Veronika Elicia Goodnight

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Superior court of washington

County of king

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| Veronika elicia goodnight,  Plaintiff,  vs.  ALEXANDER BOSSINAS JR  Defendant | Case No.  **CLAIM TRIAL BY JURY** |

I, Veronica Elicia Goodnight, Plaintiff, am over the age of 18 and have personal knowledge to the facts stated within and if called upon to testify, I could and would completely and truthfully testify to the facts stated below.

**BRIEF AND SUPPORT**

1. County of King Court Case Number 25-2-11308-6 SEA is a substantive and procedural nullity. Defendant has placed no facts on record under the rules of evidence with firsthand knowledge. ( *Washington State, [Evidence Rule 602](https://www.google.com/search?cs=0&sca_esv=76514260854d2b95&q=Evidence+Rule+602+(ER+602)&sa=X&ved=2ahUKEwi9zqezic2OAxUoJ0QIHZp9Ig4QxccNegQIAhAB&mstk=AUtExfDcjVYnqOcA6Eg2RoJePV6vxe4cJ3LmFJm0Mef78BSJuisq6gXr7D84qtK0HrtF_ThX6_kHCNxHfQWW_6-wOacHLxjuCALkBMNFqrLZz6p6Q-fp81E3iehbTL83Qs6gIvY&csui=3" \t "https://www.google.com/_blank); A witness may not testify to a matter unless evidence is introduced sufficient to support a finding that the witness has personal knowledge of the matter. Evidence to prove personal knowledge may, but need not, consist of the witness' own testimony.*) No facts appear on the record, whether by depositions, answers to interrogatories, or by affidavit, to suggest or to support the defendant's allegations. Documents proffered by the defendant are unverified, out of date, and inadmissible.

**ARGUMENT AND AUTHORITY**

1. Statements of counsel and their briefs and arguments are not sufficient for the purpose of granting a motion for judgment. (*Trinsey v. Pagliari, D.C.Pa.1964,229F.Supp.647*) Unsupported contentions of material fact are not sufficient on motion for judgment, but rather material facts must be supported by affidavits and other documents that would be admissible in evidence at trial. Where there are no depositions, admissions, answers to interrogatories, or affidavits, the defendant's motion for judgment could not be heard.
2. Defendant cannot take plaintiff's rights away from her minor children without due process of law. This right is secured to the plaintiff by the State of Washington Constitution Declaration of Rights,and the U.S. Constitution. *( State of Washington Declaration of Rights Section 3; PERSONAL RIGHTS. No person shall be deprived of life, liberty, or property, without due process of law.) (Amendment XIV, Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.)*
3. Defendant cannot take plaintiff's rights away from her minor children unless first a jury has rendered a verdict that the plaintiff has caused intentional harm, injury, or abandoment to her minor child. (*State of Washington Declaration of Rights Section 21; The right of trial by jury shall remain inviolate, but the legislature may provide for a jury of any number less than twelve in courts not of record, and for a verdict by nine or more jurors in civil cases in any court of record, and for waiving of the jury in civil cases where the consent of the parties interested is given thereto.) ( United States Bill of Rights Section 7; In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined in any Court of the United States, than according to the rules of the common law.)*
4. Plaintiff believes and thereupon alleges that defendant acted willfully, knowingly, maliciously, and with reckless disregard and deliberate indifference to the know consequences of their acts and omissions, and purposefully with the intent to deprive the plaintiff of her protected rights, privileges, and immunities secured to her by the laws of the State of Washington, the Washington and U.S. Constitution, and did in fact violate those rights, privileges, and immunities.
5. As a direct and proximate result of the aforesaid acts, plaintiff has suffered great mental and physical pain, suffering, anguish, fright, nervousness, anxiety, grief, shock, humiliation, indignity, embarrassment, apprehension, all to her damage in a sum to be determined at trial.
6. WHEREFORE, the plaintiff wishes for case Number 25-2-11308-6 SEA as follows;
7. Judgment void.
8. Full physical custody of her children restored.
9. In favor of plaintiffs for general damages in a sum according to proof according to proof at trial.
10. For punitive damages against the individual defentant in an amount to be determined.
11. For such other and further relief as the Court deems just and proper.

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