

FILED
SUPERIOR COURT
THURSTON COUNTY, WA

2015 APR 10 AM 9:59

Linda Myhre Enlow
Thurston County Clerk

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Superior Court of Washington
County of THURSTON

In re the Marriage of:

ANNETTE MARIE ROTH

Petitioner,

and

STEPHEN KEITH HICKS

Respondent.

No. 14-3-00778-8

AMENDED Petition for Dissolution
of Marriage
(PTDSS)

Para. 1.12: check box if petition
is attached for:

I. Basis

1.1 Identification of Petitioner

Name (first/last) Annette Roth, Birth date 08/18/1975

Last known residence Thurston County, WA.

1.2 Identification of Respondent

Name (first/last) Stephen Hicks, Birth date 06/18/1971

Last known residence Thurston County, WA.

1.3 Children of the Marriage Dependent Upon Either or Both Spouses

The petitioner and respondent are both the legal (biological or adoptive) parents of the following dependent children:

Name Lucas Michael Hicks Age 6



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1.4 Allegation Regarding Marriage

This marriage is irretrievably broken.

1.5 Date and Place of Marriage

The parties were married on 07/11/1998 at Detroit, MI.

1.6 Separation

Petitioner and respondent separated on September 2014.
This is the date (check all that apply):

The parties moved into separate residences.

1.7 Jurisdiction

This court has jurisdiction over the marriage.

This court has jurisdiction over the respondent because:

The respondent is currently residing in Washington.

1.8 Property

There is community or separate property owned by the parties. The court should make a fair and equitable division of all the property.

The petitioner's recommendation for the division of property is set forth below.

The petitioner should be awarded the parties' interest in the following property:

1. 50% of the proceeds from the sale of the family home located at 16530 Village Drive SE, Rainier, WA 98576.
2. 2002 Chevrolet Impala
3. Any and all personal property in her possession except as specifically described herein.
4. Any and all other rights by virtue of her past or future employment, except as specifically described herein.
5. Any and all bank accounts, credit union accounts, savings and loan accounts or other depositories where the account is in her name, except as otherwise specifically described herein.
6. All stock, bonds, mutual funds, certificates of deposit, notes or other negotiable instruments in her name, except as specifically described herein.
7. Any and all life insurance on her life.

1 The respondent should be awarded the parties' interest in the following property:

- 2 1. 50% of the proceeds from the sale of the family home located at 16530 Village
- 3 Drive SE, Rainier, WA 98576.
- 4 2. The home located at 12048 Hobby Street SE, Yelm, WA 98597.
- 5 Any and all personal property in his possession except as specifically described
- 6 herein.
- 7 3. 2003 BMW X5
- 8 4. Any and all other rights by virtue of his past or future employment, except as
- 9 specifically described herein.
- 10 5. Any and all bank accounts, credit union accounts, savings and loan accounts or
- 11 other depositories where the account is in his name, except as otherwise
- 12 specifically described herein.
- 13 6. All stock, bonds, mutual funds, certificates of deposit, notes or other negotiable
- 14 instruments in his name, except as specifically described herein.

15 **1.9 Debts and Liabilities**

16 The parties have debts and liabilities. The court should make a fair and equitable

17 division of all debts and liabilities.

18 The petitioner's recommendation for the division of debts and liabilities is set forth below.

19 The petitioner should be ordered to pay the following debts and liabilities to the

- 20 following creditors:
- 21 1. Any and all debts associated with the 2002 Chevrolet Impala.
 - 22 2. Any and all debts associated with the American Express Credit Card.
 - 23 3. The entirety of any personal debt in her name solely, including but not limited to
 - 24 credit card accounts, lines of credit, promissory notes, or other personal debts,
 - 25 except as specifically described herein.
 1. The entirety of any other debt associated with any property she is awarded,
 - except as specifically described herein.
 2. All debts and liabilities incurred by her after the date of separation, except as
 - specifically described herein.
 3. Any and all debts in her name solely, except as specifically described herein.

The respondent should be ordered to pay the following debts and liabilities to the

- following creditors:
1. Any and all debts associated with the home located at 12048 Hobby Street SE,
 - Yelm, WA 98597.
 2. Any and all debts associated with the 2003 BMW X5.

3. The entirety of any personal debt in his name solely, including but not limited to credit card accounts, lines of credit, promissory notes, or other personal debts, except as specifically described herein.
4. The entirety of any other debt associated with any property he is awarded, except as specifically described herein.
5. All debts and liabilities incurred by him after the date of separation, except as specifically described herein.
6. Any and all debts in his name solely, except as specifically described herein.

Each party should pay their debts incurred since separation.

1.10 Maintenance

Maintenance should not be ordered.

1.11 Continuing Restraining Order

Does not apply.

1.12 Protection Order

There is a temporary protection order between the parties filed in case number 15-2-30089-7, court Thurston County Superior Court, which expires on 04/10/2015.

If you need immediate protection, contact the clerk/court for RCW 26.50 Domestic Violence forms or RCW 10.14 Antiharassment forms.

