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Superior Court of Washington, County of King

In re:

Petitioner,

VERONIKA GOODNIGHT

And Respondent,

MATHEW RALIDAK

No. 20-3-03830-3 SEA

OBJECTION and REQUEST TO
STRIKE UNTIMELY REPLY
DECLARATION OF MATHEW
RALIDAK

OBJECTION AND MOTION TO STRIKE UNTIMELY REPLY DECLARATION

Petitioner, Veronika Goodnight, by and through undersigned counsel,
Elizabeth Stowe, of Enright Law APC, respectfully objects to and moves this Court to strike in its
entirety the Reply Declaration of Mathew Ralidak, two additional Sealed health Care Documents
and the Working Submission List, filed June 18, 2025, as untimely under King County Local
Family Law Rule (LFLR) 6(d).

I. RELEVANT PROCEDURAL RULES

1. Per LFLR 6(d)(3):
“Replies must be filed no later than noon 3 judicial days prior to the hearing.”
2. Per LFLR 6(d)(5):
“The moving party must file a Working Papers Submission List by noon 3 judicial days
before the hearing date.”
3. Court Holidays:
June 19, 2025 (Juneteenth) is a court holiday under RCW 1.16.050 and must be excluded
from the count of court days under CR 6(a).

II. APPLICATION OF RULES TO FACTS

1 The hearing is scheduled for Monday, June 23, 2025. Per court rules, to meet the deadline,
2 the Reply and supportive pleadings had to be filed by noon on Tuesday, June 17th, 2025, due to
3 the court holiday.

4 However, the Reply Declaration of Mathew Ralidak was e-filed on Wednesday, June 18th,
5 after noon, which would not have been timely even **without** the court holiday, which is improper.
6 More critically, the reply relies on newly filed and voluminous exhibits, which prejudice Petitioner
7 without adequate opportunity to respond in time for the hearing.

8 Furthermore, this Reply was filed by a Limited License Legal Technician (LLLT), an
9 officer of the court, Camdyn Joiner, of Mulkilteo Divorce and Family Law, who is presumed to
10 know and comply with applicable court rules and deadlines. Failure to adhere to these
11 fundamental timing requirements, especially by a professional, should not be excused as a valid
12 reason for an untimely filing.

13 III. REQUEST FOR RELIEF

14 For the reasons stated above, Petitioner respectfully requests that this Court:

- 15 a. Strike the Reply Declaration of Mathew Ralidak and the supportive pleadings in their
16 entirety as untimely filed in violation of CR 6(a) and LFLR 6(d);
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18 b. Exclude all attachments submitted therewith from consideration.
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20 c. Alternatively, continue the hearing to allow Petitioner a meaningful opportunity to
21 review and respond to the untimely Reply, should the Court decide not to strike it
22 entirely.
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DATED this 20th day of June, 2025, at Bellevue, Washington.

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ENRIGHT LAW APC

Elizabeth Stowe

Elizabeth Stowe, WSBA #60591
Attorney for Veronika Goodnight