

FILED
AUG 28 2023
KITSAP COUNTY CLERK
DAVID T. LEWIS III

Superior Court of Washington, County of Kitsap

In re the parenting & support of:
Adeline Marylynn Feulner, (child)

Petitioner/s (*person/s who started this case*):

Heather Lynn Wood (mother)

And Respondent/s (*other party/parties*):

Lenard Ray Feulner (father)

No. 07-3-01713-1

Counter Affidavit & Objections of Heather
Wood

RE: Lenard Feulner's erroneous
Declaration filed 8-11-23

DECLARATION & Objections

I, Heather Wood, am the **Petitioner** in the above cause, a US citizen over the age of 18, and a resident of the State of Washington; the facts that I have provided on this form are true.

A Declaration by Lenard Feulner, dated 8-11-2023, appears in the record for this cause:

(1) **Objection 1:** Lenard Feuler improperly substituted his name as Petitioner for mine, the true Petitioner, and mine (erroneously) as the Respondent. This is not a trivial error as it introduces ambiguity and confusion into the proceedings—already in shambles and a litany of errors and irregularity. E.g. Admitting Adeline, a minor child, into the adversarial proceeding and alienation of affections conflict between the parents. A change of parties regarding their status as Petitioner vs. Respondent requires a court order before a document will be considered by the court as



part of the record. No such permissive court order was ever granted. Thus, any decision based on such erroneous documents in the record fail to establish any basis for granting Lenard Feulner's motion as a fatal procedural flaw at this point. The Declaration by Mr. Feulner entered on 8-11-23 is, thus, defective on its face. It should be disregarded and given no weight for probative value or stricken from the record.

The clerk notes indicate Judge Houser granted an **immediate** restraining order in her entry into the record.

On 8-11-23, Lenard Feulner filed, pro se, a Declaration in support of his Motion for an **IMMEDIATE/Continuing** Restraining Order (Ex Parte), against Heather Wood, the mother w/legal custody of Adeline.

Adeline Feulner, an at risk 16 year old teenager, had been in the exclusive care of Mr. Feulner since 7-20-23, the day Adeline had refused to leave the hospital w/her mother to go home out of pique for having been discovered using drugs (marijuana) and engaging in sexual activities. In said declaration by Mr. Feulner, he states on Page 1, Item #2, the following:

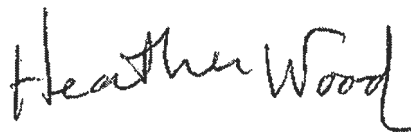
My daughter did not get a lot of her things back from her mother. Here is a list of what she remembers what she had : Passport, Social Security card, inhaler, workpack & contents, clothing, shoes, cowboy hat, rabbit, two guitars, ukulele, memory box, Honda Del Sol, weapons: throwing star, throwing knives, 2 sabertooth knives, stiletto. She was given the car as a Christmas present last year.

The declaration is defective on its face as described above and tampered with the caption as described, making it inadmissible as evidence or a pleading. It lacks sufficient specificity to be understood. The claim to the/any car not only lacks specificity, but violates the statute of frauds inasmuch as no verifiable written documentation supports the claim. Essentially, the claim amounts to conjecture calling for speculation in its

current form. The mother denies the claim and the intent. She has already responded to the remaining claims in a previous counter-affidavit filed w/the court in this cause. All items alleged, or otherwise claimed, came and remain in the mother's possession, et al, lawfully. This action is an improper venue to try Replevin lawsuits, an action at law, while the present action is one in equity. An action at law provides the right to a jury trial not present in this forum. Any vital documents the mother may have will be provided to her child at the child's majority. The Declaration is neither a petition, nor a motion and fails to state a claim or provide sufficient information upon which to provide a response.

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.

DATED this 27th day of August, 2023, in the County of **Thurston**, WA.



(Signature)

Heather Lynn Wood

(Printed Name)

9129 James Rd, SW

(Address)

Rochester, WA 98579

(City & State)

(Zip Code)