

EXPEDITE (If filed within 5 court days of hearing)

Hearing is set:

Date:

Time:

Zoom #:

Rm:

Judge/Calendar:

**Superior/District Court of Washington
for _____ County Family Ct.**

In re: (children's names/etc.)

Party's name(s), petitioner/plaintiff,

v.

2nd Party's name(s), respondent/defendant

No.:

Party's name MOTION for:

[identify relief sought, one per motion, file separate motion for each]

Clerk's action required

[list all RCW's, federal laws, & WA/local Court Rules relied on]

TO: Court Clerk [list name, title, address, e-mail address, phone #, fax #], AND
[list all parties' names, title, address, e-mail address, phone #, fax #], AND
[list all attorneys of record, their bar #, who they represent, their address, e-mail address, phone #, fax #]

I(a) Identity of Moving party

1(a).1 COMES now [name of moving party/assignee] seeking the relief in part II.

I(b) Basis of Jurisdiction

1(b).1 [State the basis for subject matter jurisdiction or the lack thereof. It is good practice to include/deny this basis in EVERY pleading even though previously cited, and explicitly reserve/continue objection to jurisdiction if valid at every stage of the litigation or it will be deemed waived upon appeal. The defense must renew its objection at the beginning of its case/presentation.]

1(b).2 [State the basis for in personum jurisdiction or the lack thereof. It is good practice to include/deny this basis in EVERY pleading even though previously cited, and explicitly reserve/continue objection to jurisdiction if valid at every stage of the litigation or it will be deemed waived upon appeal. The defense must renew its objection at the beginning of its case/presentation.]

Motion Name & Affidavit in support:
[e-mail address]

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[Party's name] [Ph. #]
[Mailing Address]

II RELIEF SOUGHT

2.1 [State the relief sought. Be brief. For example: Substitution of John Doe as respondent in place of Alvin Jones.]

III Sworn Statement of Material & Relevant facts

3.1.1 [a succinct statement of the facts contended to be material/relevant. Do NOT use this section to present arguments.]

3.1.2 [list/cite the facts chronologically.]

3.2.1 {Do not speculate or cite hearsay. Opine only if you are a genuine expert on a topic/subject.]

3.2.2 [etc.]

3.3.1 [sign & print your name under penalty of perjury of the laws of Washington State.]

I declare under penalty of perjury of the laws of the State of Washington and pursuant to GENERAL Court RULE 13 and RCW 9A.72.085 that the foregoing is true and correct to the best of my knowledge.

Signed at _____ County, _____ State on _____ [Date]

Signature of Petitioner or Lawyer/WSBA No.

_____, pro se
Print Name

IV Statement of Issues

4.1.1 [A concise statement of the issue or issues **of law** upon which the Court is requested to rule.]

4.2.1 [etc.]

Motion Name & Affidavit in support:
[e-mail address]

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[Party's name] [Ph. #]
[Mailing Address]

V Evidence Relied Upon

5.1.1 [Attach and enumerate exhibits to accompany motion. Cite with particularity the exhibit number, title, page and sentence/line number each point relies upon.]

5.1.2 [The evidence on which the motion or opposition is based must be specified with particularity. Deposition testimony, discovery pleadings, and documentary evidence relied upon must be quoted verbatim or a photocopy of relevant pages must be attached to a declaration identifying the documents. Parties should highlight those parts upon which they place substantial reliance. Copies of cases shall not be attached to original pleadings. Responsive pleadings shall conform to this format.]

5.2.1 [etc.]

...

VI Argument, Points & Authorities

6.1.1 [Sync every line item herein with the item numbers in III through V rigorously and expand the subsidiary numbering as needed to further your arguments. This will hyper organize your pleading for both yourself and the judge.]

6.1.2 [Any legal authority relied upon must be cited. Copies of all cited non-Washington authorities upon which parties place substantial reliance shall be provided to the hearing judicial officer and to counsel or parties, but shall not be filed with the clerk. See LCR 5(k) in King Co.]

6.2.1 [Always sign, print and date your signature as respectfully submitted by...]

Respectfully signed & submitted at/in _____ County, Washington State on [Date].

X _____
Signature of Petitioner or Lawyer/WSBA No.
_____, pro se
Print Name

Motion Name & Affidavit in support:
[e-mail address]

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[Party's name] [Ph. #]
[Mailing Address]

**I have e-mailed a copy of this entire document to [Name(s)],
attorney(s) or pro se for the [Name(s)] & not [Name(s)] on [Date].**

Signed at _____ County, Washington State on [Date].

Respectfully Submitted by

X _____
Signature of Petitioner or Lawyer/WSBA No.
_____, pro se
Print Name

Motion Name & Affidavit in support:
[e-mail address]

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[Party's name] [Ph. #]
[Mailing Address]

*****ALWAYS submit a proposed order! Competent attorneys do. You do it too!*****

(vii) Word Limits. Absent prior authorization from the court, the initial motion and opposing memorandum shall not exceed 4,200 words; and reply memoranda shall not exceed 1,750 words. The word count includes all portions of the motion/memorandum, including headings and footnotes, except 1) the caption; 2) tables of contents and/or authorities, if any; and 3) the signature block. The signature block shall include the certification of the signer as to the number of words, substantially as follows: “I certify that this memorandum contains _____ words, **in compliance with the Local Civil Rules.**”

(viii) Consecutive Page Numbering for Attachments. Attachments or exhibits to any filed document, **in excess of 25 pages**, including motions, oppositions, replies, briefs, declarations, and affidavits, whether in paper or electronic form, shall be numbered consecutively on the bottom center or right-hand corner of each document to aid the court and the parties in navigating through the document. The number shall not restart for each attachment but shall run consecutively through all the attachments to the document. All motions, oppositions, replies, and briefs shall cite to these page numbers. A party may include other citation information, such as exhibit numbers, corresponding exhibit pages or paragraph numbers, in addition to the consecutive page cite.

(C) Form of Proposed Orders; E-mail Addresses. **The moving party and any party opposing the motion shall include with their submissions a proposed order!!!** The original of each proposed order shall be submitted to the hearing judge along with any working copies. If the motion is to be considered without oral argument, the moving party shall at the time of filing the motion provide to the court e-mail addresses for the court’s use in providing courtesy copies of entered orders. Where working copies are provided via the clerk’s eWorking Copies application, the parties shall request courtesy copies of entered order(s) through the clerk’s application.

**[THIS RECOMMENDED SAMPLE MOTION FORM HAS BEEN
BROUGHT TO YOU COURTESY OF AMICUS CURIA, MODELED
AFTER THE LOCAL COURT RULES OF KING COUNTY, WA.]**

Motion Name & Affidavit in support:
[e-mail address]

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[Party’s name] [Ph. #]
[Mailing Address]

Motion Name & Affidavit in support:
[e-mail address]

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[Party's name] [Ph. #]
[Mailing Address]