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**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

**MOTION TO STRIKE OPPOSITION TO
PETITION FOR PROTECTIVE ORDER ,
DECLARATION OF ALEKSANDER
SCHILBACH, AND DECLARATION OF
DAVID A. PAICE AND REQUEST FOR
JUDICIAL NOTICE**

TO THE COURT, RESPONDENT AND HIS ATTORNEYS OF RECORD:

Petitioner Charles A. Harold, Jr., on behalf of Vulnerable Adult Sharon M. Harold ("Protected Party") hereby moves to strike the Opposition to Petition for Protective Order, the Declaration of Aleksander Schilbach and the Declaration of David A. Paice as untimely and burdensome. Respondent was served with the Protection Order on March 8, 2023, which included the notice of the March 20, 2023 hearing. Respondent had 16 days to respond, but he chose to respond one court day before the hearing. The documents filed today by Respondent's attorney are late, burdensome and do not allow Petitioner nor this Court sufficient time to review and respond before the March 20 hearing date. The decision regarding a Protective Order needs to be resolved as quickly as possible so the Protected Party does not suffer further damage or abuse. The intent of these proceedings is to obtain a prompt

1 resolution using evidence before the Court. For these reasons, Petitioner respectfully
2 requests that this Court strike Respondent's pleadings.

3 Respondent's submission to the Court has just proven Petitioner's case. Since
4 the granting of the Temporary Protective Order on March 6, 2023, two of
5 Respondent's motions made in the TEDRA matter (*In re Sharon M. Harold Irrevocable*
6 *Trust dated November 12, 2004*, Case No. 22-4-08326-1 KNT) were denied. One of
7 them was a Denial to Appoint a Legal Guardian Ad Litem. These motions were an
8 attempt to distract the TEDRA Court away from the actual matter of the Court,
9 Respondent's approval of his accounting of trust.

10 The denied motions were frivolous when filed and as a matter of law had little
11 chance in succeeding. Respondent and his attorneys knew this but filed them anyway,
12 charged Protected Party's trust for the attorney fees, then charged Protected Party's
13 trust again to reply to the opposition to the frivolous motion. As stated previously to the
14 Court, the law firm of Lane Powell has created a perpetual motion billing machine that
15 creates automatic charges to Protected Party's trust. Petitioner will let the Court
16 estimate how much all this has cost Protected Party, but we believe it is over \$100,000
17 so far. Those funds could have been used to put Protected Party in assisted living.

18 Petitioner considers the filing of Respondent's motion after motion a misuse of
19 trust funds, litigious, and therefore the very definition of Financial Elder Abuse.
20 Petitioner is attempting to stop the financial bleeding of Protected Party's trust while
21 Respondent keeps churning attorney fees in a feeble attempt to get his accounting of
22 trust approved, which is futile since it cannot be approved as a matter of law per
23 California Probate Code.

24 Petitioner would like to bring this Court's attention to the reasoning behind
25 Commissioner Judson's approving the withdrawal of Michelle Blackwell, Protected
26 Party's previous counsel. During the February 3 hearing in the TEDRA matter,
27 Commissioner Judson stated, "[I]t is clear to me that this is not a relationship that the
28 counsel wishes to continue. She is authorized to withdraw." At this point, the

1 relationship between Protected Party and Ms. Blackwell had become adversarial and
2 Commissioner Judson used fair reasoning to release Ms. Blackwell. Petitioner notes
3 that the relationship between Respondent and Protected Party has also become
4 adversarial, to the point that Respondent spends Protected Party's trust money as if it
5 were his own. It is not. For this same reasoning, this Court should immediately
6 remove Respondent as acting trustee.

7 DATED: March 17, 2023

s/Charles A. Harold, Jr.

8 Charles A. Harold, Jr., Residual Beneficiary and
9 Respondent in pro se
10 1455 N. Tomahawk Rd.
11 Apache Junction, AZ 85119
12 Tel: 818-652-6400
13 E-mail: chuckharold@gmail.com

14 DATED: March 17, 2023

s/Sharon M. Harold

15 Sharon M. Harold, Grantor and
16 Respondent in pro se
17 100 River Bend Rd. #103
18 Reedsport, OR 97467
19 Tel: (541) 662-1937
20 Email: smharold7@gmail.com