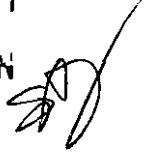


2007 MAR 13 AM 11:51

DAVID W. PETERSON



**Superior Court of Washington
County of KITSAP**

In re: the parentage of
Mildred Vedder

Child,
Scott Paul Turchin
And
Shawnie Ann Vedder

Petitioner,

Respondent / Mother

No. 07-3-00180-3

**Response to Petition for
Modification/Adjustment of
Custody Decree/Parenting
Plan/Residential Schedule
(RSP)**

To:

I. Response

1.1 Admissions and Denials

The allegations of the petition in this matter are **Admitted** or **Denied** as follows (check only one for each paragraph):

Paragraph of the Petition

1.1	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
1.2	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
1.3	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.1	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.2	<input type="checkbox"/>	Admitted	<input checked="" type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.3	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.4	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.5	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.6	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.7	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.8	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.9	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.10	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.11	<input type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input checked="" type="checkbox"/>	Lacks Information
2.11.1	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.11.2	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information



2.11.3	<input type="checkbox"/>	Admitted	<input checked="" type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.12	<input type="checkbox"/>	Admitted	<input checked="" type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.13	<input type="checkbox"/>	Admitted	<input checked="" type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.14	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.15	<input checked="" type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input type="checkbox"/>	Lacks Information
2.16	<input type="checkbox"/>	Admitted	<input type="checkbox"/>	Denied	<input checked="" type="checkbox"/>	Lacks Information

Each allegation of the petition which is denied, is denied for the following reasons [List separately]:

2.2 There is not adequate cause for a hearing. Scott is a bully and he is using the fact that I moved over two years ago as an excuse to torment me and to attempt to entirely re-write this courts original parenting plan. Scott is constantly threatening my family with the CPS, the INS, and the State Department, Homeland Security the USDA and now with this court. In the past Scott has stalked me and my friends and has called my employers and attempted to get me fired from my jobs. Also In the past I had to get a no contact order against Scott because of his constant use of threats and intimidation. Whenever Scott does not get his way he seeks vengeance. Scott will use any tool he can in order to seek vengeance against any perceived slights. Scott is trying to re-write the entire parenting plan in order to get even with me. Scott is not doing this with Millie's best interest in mind; he is doing this purely for revenge and his own self-interests.

2.11.3

There has not been any substantial change in well over two years. Scott is trying to reverse the original parenting plan in retaliation for me applying for increased child support. Scott receives more then reasonable time with Millie and he knows he can come and get her any time he wants to.

The parenting plan that we have had for the last six years has worked out quite well for all parties involved and there is no reason to tear up the status quo and reverse this courts original parenting plan. None of Scott's proposed changes are remotely in the interest of Mildred.

2.12 The original judge on this case ruled that Scott provide all transportation. The judge ruled this because I then as now do not have reliable transportation. There is no reason to reverse this courts original decision and re-write the entire parenting plan. We lived 20 miles apart when the plan was first written and now we live 35 miles apart that is not a significant change. Also I am now taking medication and my doctor has advised me to limit my driving.

Scot is a middle-aged bachelor who has no responsibilities. I have a family and two children, it is a hardship for me to provide transportation but it is no problem at all for Scott to provide transport. Scott had newer vehicles, has no family obligations, is well to do and is not taking medication that limits his driving.

Also Scott is trying to change far more then just transportation. Scott is attempting to make 15 changes to our original parenting plan as per his PPP. Why he chooses to mention only a few of the changes he wants on this petition is best known to him.

2.13

We were served eviction papers on April 1st 2004, Scott was informed of this and he helped us to move. He also toured Millie's new school ahead of the move and was very pleased that she was to be

enrolled in a bi-lingual program. Scott was also quite pleased that we were able to find a house that is directly across the street from an Elementary School. I asked Scott if he wanted me to serve him with formal court documents regarding our move and he said no. He said that he appreciated that I kept him well informed and he saw no need to involve the courts.

There is nothing at all confusing about the winter vacation schedule, Scott will have Millie for all of winter vacation next year and the year after that we split winter vacation. Scott wants to change this because I for the first time ever insisted that he follow the parenting plan this winter. When Scott does not get his way he uses and tool he can think of to try to hurt us.

Regarding the summer schedule Scott has not had Millie for a one-week continuous visitation every summer but he has always known that he is welcome to come and get her any time that it is convenient for Millie and my family. The plan is not silent as to the summer schedule the plan clearly states that the normal residential schedule will be followed in the summer. Considering that facts that Scott wanted me to get an abortion, denied paternity and showed no interest in Millie until she was three years old Scott's allowed visitation time with Millie is more then generous.

1.2 Notice of Further Proceedings

Notice of all further proceedings in this matter should be sent to the address below.

1.3 Other II. Requests

2.1 Request for Dismissal

- Does not apply.
- The nonmoving party requests that the petition be dismissed.

2.2 Request for Modification or Adjustment

- Does not apply.
- The nonmoving party requests that the court enter an order modifying or adjusting the custody decree/parenting plan/residential schedule in this matter and approving the proposed parenting plan/residential schedule, which is filed with or attached to this response. The nonmoving party also requests that the court:
 - Find there is adequate cause for hearing this matter.
 - Enter an order establishing child support in accordance with the proposed parenting plan/residential schedule. The child support worksheet and financial declaration are filed with this response.
 - Other:

2.3 Protection Order

- Enter a domestic violence protection order protecting _____ [Name]
from _____ [Name] because _____ [Name]