1.13 Pregnancy

No party is pregnant.

1.14 Jurisdiction Over the Children

This court has jurisdiction over the child for the reasons set forth below.

This state is the home state of the child because the child lived in Washington with a parent or a person acting as a parent for at least six consecutive months immediately preceding the commencement of this proceeding.

The child and the parents or the child and at least one parent or person acting as a parent have significant connection with the state other than mere physical presence; and *substantial evidence is available in this state concerning the child's care, protection, training and personal relationships*; and the child has no home state elsewhere.

No other state has jurisdiction.

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1.15 Child Support and Parenting Plan for Dependent Children

A parenting plan and an order of child support pursuant to the Washington State child support statutes should be entered for the following child who are dependent upon both parties.

Names of Children

Lucas Michael Hicks

The petitioner's proposed parenting plan for the child listed above is attached and is incorporated by reference as part of this Petition.

(The following information is required only for the child who is included in the petitioner's proposed parenting plan.)

During the last five years, the child has lived in no place other than the State of Washington and with no person other than the petitioner or the respondent.

Claims to custody or visitation:

The petitioner does not know of any person other than the respondent who has physical custody of, or claims to have custody or visitation rights to, the child.

Involvement in any other proceeding concerning the child:

The petitioner has been involved in the following proceedings regarding the child (list the court, the case number, and the date of the judgment or order):

Thurston County Superior Court; Cause No. 15-2-30089-7; Temporary Order of Protection.

Other legal proceedings concerning the child:

The petitioner knows of the following legal proceedings that concern the child (list the child concerned, the court, the case number, and the kind of proceeding):

Thurston County Superior Court; Cause No. 15-2-30089-7; Temporary Order of Protection.

1.16 Other

Does not apply.

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II. Relief Requested

The petitioner **requests** the Court to enter a decree of dissolution and to grant the relief below.

Approve the petitioner's proposed parenting plan for the dependent child listed in paragraph 1.15.

Determine support for the dependent child listed in paragraph 1.15 pursuant to the Washington State child support statutes.

Divide the property and liabilities.

Award the tax exemptions for the dependent child listed in paragraph 1.15 as follows:

The mother shall claim the child for EVEN tax years and the father shall claim the child for ODD tax years.

The father shall only have the tax exemption if he is current on child support by December 31st of that tax year. As such, if the father is not current in his child support obligation (including back support owed) by December 31st of the tax year then he may not claim the child and the mother shall claim the child for that year.

Dated: 3-18-15  27963
J. Anne Redford Hall
Signature of Petitioner or Lawyer/WSBA No.

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

Signed at _____, [City] _____ [State] on _____ [Date].

See Attached
Annette Roth
Signature of Petitioner

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II. Relief Requested

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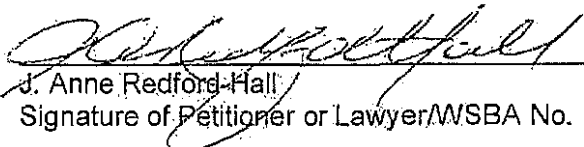
Determine support for the dependent child listed in paragraph 1.15 pursuant to the Washington State child support statutes.

Divide the property and liabilities.

Award the tax exemptions for the dependent child listed in paragraph 1.15 as follows:

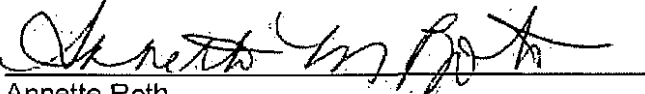
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Dated: 3-18-15  27963
J. Anne Redford-Hall
Signature of Petitioner or Lawyer/WSBA No.

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

Signed at LACEY, [City] WA [State] on 4/5/2015 [Date].


Annette Roth
Signature of Petitioner

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7 SUPERIOR COURT OF WASHINGTON
COUNTY OF THURSTON

8 In re:

9 ANNETTE ROTH,

Petitioner,

NO. 14-3-00778-8

10 And

11 STEPHEN HICKS,

Respondent.

DECLARATION OF ELECTRONIC
TRANSMISSION

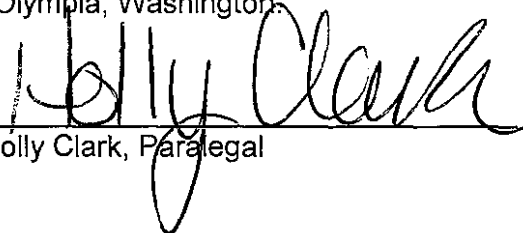
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14 I, Holly Clark, do hereby declare and state as follows:

15 I am a paralegal at the Redford Law Firm and am not a party to this action.

16 I have examined the attached electronic signature page transmitted on April 7, 2015 that
17 consists of eight (8) pages including this declaration and that it is a complete and legible electronic
transmitted original signed by Annette Roth.

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

20 Executed this 7th day of April, 2015 at Olympia, Washington.

21
22 
Holly Clark, Paralegal

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24
25 Declaration of Electronic Transmission – 1

The Redford Law Firm
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Olympia, WA 98502
360-570-0907