022

BERESFORD BOOTH PLLC

By: Anne B. Bennette
WSBA No. 50240
Attorneys for Petitioner