

EXHIBIT C: Constitutional Framework Analysis

Extended Separation Duration Assessment

Case: Goodnight v. Ralidak (20-3-03830-3-SEA)

Hearing: September 10, 2025 - Adequate Cause Motion

Analysis Date: September 4, 2025

CONSTITUTIONAL VIOLATION ANALYSIS

Current Separation Duration

- **Start Date:** April 2025
- **Current Duration:** 146+ days
- **Mathematical Analysis:** $146 \div 7 = 20.8x$ standard guidance
- **Percentage Violation:** 2,080% excess of judicial guidance

Judicial Guidance Framework

Judge Rampersad's Standard: "One week maximum" for temporary family disruptions

Legal Precedent: Courts consistently favor minimal separation duration

Constitutional Basis: Due process protection of fundamental parental rights

Due Process Analysis

Fourteenth Amendment Considerations: - **Fundamental Right:** Parent-child relationship is constitutionally protected - **Procedural Due Process:** Extended separation without compelling justification - **Substantive Due Process:** Duration exceeds reasonable temporary measures

Washington State Constitution: - **Article I, Section 3:** Due process protection - **Article I, Section 7:** Unreasonable seizure of fundamental rights - **Family Integrity:** State constitution recognizes family unit protection

Mathematical Framework

Judicial Guidance Violation:

Standard Guidance: 7 days maximum

Current Duration: 146+ days

Mathematical Ratio: $146 \div 7 = 20.8x$

Percentage Excess: 2,080%

Comparative Analysis: - **1 week** = Judicial guidance compliance - **2 weeks** = 200% of guidance (potentially acceptable emergency) - **4 weeks** = 400% of guidance (concerning duration) - **12 weeks** = 1,200% of guidance (constitutional concern) - **20+ weeks** = 2,000%+ of guidance (clear violation)

Legal Precedent Analysis

Washington State Family Law: - **RCW 26.09:** Temporary family law orders require “substantial need” - **Case Law:** Extended separation requires compelling justification - **Court Practice:** Favor expeditious resolution of family disruption

Federal Constitutional Law: - **Stanley v. Illinois:** Fundamental right to family integrity - **Santosky v. Kramer:** Clear and convincing evidence standard for family disruption - **Troxel v. Granville:** Constitutional protection of parental rights

Child Welfare Framework

Best Interests Standard: - **Stability Requirement:** Children benefit from consistent arrangements - **Separation Trauma:** Extended parent-child separation causes developmental concern - **Professional Assessment:** Dr. Oreskovich evaluation supports current arrangement restoration

Washington State Guidelines: - **RCW 26.09.260:** Modification requires “substantial change in circumstances” - **Professional Standard:** Evidence-based decision making prioritized - **Child Development:** Minimize disruption to established relationships

RELIEF SOUGHT ANALYSIS

Adequate Cause Denial: - Extended separation demonstrates **artificial circumstances**, not legitimate change - **Constitutional violations** require remedy, not formalization - **Professional evidence**

contradicts modification justification

Alternative Relief: - **Immediate restoration** of established arrangements - **Constitutional compliance** through expeditious resolution - **Professional recommendation implementation**
(Dr. Oreskovich evaluation)

CONCLUSION

The **146+ day separation** constitutes a **mathematical violation** of established judicial guidance by **2,080 %**. This excessive duration raises **serious constitutional concerns** regarding due process protection of fundamental parental rights.

Rather than granting adequate cause to potentially **formalize and extend** these constitutional violations, the Court should **deny adequate cause** and **order immediate steps** to restore constitutional compliance through evidence-based arrangements supported by professional recommendations.

Constitutional analysis supports: Denial of adequate cause motion and implementation of professional recommendations to restore family integrity within constitutional framework.