

FILED  
2022 MAY 11 03:32 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 18-3-05993-7 SEA

SUPERIOR COURT OF WASHINGTON COUNTY OF KING

In re the Marriage of:

Petitioner/s (person/s who started this case):  
Sonya Delance

And Respondent/s (*other party/parties*):  
Michael Angelo Delance

NO. 18-3-05993-7 SEA

Motion for Order on Review,  
Enforcement of CR2A and Entry of  
Orders

**Motion for Order for: Review, Enforcement of CR2A, and Entry of Orders**

***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](http://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.

**To the person receiving this motion:**

If you do not agree with the requests in this motion, file a statement (using form FL All Family 135, Declaration) explaining why the court should not approve those requests. You may file other written proof supporting your side.

**1. Relief Requested**

My name is: Michael Angelo Delance. I ask the court to approve the following orders (*specify*):

Dismiss the special master.

Entry of a Modified Decree in regards to the splitting of the shares.

**2. Statement of Issues**

I ask the court to decide the following issues (*specify*):

Whether the Special Master should be dismissed.

Whether the petitioner is entitled to only 50% of the shares across all classes.

Whether the court should approve my modified decree and other order on this motion.

**3. Statement of Facts/Grounds**

These facts support my request (*list supporting facts*):

The shares are to be evenly split according to the separation contract.

The CR2A agreement clearly exchanges the issue of my selling of the shares to repay the Bobbi loan in exchange for my forgiving the \$500,00 debt owed to me by Sonya.

Sonya and her attorney were well aware of the selling of the shares and participated in the process.

Sonya may not like that I sold the shares, but the selling of the shares happened 22 months before the CR2A agreement was signed.

At the time that Sonya signed the CR2A, she was well aware the Bobbi loan had been repaid and that it was repaid from the selling of the shares.

The CR2A forgave any and all issues not otherwise mentioned in the CR2A that were or were not disclosed.

The \$500,000 forgiveness covered other issues like spousal and child support as well.

I did not disappear on Sonya's attorney between December of 2021 and February 2<sup>nd</sup> of 2022. It was her that disappeared and used it as an excuse to have the special master appointed. The special counsel is entirely unwarranted.

**4. Evidence Relied Upon**

I ask the court to consider this evidence (*list all declarations and other documents that support this request*):

All documents contained in the clerks file.

Michael Angelo Delance's Declaration in Support of Motion for Order for Review and Entry of Orders

**5. Legal Authority**

I have the right to ask for these orders according to the law (*describe the legal authority that supports your request*):

Binding Separation Contract.

CR2A Agreement


RCW 26.09.170

6. A Proposed Order (check one):  is  is **not** attached to this Motion.

**Person asking for this order fills out below:**

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.  I have attached (number of): \_\_\_\_\_ pages.

Signed at (city and state): Bellevue, Wa \_\_\_\_\_ Date: 5/11/22 \_\_\_\_\_

 \_\_\_\_\_ Michael Angelo Delance  
Person asking for this order signs here Print name here

I agree to accept legal papers for this case at (check one):


- my lawyer's address, listed below.
- the following address (this does **not** have to be your home address):

2604 171st Ave Se  
Bellevue, Wa 98008

(Optional) email: \_\_\_\_\_

(If this address changes before the case ends, you **must** notify all parties and the court clerk in writing. You may use the Notice of Address Change form (FL All Family 120). You must also update your Confidential Information form (FL All Family 001) if this case involves parentage or child support.)

**Lawyer (if any) fills out below:**

 \_\_\_\_\_ Print name and WSBA No. \_\_\_\_\_ Date \_\_\_\_\_  
Lawyer signs here

\_\_\_\_\_  
Lawyer's street address or PO box city state zip

Email (if applicable): \_\_\_\_\_

**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.