

EX PARTE DEPARTMENT
Hearing Date: Friday, May 5, 2023
Hearing Time: 3:30 p.m.

**SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THE COUNTY OF KING**

CHARLES A. HAROLD, JR., on behalf of
Vulnerable Adult SHARON M. HAROLD,

Petitioner,

vs.

DAVID ALLEN PAICE,

Respondent.

Case No. 23-2-03980-7 KNT

**DECLARATION OF AMY JANE SMALL
IN SUPPORT OF OBJECTION TO
NOTICE OF PRESENTATION OF
DENIAL ORDER DENYING PETITION
FOR PROTECTIVE ORDER AND
MOTION TO STAY PROCEEDINGS**

I, Amy Jane Small, declare as follows:

1. I am the daughter of Protected Party Sharon M. Harold, a vulnerable adult. I hold a durable power of attorney with disability planning, including attorney-in-fact with power to litigate for her. I am a beneficiary of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 (the "Trust").

2. I am actively involved in this case by monitoring this matter as co-attorney-in-fact. It is my responsibility and duty to assist Petitioner and Protected Party and be aware of the events in this case even though I do not participate in court proceedings.

3. Petitioner contacted me and explained that he and Respondent's counsel could not agree on a version of the Proposed Order and that he had requested a presentation hearing.

1 4. Petitioner notified me that he received an email from Respondent's
2 counsel stating that he wanted to schedule the special hearing during the week of May
3 1. I replied to Petitioner that I was not available that week due to previous business
4 commitments, but I was available the week of May 8.

5 5. I knew Protected Party had scheduled an appointment for May 2, which
6 she had scheduled several months prior. I was planning on accompanying Protected
7 Party to that appointment.

8 6. I work full time, Monday through Friday, including occasional weekends.
9 My job involves traveling between the cities of Elko, Nevada to Reno, Nevada,
10 Mammoth, California and throughout the Lake Tahoe basin.

11 7. On May 2, I was going to travel directly to my mother's doctor's office
12 and meet with Petitioner and leave on May 3 since it takes 8 hours to drive home from
13 Reedsport, Oregon.

14 8. My pre-arranged travel schedule had me making sales call in Elko,
15 Nevada on May 4 and 5. These meetings could not be rescheduled.

16 9. On April 28, 2023, Petitioner told me about the letter from Protected
17 Party's doctor requesting a reprieve from participating in these legal proceedings.

18 10. I am very concerned about my mother's health because I can see the toll
19 this litigation is taking on her. My mother has sufficient funds to last her the entire
20 year. If needed, she also has financial support from her children. Therefore, there is
21 no rush to unfreeze her accounts.

22 11. I am also concerned that Respondent and his attorney seem to be more
23 concerned with a frozen bank account than my mother's health, since they did not sign
24 the Stipulation allowing for the 90 day medical reprieve.

25 12. As the person responsible for my mother's disability and end-of-life
26 planning, I personally have not received any response from Respondent or his
27 attorney regarding the April 27, 2023 letter from my mother's doctor.

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1 13. I respectfully request that this Court stay this action for the 90 days as
2 requested by my mother's doctor for the good of her physical and emotional well
3 being.

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5 DATED: May 2, 2023

s/Amy Jane Small.
Amy Jane Small