

FILED  
KITSAP COUNTY CLERK  
2007 FEB -7 PM 2:33  
DAVID W. PETERSON

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KITSAP

In re the Parentage of:

Mildred Vedder,

Child,

Scott Paul Turchin,

Petitioner/Father,

And

Shawnie Ann Vedder,

Respondent/Mother.

07-3-00180-3

No. 97-5-00460-1

Motion and Declaration  
for Adequate Cause

**I. Motion**


The Petitioner, by and through his attorney of record, Daniel L. Goodell of GOODELL LAW, INC., P.S., moves the Court to find adequate cause for requesting the modification/adjustment of the custody decree/parenting plan/residential schedule in this matter.

ORIGINAL

3/12

1 RESPECTFULLY SUBMITTED this 6 day of February, 2007.

2  
3 GOODELL LAW, INC., P.S.

4 

5 Daniel L. Goodell, WSBA #14790  
6 Attorney for Petitioner/Father

7 **II. Declaration**

8 It is necessary that the court issue a temporary order granting the relief requested above  
9 for the reasons set forth below.

10 My name is Scott Turchin, I am the father to Mildred Vedder and the Petitioner in this  
11 matter, and make the following Declaration based upon my personal knowledge.

12 1. **Dispute Resolution.** I tried to mediate two problems we are having in the  
13 Parenting Plan by contacting Kitsap Dispute Resolution Center and setting up an appointment.  
14 The two problems were winter break and transportation. Shawnie decided that she wanted to  
15 go to Thurston County Dispute Resolution in Olympia. Olympia is far for me to travel since I  
16 work at Keyport and live in Bremerton. Shawnie does not work, as she is on SSI, and feels that  
17 she should not have to drive to Bremerton for the mediation. Our Parenting Plan requires  
18 Kitsap County Dispute Resolution, which worked for both of us because she was living in Port  
19 Orchard and I was in Bremerton. There are some very important issues that need to be dealt  
20 with and she will not talk to me about them, and usually hangs up on me when I try to talk to  
21 her. Attached and incorporated by this reference is a copy of the letter I sent certified mail,  
22 requesting that we mediate with Kitsap Dispute Resolution.  
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2. **Winter Vacation.** The winter vacation schedule was set forth in 3.7 of the previous order entered on March 22, 2001. The way the current Parenting Plan is written up, I was not allowed to visit with Mildred over Christmas vacation at all for 2006. I am requesting that the Parenting Plan be simplified, where we alternate every other year.

3. **Delay Provision.** Also, in the current Parenting Plan under the school schedule, it states that if the father is more than 30 minutes late, visitation is cancelled for that weekend. I find that unfair, as I have always been on time and usually the mother is the one who was late whenever we met halfway, and I was left waiting. I would like this language taken out of the Parenting Plan.

4. **Summer Schedule.** There are no provisions for the summer schedule in the order. I have been having visitation every other weekend, consistent with the school schedule. In addition, I have been having a one-week visitation during the summer. I would like to keep the one-week visitation, in addition to the every other weekend schedule. I have addressed the vacation in Section 3.6 of the Parenting Plan. I am requesting one week of vacation time with our daughter in addition to every other weekend during the summer.

5. **Transportation.** Transportation has been a nightmare. When the order was entered, Shawnie lived in Port Orchard. In February of 2005, Shawnie moved to Shelton. I still live in Bremerton, so now, I have to drive from Bremerton to Shelton and that is quite a distance to drive both ways. When Shawnie moved from Port Orchard to Shelton, I was not given proper notice. Initially, for a period of about 10 months to a year, Shawnie would meet me half way in Allyn, but in September, she stopped meeting me half way and is making me

1 drive all the way to Shelton for pick-ups and drop-offs. There have been quite a few times that  
2  
3 Shawnie scheduled events for Mildred on my visitation weekend which does not give me  
4 uninterrupted quality time with our daughter. I am requesting that the receiving party provide  
5 transportation.

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

8 Signed at Belfair, Washington, this <sup>14th</sup> 6 day of February, 2007.

9  
10   
11 Scott Turchin, Petitioner/Father

December 11, 2006

Shawnie Vedder  
1017 Franklin St  
Shelton, WA 98584

Ms. Vedder,

I contacted Kitsap Dispute Resolution center to resolve this issue regarding transportation.

In response, you have refused to come to Kitsap County Dispute Resolution center and demanded that I go to Olympia.

Your demands are not consistent with the requirement of the parenting plan.

I consider this a refusal to go through mediation as required by the parenting plan currently in effect.

I am willing to give this one more opportunity but you will need to schedule mediation through Kitsap County Dispute Resolution center ten days from receipt of this letter or I will file a motion before the court.

Sincerely,



Scott Turchin

cc: Daniel Goodell  
Goodell Law Inc.  
PO Box 1821  
Belfair, WA 98528