

EXHIBIT D: SYSTEMATIC LITIGATION PATTERN EVIDENCE

Case: Goodnight v. Ralidak

Case Number: 20-3-03830-3-SEA

Source: King County Superior Court Records Portal

Evidence Type: Official Court Documentation

SYSTEMATIC PATTERN OVERVIEW

Total Motions Filed by Respondent: 40+ documented motions over 5 years

Success Rate: Less than 5%

Court Sanctions Imposed: \$14,500+ (ignored by Respondent)

Financial Impact on Family: \$50,000+ in defensive legal fees

2025 ESCALATION PATTERN

Evidence of Systematic Abuse Intensification:

Date	Document #	Motion Type	Status	Pattern Evidence
05/05/2025#374		Counter Modification Petition	Filed by Matt	Response to Veronika's modification
06/05/2025#380		Temporary Orders Motion	Filed by Matt	First escalation motion
06/24/2025#409		Temporary Orders Motion	Filed by Matt	Second escalation motion

Date	Document #	Motion Type	Status	Pattern Evidence
07/11/2025	#425	Adequate Cause Motion	Filed by Matt	Third escalation motion
07/11/2025	#427	Temporary Orders Motion	Filed by Matt	SAME DAY fourth motion
08/15/2025	#440	Contempt Motion	Filed by Matt	TikTok evidence, DVPO violations
08/15/2025	#443	COURT DENIAL	DENIED SAME DAY	Motion found without merit

Pattern Analysis: 6 motions in 4 months, with latest contempt motion filed and denied same day - indicating court found allegations frivolous or procedurally defective.

FORCED PRO SE STATUS

Attorney Withdrawal: Document #438 (07/21/2025) - Notice of Intent to Withdraw filed due to financial exhaustion from defending systematic litigation pattern.

Financial Warfare Success: After \$50,000+ in defensive attorney fees over 5 years, systematic litigation abuse has achieved its goal - forcing mother to defend constitutional parental rights without legal representation while father maintains counsel.

Constitutional Impact: Systematic litigation pattern violates access to justice and due process by financially coercing abandonment of right to counsel.

CONSTITUTIONAL VIOLATION EVIDENCE

Court Guidance: Children “should not be away from their mother for more than one week” (Judge Rampersad)

Current Separation: 143 days (April 25 - August 25, 2025)

Mathematical Violation: $143 \div 7 = 20.4x$ excess of court-established guidance

During Systematic Abuse: Separation continues while Respondent files 6 additional motions in 4 months

HISTORICAL SANCTIONS PATTERN

Previous Court Actions: - **2020:** \$8,500 sanctions imposed against Respondent for frivolous litigation - **2021:** Additional sanctions for continued pattern - **2025:** Motion to Restrict Abusive Litigation filed and heard

Respondent's Response: Ignores sanctions, continues systematic filing pattern

COURT FRUSTRATION EVIDENCE

Document #443 (08/15/2025): "Order Denying Motion/Petition" - **Same Day Rejection**

Significance: Court rejected Respondent's motion on the same day it was filed, indicating: - Judicial frustration with repetitive filings - Recognition of frivolous nature - Systematic pattern awareness

FINANCIAL WARFARE DOCUMENTATION

Defensive Costs Imposed on Mother: - 2020-2021: \$21,000-32,000 defending frivolous motions - 2022-2024: \$17,000-26,000 continued defensive costs

- 2025: \$12,000-15,000 current defense costs - **Total:** Over \$50,000 in forced defensive litigation

Court Sanctions Ignored: \$14,500+ awarded against Respondent, unpaid

SYSTEMATIC ABUSE CONCLUSION

This exhibit demonstrates a documented 5-year pattern of systematic litigation abuse designed to:

1. **Financially exhaust** the mother through repetitive defensive costs
2. **Weaponize court process** to maintain child separation beyond judicial guidance
3. **Ignore court sanctions** while continuing the same pattern
4. **Escalate frequency** when previous tactics fail (6 motions in 4 months)
5. **Abuse emergency procedures** without genuine emergencies

Court Recognition: Same-day motion denial demonstrates judicial awareness of frivolous litigation pattern requiring immediate intervention.

Source Verification: All document numbers referenced above are publicly verifiable through King County Superior Court Records Portal (dja-prd-ecexap1.kingcounty.gov) for Case #20-3-03830-3-SEA.

Constitutional Impact: This systematic pattern violates due process rights and creates constitutional harm through prolonged separation 20.4x beyond established judicial guidance during continued litigation abuse.