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FILED
OCT 17 2024
TRACIA GANTS
LINCOLN COUNTY CLERK

SUPERIOR COURT OF WASHINGTON, COUNTY OF LINCOLN

<p>In re:</p> <p>JUDITH KUENNIGER-GUINN,</p> <p style="padding-left: 40px;">Petitioner,</p> <p>v.</p> <p>WILLIAM KUENNIGER,</p> <p style="padding-left: 40px;">Respondent.</p>	<p>Case No.: 24-3-00791-22</p> <p>DECLARATION OF JUDITH GUINN</p>
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My name is Judith Guinn, I am the Petitioner in this matter, and I am submitting this statement in reply to the response declaration of William Kuenniger.

After review of the financial declaration and response declaration provided by the Respondent, several things stand out to me. The first is that he is not disputing my need for Spousal Support, and he is not opposed to paying it, which is a relief. He is also agreeable to coordinating a mutually agreeable date/time for me to retrieve my belongings from the home. I am working on a list of items I am requesting and will provide that to him once it is complete. He is correct in that I have been staying with my daughter in California since our separation in October 2022. He states his belief is that my daughter works for her father's Casino and makes a lot of money, so my needs are not what I am claiming they are. However, the fact that my daughter is agreeable to allowing me to live with her long-term does not mean it is her obligation to

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1 financially support me. She has thankfully been willing and able to assist me while we are working
2 through this divorce process, but it is creating a financial hardship for her as most of my expenses
3 are medical, and quite substantial every month. I am in dire need of Spousal Support from the
4 Respondent.

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6 Based on my knowledge of our financial situation throughout our marriage, I believe he
7 is underreporting his income. I believe he is also inflating his expenses to make it appear as though
8 he cannot afford the amount of maintenance I am requesting. I am aware that the statute regarding
9 Spousal Support has several factors for the Court to consider when determining whether Support
10 is necessary, and if so, the monthly amount and period of time it will be ordered. The Respondent
11 has not provided the necessary information for these factors to be given the proper consideration
12 needed.

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14 As indicated in my Amended Financial Declaration, and bank statements filed under seal,
15 it is apparent I have extremely limited financial resources. I do not have a regular monthly income,
16 except what I receive from Social Security, which totals \$465.00. The Respondent admits he was
17 historically the one who worked to support the family, as my ability to do so is limited given my
18 medical issues. The ability of the Respondent to pay Spousal Support (and for what amount) has
19 yet to be determined. Although, he was paying all of my monthly expenses previously, so I believe
20 he still has the ability to do that. I received and reviewed his Financial Declaration, but there was
21 no other documentation provided to support his claims that he is unable to pay the amount I am
22 requesting.

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25 He states his net income is \$4,440.40. He also states his housing (which includes utilities,
26 water, sewer, garbage, etc.) is provided by the company he works for. He claims this is taken out
27 of his paycheck, but there have been no paystubs or work contracts provided indicating what
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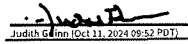
1 deductions are taken out of his paychecks. If the housing is taken out of his paychecks, it should
2 not also be included in his financial declaration as expenses he is left to pay from his net income.
3 There is also \$1,000.00 listed for food and household expenses for 3 people. It is my
4 understanding that the Respondent's daughter and her significant other are living with him,
5 however, they are both financially independent, as they have their own careers and earn income
6 to support themselves. I do not believe costs for additional members of his household should be
7 considered as part of his monthly financial obligations. Throughout our marriage, the Respondent
8 was the one paying for all my medical expenses and other costs of living. Since my leaving in
9 October 2022, he sent me \$1,000.00 in June, and \$600.00 in July. My daughter has provided all
10 other support for me for the last year, and it is becoming more and more difficult each month.
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13 The Respondent states multiple times throughout his declaration that he is agreeable to
14 paying Spousal Support but states he cannot afford the amount I have requested. He makes no
15 indication or offer of a specific amount he is able to pay and has not provided the required
16 documentation for the Court to determine a "reasonable amount" as he is requesting. He also
17 states he is hoping to settle this in mediation however, no mediation dates have been proposed,
18 and in order to have a productive mediation, the missing financial information must be provided.
19

20 At this time, I am maintaining my request for Spousal Support, and request the Respondent
21 pay my attorney fees. I am also requesting he be required to provide his paystubs, work contracts
22 that outline the benefits paid for by the company, along with his bank statements, and all
23 retirement accounts. In order to determine what amount of Spousal Support is needed and what
24 his ability to pay is, I (and the Court) need to have a complete understanding of his entire financial
25 situation. This information will also be necessary in order to proceed with finalizing the divorce,
26 as all of our assets were acquired together, throughout the marriage.
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1 I declare under the penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct.

3 DATED this 7th day of October 2024.

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5 
6 Judith Guinn (Oct 11, 2024 09:52 PDT)

JUDITH GUINN, PETITIONER

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declaration of JUDITH GUINN

Final Audit Report

2024-10-11

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"declaration of JUDITH GUINN" History

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