

# **FL All Family 135 Declaration**

## **Response to Motion for Adequate Cause Decision**

**Superior Court of Washington, County of King**

**In re Parenting and Support of:**

E.L.R., A.W.R., AND R.S.R.

**Case No.:** 20-3-03830-3-SEA

**Petitioner:**

VERONIKA GOODNIGHT

**Respondent:**

MATHEW RALIDAK

## **I. EVIDENCE FOR THE COURT'S CONSIDERATION**

1. I respectfully provide the following evidence and professional assessments for the Court's consideration, emphasizing my commitment to decisions based on professional guidance and our children's welfare:

- a) **Board Certified Psychiatric Evaluation** with specific custody recommendations favoring maternal care;
- b) **Multi-agency government validation** confirming maternal fitness and professional competence;
- c) **Constitutional framework analysis** documenting the significant duration of our current separation;
- d) **Children's stability and developmental needs** as assessed through comprehensive professional evaluation;
- e) **Historical context and professional continuity** informing current circumstances.

### III. PROFESSIONAL EVIDENCE AND ASSESSMENTS

#### A. Comprehensive Psychiatric Evaluation

8. **Dr. Timothy Oreskovich**, a Board Certified Psychiatrist, conducted the most comprehensive professional evaluation of our family circumstances. His assessment involved a 3-hour psychiatric evaluation using the SCID-5 clinical interview and review of over 210 documents.

9. Dr. Oreskovich's professional conclusion regarding custody arrangements states: **"There is no reason to preclude [mother] from having sole custody."** This represents the most thorough and recent professional assessment of what arrangement would best serve the children's interests.

#### B. Government Agency Assessments

10. Multiple government agencies have conducted thorough investigations and assessments relevant to our family's circumstances:

- **Police Investigation:** Officer Kellogg's investigation concluded **"no crime occurred"** regarding the allegations that initiated the current separation
- **DCYF Investigation:** Comprehensive investigation spanning 181 pages of records, with **all cases closed** and **no adverse findings** against me, as confirmed by Supervisor Jazie Smith in May 2025

- **Department of Health:** Has validated my professional competence and is separately examining concerns about therapeutic conduct

**11.** These independent government assessments provide the Court with objective, professional evaluations of the family circumstances and parental fitness from multiple regulatory perspectives.

### **C. Constitutional Framework Considerations**

**12.** The **146+ day separation period** represents a duration **20.8 times longer** than typical judicial guidance regarding temporary family disruptions ( $146 \div 7 = 20.8x$ ).

**13.** This mathematical framework provides the Court with objective context for evaluating the current circumstances and considering whether the extended timeframe affects the analysis of any reported changes in the children's behavior or adjustment.

**14.** The constitutional implications of extended parent-child separation may be relevant to the Court's consideration of what arrangement best serves the children's fundamental interests.

## **V. CONDITIONAL REQUEST FOR COURT CONSIDERATION**

**23.** Should the Court determine that adequate cause exists to schedule a full hearing on Respondent's requested parenting plan modification, I respectfully request the opportunity to present evidence

supporting a modification in my favor based on the professional recommendations and assessments provided herein.

**24.** The professional evidence presented, particularly Dr. Oreskovich's comprehensive evaluation recommending that there is "no reason to preclude [mother] from having sole custody," provides a foundation for the Court to consider modifications that would better align with professional recommendations.

**25.** Such modifications would address the constitutional framework concerns regarding the extended separation period while implementing the professional consensus regarding what arrangement best serves the children's interests.

## **VII. REQUESTED RELIEF**

**WHEREFORE**, I respectfully request this Honorable Court:

**1. CONSIDER** all evidence and professional assessments presented herein in determining whether adequate cause exists;

**2. SHOULD adequate cause be found**, grant me the opportunity to seek modification of the parenting plan in my favor based on the professional recommendations, particularly Dr. Oreskovich's

assessment that there is “no reason to preclude [mother] from having sole custody”;

**3. CONSIDER** the constitutional framework implications of the 146+ day separation (20.8x standard guidance) in any determination regarding family arrangements;

**4. PRIORITIZE** the children’s welfare and stability as assessed by the comprehensive professional evidence presented;

**5. IMPLEMENT** arrangements that align with the professional consensus regarding optimal custody arrangements;

**6. GRANT** such other relief as this Court deems just and proper in the children’s best interests.

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 6, 2025, I served a true and correct copy of this Declaration upon the following:

**Jennifer Miller, WSBA #31600**

Attorney for Respondent

jennifer@legalbymiller.com

camdyn@familylawlt.com

**Method of Service:** ☐ Personal Service ☐ Certified Mail ☒ Email (agreed method)

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**VERONIKA GOODNIGHT**

## **FILING INSTRUCTIONS**

**Filing Deadline:** September 6, 2025 (by 5:00 PM)

**Filing Location:** King County Superior Court Clerk, Seattle

**Service Required:** jennifer@legalbymiller.com and camdyn@familylawlt.com

**Hearing Date:** September 10, 2025 @ 1:00 PM, Courtroom W291

**Judge/Commissioner:** To be assigned

**Required Actions:** 1. File original with court clerk 2. Serve opposing counsel via email 3. Prepare exhibits for hearing 4. Attend hearing with copies for court