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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 2012. 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.

1 3. I have spent numerous hours defending Petitioner in this matter due to
2 Respondent's continued abuse of the court system.

3 4. Since 2020, Respondent has filed dozens of motions against Petitioner, using
4 litigation tactics to harass Petitioner. On April 25th, Respondent filed a Domestic Violence
5 Restraining Order against Petitioner and her fiancé. The temporary order is in place until July
6 11th. The final order was denied. I have spent approximately 3 hours in defending Petitioner in
7 that matter. The DVPO is a part of Respondent's abusive litigation strategy, and it continues.

8 5. On May 5th, 2025, Respondent filed a Motion for Adequate Cause requesting the
9 same relief as he does in this motion. Respondent never showed up for the hearing on the
10 motion. The court and I waited for nearly an hour for his appearance, but he never appeared
11 nor communicated by any means with the me or the court. The court therefore struck his
12 motion. I spent 3 hours preparing Petitioner's Responsive Declaration and pleadings. I spent
13 another 2 hours preparing for and attending the hearing all for Respondent failing to appear on
14 his own motion.

15 6. Now, this is the third time Respondent has filed a Motion for Temporary Orders
16 requesting the same relief in this matter. The first attempt in 2020 was denied. Respondent
17 attempted another Motion for Temporary Family Law Orders on June 8th requesting the same
18 relief he is requesting today. However, Respondent was late in filing his reply on the previous
19 motion and therefore struck his motion on the day of the hearing. I spent 3 hours preparing
20 Petitioner's Responsive Declaration and 2 hours preparing for the hearing. Respondent's
21 conduct has wasted judicial resources and cost Petitioner thousands of dollars in attorney fees.

22 7. On this motion, I will have spent approximately 3 hours preparing Petitioner's
23 Responsive Declaration in review of Respondent's Motion for Temporary Family Law Order.
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1 8. In addition, I will spend an additional 2 hours for the following: Attendance at
2 hearing for Respondent's Motion and an additional 2 hours reviewing, ensuring proper orders
3 for entry, and processing final court orders.

4 9. In total, I have spent approximately 20 hours combined preparing responses to
5 Respondent's numerous motions and orders, conferring with staff, corresponding with
6 Petitioner, and conducting legal research.

7 10. Zoe Pianko is a Legal Assistant at Enright Law APC. She performed work for the
8 Petitioner at the rate of \$195 per hour. This rate is commensurate with her abilities and rates
9 charged by legal assistants in the area. Zoe Pianko spent approximately 14 hours reviewing
10 and organizing documents, processing documents into attorney computer system, organizing
11 attorney file, confirming the hearing, calendaring hearing and processing initial documents from
12 opposing party, reviewing and replying to attorney and client emails regarding hearing and
13 sending client pleadings and correspondence.

14 11. Angela Johns is a paralegal at Enright Law APC. She performed work for the
15 Petitioner at the rate of \$255 per hour. This rate is commensurate with her abilities and rates
16 charged by family law paralegals in the area. Angela Johns spent approximately 10 hours
17 reviewing documents, proofing, drafting, editing and filing of pleadings and preparing materials
18 for the hearing, reviewing and replying to attorney and client emails regarding hearing and
19 sending client pleadings and correspondence.

20 12. **Attorney time:**
21 a. 20 hours @ \$395 = \$7,900

22 13. **Legal Assistant Time:**
23 a. 14 hours @ \$195 = \$2,730

24 14. **Paralegal time**
 a. 10 hours at \$225 = \$2,250

Total \$12,880

15. 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 \$12,880 in attorney's fees and costs.

16. 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 Petitioner's Response in Respondent's Motion for Temporary Orders and defend against Respondent's Petition for Protection Order and ensure the children's best interest in protected.

DATED this 2 day of July, 2025, at Bellevue, Washington.

ENRIGHT LAW APC

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