1 FILED 2022 MAR 03 12:40 PM 2 KING COUNTY SUPERIOR COURT CLERK 3 E-FILED CASE #: 18-3-05993-7 SEA 4 5 6 7 IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY 8 IN RE THE MARRIAGE OF: NO. 18-3-05993-7 SEA 9 10 PETITIONER'S MOTION TO SONYA DELANCE, APPOINT SPECIAL MASTER Petitioner. 11 AND OTHER RELIEF and 12 MICHAEL DELANCE, Respondent. 13 14 I. RELIEF REQUESTED 15 Petitioner, by and through her counsel of record, BERESFORD BOOTH PLLC, 16 respectfully requests the court issue an order for the following relief: 17 Appoint attorney Richard D. Wurdeman Special Master in this case and 1. 18 grant him authority, on behalf of the Respondent, Michael DeLance, to execute all 19 documents necessary to accomplish the transfer of Tarukino/SoRSETech stock to Sonya 20 DeLance as required by the parties Decree of Dissolution, the subsequent CR2A 21 Agreement executed on November 26, 2021, and the Order Enforcing the CR2A 22 Agreement entered on February 15, 2022. 23 Appoint attorney Richard D. Wurdeman Special Master in this case and 2. 24 grant him authority, on behalf of the Respondent, Michael DeLance, to execute all 25 documents necessary to allow the Petitioner to travel with the minor children. 26

MOTION - 1

- 3. Order that all fees for the appointment of the Special Master shall be borne by the Respondent, Michael DeLance, including attorney's fees and costs for having to file this motion.
 - 4. For any other relief the court deems equitable.

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. The Final Parenting Plan entered on February 15, 2022.
 - 5. 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, the Final Parenting Plan 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 and to sign a consent form allowing her to travel with the children. 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.

25

26

1	Dated: March 3, 2022	BERESFORD BOOTH PLLC
2		
3		By: Anne B. Bennette
4		WSBA No. 50240 Attorneys for Petitioner
5		inorneys for i entioner
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		

MOTION - 3

45 THIRD AVENUE SOUTH, SUITE 200 EDMONDS, WASHINGTON 98020 (425) 776-4100 · (425) 776-1700 fax