

FILED  
FRANKLIN CO CLERK

2007 APR -5 P 4: 26

MICHAEL J. KILLIAN

*ms* DEPUTY

SUPERIOR COURT OF WASHINGTON

COUNTY OF ~~FRANKLIN~~ *Franklin*

In re the Marriage of:

JANELL GORDON

Petitioner,

NO. 05-3-50185-1

and

JERRY GORDON

MOTION FOR ATTORNEYS FEES FOR  
BAD FAITH/ABUSE OF  
PROCESS/DECEPTION/HINDERING  
THE PROCESS OF ADMINISTRATION

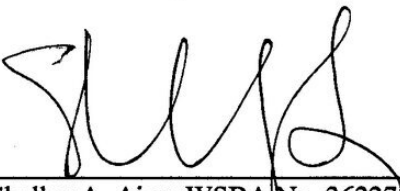
Respondent.

I. MOTION & BASIS

Jerry Gordon moves the court for an order directing Janell Gordon to appear personally before the court and show cause why an order for attorneys fees should not be entered:

This motion is based upon the prior Motion and Declaration for Contempt that was filed herein, the court file, and Title 26 and other applicable case law and statutes.

Dated: 4-4-07

  
Shelley A. Ajax, WSBA No. 36227  
Attorney for Respondent

ORIGINAL

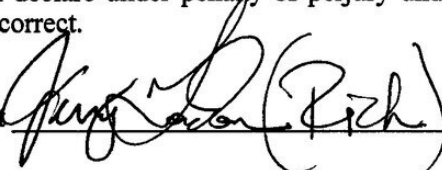
II. DECLARATION

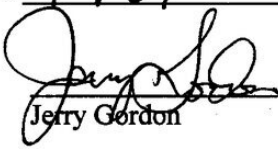
Janell Gordon should be ordered to pay my attorneys fees due to her deception and bad faith in connection with my earlier filed motion for contempt.

As previously stated, we were scheduled to mediate our disputes. We have since rescheduled that matter, but Janell's lies have cost me some attorneys fees that I normally would not have had to incur. She apparently knew on March 17, 2007 that her grandmother died. (See attached.) The funeral was on Friday, March 23, 2007. ASSUMING THIS WAS TRUE, there was still plenty of time for her to get back here for the mediation date we set and she failed not to show. She lied to me by stating that she was in Vegas. I did not know until the day before the mediation that she was not coming back. I would not have filed my previous motion had I know her grandmother died. Instead she deceived all of us. I feel bad for the mediator who lost her slot and I should not have to pay for that.

THE TRUTH OF THE MATTER: Janell has committed fraud on this court. The plane tickets do not match up with the funeral. I spoke with <sup>a friend of</sup> her brother. They went to Vegas. <sup>Apparently,</sup> He said 5 days was too long of a period of time to be in Vegas, but they had fun. This court should order her to immediately release all credit card statements, bank statements and financials, as they arrive for this time period including a letter from Delta indicating that she did not travel to Vegas during this time period and provide a full package of boarding passes and travel itinerary. Using Delta requires, generally, one to stop in Salt Lake while traveling to and from Vegas. Janell has committed fraud on this court.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at  [City and State] on 4-4-07 [Date].

  
Jerry Gordon

ORIGINAL



BOARDING PASS  
ELECTRONIC TICKET  
2 006 2194229191 2  
DH9A15

DL2517912537

B3N8V/GRSYS

FLIGHT DATE CLASS ORIGIN DEPARTS  
DL570 22MAR B SALT LAKE CITY 831A  
OPERATED BY COACH DESTINATION  
DELTA AIR LINES INC WAS-DULLES

DEPARTURE GATE 010 \*\*SUBJECT TO CHANGE\*\*

SEAT  
**40F**  
ZONE 4

BOARDING PASS  
\*\*\*\*\* ET \*\*\*\*\*  
GORDON/JANELL

DL2517912537

FLIGHT DATE  
DL570 22MAR

ORIGIN  
SALT LAKE CITY

DESTINATION  
WAS-DULLES

OPERATED BY DELTA AIR LINES INC

SEAT  
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ZONE 4



PSC033F30/JC



BOARDING PASS  
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FLIGHT DATE CLASS ORIGIN DEPARTS  
DL3768 28MAR Q SALT LAKE CITY 120SP  
OPERATED BY COACH DESTINATION  
SKYWEST AIRLINES PASCO WASH

DEPARTURE GATE E73 \*\*SUBJECT TO CHANGE\*\*

SEAT  
**3D**  
ZONE 3



BAGS  
01  
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BOARDING PASS  
\*\*\*\*\* ET \*\*\*\*\*  
GORDON/JANELL

DL2517912537

FLIGHT DATE  
DL3768 28MAR

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SALT LAKE CITY

DESTINATION  
PASCO WASH

OPERATED BY SKYWEST AIRLINES  
A DELTA CONNECTION CARRIER

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BOARDING PASS  
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FLIGHT DATE CLASS ORIGIN DEPARTS  
DL501 28MAR Q WAS-DULLES 730A  
OPERATED BY COACH DESTINATION  
DELTA AIR LINES INC SALT LAKE CITY

DEPARTURE GATE B46 \*\*SUBJECT TO CHANGE\*\*

SEAT  
**18F**  
EXIT  
ZONE 6



BAGS  
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IAD02F336/KI

BOARDING PASS  
\*\*\*\*\* ET \*\*\*\*\*  
GORDON/JANELL

DL2517912537

FLIGHT DATE  
DL501 28MAR

ORIGIN  
WAS-DULLES

DESTINATION  
SALT LAKE CITY

OPERATED BY DELTA AIR LINES INC

SEAT  
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EXIT  
ZONE 6

BAGS  
01

ORIGINAL

MAR 28 2007 ✓

### *23rd Psalm*

*The Lord is my shepherd; I shall not want,  
He maketh me to lie down in green pastures;  
He leadeth me beside the still waters.  
He restoreth my soul: He leadeth me  
in the paths of righteousness  
for his name's sake.*

*Yea, though I walk through the valley  
of the shadow of death, I will fear no evil:  
for thou art with me; thy rod and thy staff  
they comfort me. Thou preparest a table  
before me in the presence of mine enemies:  
Thou anointest my head with oil,  
my cup runneth over.*

*Surely goodness and mercy shall follow me  
all the days of my life: and I shall dwell  
in the house of the Lord forever.*

### *In Loving Memory of*

*Grace McKenzie Peters*

**Date of Birth**  
June 18, 1910

**Date of Death**  
March 17, 2007

**Graveside Service**  
Friday, March 23, 2007 at 1:00 p.m.  
Hillcrest Memory Gardens, Jeffersonton, Virginia

**Officiating**  
Rev. Lynn Wilbur

**Interment**  
Hillcrest Memory Gardens

**ORIGINAL**

3-28-07

On March 17<sup>th</sup> a very special family member passed away. My brother and sister and myself had to leave town and make arrangements for funeral. ~~From~~ I'm sorry for any inconvenience I may have caused by canceling mediation appt. with Deborah Brown

J. Hankrup  
Janell Gaden

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