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SUPERIOR COURT OF WA.  
SHARON K. FOGO

BY: BH2 DEPUTY

21-3-00272-23  
RSP 12  
Response  
11510951



Superior Court of Washington, County of Mason

In re parenting and support of:  
Leon Jaymz Reed  
Child,

Rachel Ferrand  
Petitioner,  
and

Edward "Scott" Reed  
Respondent.

NO: 21-3-00272-23

RESPONSE TO PETITION

The State of Washington, Department of Social and Health Services (DSHS) through Michael K. Dorcy, Mason County Prosecuting Attorney, and the undersigned Deputy Prosecuting Attorney, responds to the Petition for a Parenting Plan, Residential Schedule and/or Child Support filed in this cause as follows:

1. DSHS has provided public assistance monies in the past to one or more parties of this action and arrears are owed to the State of Washington for that period.
2. The State of Washington holds by assignment and subrogation any and all right to receive and collect spousal maintenance and any and all child support due and owing recipients of public assistance, including all support due under any temporary order of this court.
3. The exact ability of the non-residential parent(s) to provide for the care of the minor child(ren) is not fully known by DSHS.
4. This Response is based upon the records and files of this case and the laws of the State of Washington.

WHEREFORE, DSHS prays:

1. That child support be determined and ordered according to the Washington State Child Support Schedule.

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2. That all unpaid support be preserved for collection.
3. That both parents be required to provide health insurance coverage for the benefit of the child(ren) and that both parents pay their proportional share of the uncovered medical/dental expenses.
4. Such other relief as this court deems appropriate.

DATED 12-8-21 in Shelton, Washington.



BAILEY J. WILCOX, WSBA #51357  
DEPUTY PROSECUTING ATTORNEY