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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

ATTORNEY FEE DECLARATION

I, Elizabeth Stowe, make this declaration based upon my own personal knowledge.

1. I am the attorney of record for the Petitioner, VERONIKA GOODNIGHT, in the above-captioned matter. I make this declaration, compliant with Lodestar criteria pursuant to RCW 26.09.140, in support of Petitioner's request for attorney fees. I respectfully request an award of attorney's fees on behalf of the Respondent based on Petitioner's intransigence as well as based on need and ability.

2. I have been an attorney in the State of Washington and licensed to practice since 2023. I am also licensed to practice in the State of Oregon and have been so since 202. I work for the law firm Enright Law APC located in Bellevue, Washington. My hourly rate is \$395.00. Our firm paralegal rate is \$255.00. The fees set forth for the work performed are equal to or less than the hourly rate for attorneys and paralegals in this area with our background, education and experience.

3. I will have spent approximately 2 hours preparing Petitioner's Responsive Declaration in review of Respondent's Motion for Temporary Family Law Order, DVRO request, and filing.

4. In addition, I will spend an additional 2 hours for the following: Attendance at hearing for Respondent's Motion and an additional 2 hours reviewing, ensuring proper orders for entry, and processing final court orders.

5. Zoe Pianko is a Legal Assistant at Enright Law APC. She performed work for the Petitioner at the rate of \$195 per hour. This rate is commensurate with her abilities and rates charged by legal assistants in the area. Zoe Pianko spent approximately 11 hours reviewing and organizing documents, processing documents into attorney computer system, organizing attorney file, confirming hearing confirmed, calendaring hearing and processing initial documents from opposing party, reviewing and replying to attorney and client emails regarding hearing and sending client pleadings and correspondence.

6. Angela Johns is a paralegal at Enright Law APC. She performed work for the Petitioner at the rate of \$255 per hour. This rate is commensurate with her abilities and rates charged by family law paralegals in the area. Angela Johns spent approximately 5 hours reviewing documents, proofing, drafting, editing and filing of pleadings and preparing materials for the hearing, reviewing and replying to attorney and client emails regarding hearing and sending client pleadings and correspondence.

7. **Attorney time:**

a. 6 hours @ \$395 = \$2,370.00

8. **Legal Assistant Time:**

a. 11 hours @ \$195 = \$2,340.00

9. **Paralegal time**

a. 5 hours at \$225 = \$1,125.00

Total \$5,835.00

10. Based on the above, I anticipate my total fees and costs to be billed to Petitioner for the required work above will be a minimum of \$5,835.00 in attorney's fees and costs.

11. Due to the Respondent's continued intransigence in not following court orders, the abusive use of litigation via multiple court filings, Petitioner's attorney fees have substantially increased.

I certify under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct and representative of reasonable attorney's fees billed in having to file Respondent's Motion for Temporary Orders, respond to Petitioner, and defend against Petitioner's Petition for Protection Order and ensure the children's best interest in protected.

DATED this 13th day of June, 2025, at Bellevue, Washington.

ENRIGHT LAW APC

Elizabeth Stowe
Elizabeth Stowe, WSBA #60591
Attorney for Veronika Goodnight