

FILED
SUPERIOR COURT
THURSTON COUNTY, WASH.

02 APR -9 PM 5:07

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BY: [Signature]
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**SUPERIOR COURT OF WASHINGTON
FOR THURSTON COUNTY
FAMILY AND JUVENILE COURT**

In Re the Custody of:

Starcia M. Ague
Child(ren).

Kirsten M. Harris
Petitioner,

vs.

Dawna G. Riley
Respondent.

NO.

**MOTION/DECLARATION
FOR EX PARTE
RESTRAINING ORDER
AND FOR ORDER TO
SHOW CAUSE (MTAF)**

I. MOTION

Based upon the declaration below, the undersigned moves the court for a temporary order and order to show cause.

1.1 EX PARTE RESTRAINING ORDER.

A temporary restraining order should be granted without written or oral notice to Dawna G. Riley because immediate and irreparable injury, loss, or damage will result before the other party or the other party's lawyer can be heard in opposition. This order should restrain or enjoin:

Dawna G. Riley from molesting or disturbing the peace of Starcia M. Ague.

Dawna G. Riley from going onto the grounds of or entering the home, work place or school of the protected person or the daycare or school of these children: Starcia M. Ague.

Dawna G. Riley from knowingly coming within or knowingly remaining within _____ (distance) of the home, work place or school of the other party or the day care or school of the following children: Starcia M. Ague.

Dawna G. Riley from removing any of the children from the State of Washington.

MOTION/DECLARATION FOR EX PARTE RESTRAINING ORDER

WPF DR 04.150 (9/2001)

CR 65(b); RCW 26.09.060 - Page 1

1
2 other restraints:
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5 The other party should be required to appear and show cause why these restraints
6 should not be continued in full force and effect pending final determination of this
7 action.

8 **1.2 SURRENDER OF DEADLY WEAPONS.**

9 Does not apply.

10 (IF THIS BOX IS CHECKED, CLEAR AND CONVINCING REASONS FOR
11 THIS REQUEST MUST BE PRESENTED IN PARAGRAPH 2.3 BELOW.)
12 The court should require _____ to surrender any
13 deadly weapon in his or her immediate possession or control or subject to his
14 or her immediate possession or control to the sheriff of the county having
15 jurisdiction of this proceeding, to his or her lawyer or to a person designated
16 by the court.

17 **1.3 OTHER TEMPORARY RELIEF.**

18 Does not apply.

19 _____ should also be required to appear and
20 show cause why the court should not enter a temporary order which:

21 grants the petitioner custody of the following children:

22 Gives reasonable visitation to _____.

23 orders child support as determined pursuant to the Washington State
24 Support Schedule.

25 orders him or her to pay temporary attorney's fees, other professional
26 fees and costs in the amount of \$ _____ to:

27 appoints a guardian ad litem/investigator/lawyer on behalf of the
28 minor children.

other:

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2
3 **1.4 OTHER:**
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5
6 Dated: April 9, 02

Kirsten M Harris
Signature of Moving Party
Address: 223 Lark St SW
Tumwater WA 98512
Phone: 360-252-1400
Kirsten Harris
Print or Type Name

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12 **II. DECLARATION**

13 **2.1 INJURY TO BE PREVENTED.**

14 The ex parte restraining order requested in paragraph 1.1 above is to prevent the following injury (define the injury):

15 From any intentional (or unintentional) harm
16 to Starcia M. Ague, and to prevent her from
17 removing Starcia from my home.

18 **2.2 REASONS WHY THE INJURY MAY BE IRREPARABLE.**

19 This injury may be irreparable because:

20 Starcia has deep emotional problems
21 and is terrified of both parents.
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24 **2.3 CLEAR AND CONVINCING REASONS WHY WEAPONS SHOULD BE SURRENDERED.**

25 Does not apply.

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27 _____ should be required to surrender any
28 deadly weapons as requested in paragraph 1.2 above because of following clear and convincing reasons:

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2.4 REASONS FOR A TEMPORARY ORDER.

Does not apply.

It is necessary that the court issue a temporary order with the relief requested in paragraph 1.3 above for the reason set forth below.

This is to prevent ~~prevent~~ Dawna G. Riley from taking Starcia from my home - Starcia is deeply emotionally scared and terrified of her mother. Mom is seeking support from felons to accomplish the forceful removal of her daughter.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Olympia WA, on April 9, 2002
(City and State) (Date)

Kirsten M. Harris
Signature
Kirsten M. Harris
Print or type name

DO NOT ATTACH FINANCIAL RECORDS TO THIS DECLARATION. FINANCIAL RECORDS SHOULD BE SERVED ON THE OTHER PARTY AND FILED WITH THE COURT SEPARATELY USING THE SEALED FINANCIAL SOURCE DOCUMENTS COVER SHEET (WPF DRPSCU 09.0220). IF FILED SEPARATELY USING THE COVER SHEET, THE RECORDS WILL BE SEALED TO PROTECT YOUR PRIVACY (ALTHOUGH THEY WILL BE AVAILABLE TO THE OTHER PARTIES IN THE CASE,

1
2 **THEIR ATTORNEYS, AND CERTAIN OTHER INTERESTED PERSONS. SEE GR**
3 **22(C)(2).**
4

5 **III. EFFORTS TO GIVE OTHER PARTY NOTICE.**

6 **The following efforts have been made to give the other party or other party's lawyer notice**
7 **and the following reasons exist why notice should not be required:**

8 Mom (Dawha G. Riley) is unstable and
9 has sought the support of felons who
10 have threatened to take Starcia and
11 "kill me" & "my family" & "burn my house
12 down."
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14
15 Dated: April 9, 2002 Kirsten M. Harris
16 **Signature of Moving Party**

17 KIRSTEN M. HARRIS
18 **Print or type name**
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