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SUPERIOR COURT OF THE STATE OF WASHINGTON
SNOHOMISH COUNTY

In re the Marriage of:)	
)	
RON DOTZAUER,)	No. 93-3-03392-5
)	
Petitioner,)	RESPONDENT'S OPPOSITION
)	TO MOTION TO CONTINUE
v.)	SEALING OF FILE PURSUANT
)	TO GR15, 22 AND 31 AND
ANGELA DOTZAUER nka DOUGLAS,)	OPPOSITION TO
)	APPOINTMENT OF GUARDIAN
Respondent.)	AD LITEM

I. RELIEF REQUESTED

Respondent Angela Douglas (formerly Angela Dotzauer) respectfully requests that the Court deny Ron Dotzauer's motion for continued sealing of the court file and that he deny Ron Dotzauer's motion for appointment of Guardian Ad Litem for their daughter.

II. EVIDENCE RELIED UPON

Angela Douglas relies upon the Declaration of Angela Douglas filed herewith, the files and records in this case, Article I, Section 10 of the Washington Constitution and case law interpreting such provision


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IV. CONCLUSION

For the foregoing reasons, the motion for continued sealing and the motion for appointment of Guardian ad Litem should be denied.

DATED this 19th day of October, 2006.

Davis Wright Tremaine LLP
Attorneys for Respondent Angela Douglas

By 
Michele Earl-Hubbard, WSBA #26454

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3 CERTIFICATE OF SERVICE

4 The undersigned hereby certifies under penalty of perjury under the laws of the State of
5 Washington that the following statements are true and correct:

- 6 1. I am over the age of 18 years and am not a party to the within cause.
7 2. I am employed by the law firm of Davis Wright Tremaine. My business and mailing
8 addresses are both 2600 Century Square, 1501 Fourth Avenue, Seattle, Washington 98101-1688.
9 3. I caused to be served a true copy of the document to which this is attached, titled
10 exactly RESPONDENT'S OPPOSITION TO MOTION TO CONTINUE SEALING OF FILE
11 PURSUANT TO GR15, 22 AND 31 AND OPPOSITION TO APPOINTMENT OF
12 GUARDIAN AD LITEM, on the following per the method indicated:

13 Cynthia R. First 14 Schwimmer First LLP 15 1721 Hewitt Avenue, Suite 600 16 Everett, WA 98201 17 18 <i>Via Legal Messenger</i>	19 Camden Hall 20 Camden Hall PLLC 21 1001 Fourth Avenue, Suite 4301 22 Seattle, WA 98154 23 24 <i>Via Legal Messenger</i>
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25 Dated this 19th day of October, 2006.

26 Barbara J. McAdams
27 Barbara J. McAdams

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SUPERIOR COURT OF THE STATE OF WASHINGTON
SNOHOMISH COUNTY

In re the Marriage of:)	Case No.: No. 93-303392-5
)	
Ron Dotzauer,)	DECLARATION OF ANGELA DOUGLAS
)	
Petitioner,)	
)	
and)	
)	
Angela Dotzauer)	
)	
Respondent.)	
)	
)	

I, Angela Douglas, formerly Angela Dotzauer, hereby declare and state as follows:

1. I am over the age of eighteen and competent to testify to the matters stated herein.
2. I was and am a party to the divorce action the Court is intending to unseal.
3. I have no objection to the files of my divorce being unsealed.

1 4. It was never my intention to respond to or be involved in the
2 discussion of unsealing the divorce file, until Ron Dotzauer, my ex-husband
3 ("Ron"), on a motion on shortened time attempted to draw our daughter into
4 this case.

5 5. I have and have always had custody of our daughter who is now 16
6 years old. I know her wishes in this matter and believe I am competent to
7 determine what is in her best interest.

8 6. I believe Ron is trying to use our daughter as a shield to
9 prevent public disclosure of incidents of his poor judgment, bad behavior and
10 possible illegal actions.

11 7. Ron is correct that our daughter follows politics and is
12 proficient in searching the internet. She has already read many of the
13 articles and comments to date related to her father and our divorce file. The
14 negative comments are hurtful; she loves her father and is concerned for him.
15 However, she does not want to be involved in any way in this matter.

16 8. Ron has yet to have one conversation with our daughter regarding
17 the possibility of negative press and how she may be dealing with the
18 embarrassment. If he had had that discussion, he would know that she does not
19 want a Guardian or attorney appointed on her behalf. She certainly does not
20 want to review documents with a stranger and dredge up years of conflict of
21 which he often made her the center. Appointing a Guardian ad Litem is not in
22 my daughter's best interest. She does not want a Guardian ad Litem appointed
23 for her.

1 9. I am confident that the press is not interested in reporting
2 about me or my daughter. I believe Ron is using our daughter as an excuse to
3 keep records sealed so he can keep secret his own bad behavior.

4 10. The files of my divorce were improperly sealed in 1994.

5 11. I believe the sealed state of my divorce led to improper
6 practices that would otherwise not have occurred.

7 12. Perhaps if the file was not sealed in 1994, Ron would have been
8 more inclined to have accepted the court's financial decisions and been less
9 inclined to wage a vicious 10-year-long attack on me. Likewise, if the court
10 had been operating in public, the court may have been less likely to consider
11 numerous repetitive reconsideration requests by Ron. Perhaps the court would
12 not have modified the decree, child support, and the parenting plan without
13 even a Motion to Modify before it.

14 13. Cynthia First, Ron's wife, representing him may have been
15 considered a "conflict of interest" especially on Motions changing the
16 parenting plan or modification of support.

17 14. An order in this case went missing from a supposedly sealed and
18 protected file.

19 15. The attorney appointed to hear Ron's motion to have his child
20 support reduced ruled on issues for nine months but chose not to disclose a
21 conflict of interest - a personal and business relationship he had with
22 Cynthia First -- until the day of the hearing.

23 16. Now Ron claims he wants a neutral third party to talk with our
24 daughter and review the files with her allegedly to shield our daughter from
25

1 embarrassment. What Ron really wants is to be able to keep secret everything
2 in the file he believes will be embarrassing to himself and Maria Cantwell.

3 17. I believe the court should unseal the file and leave only my
4 daughter's educational grades and her personal health records (if there are
5 any) sealed.

6 18. Ron has the resources and ability under the guise of a Guardian
7 ad litem proceeding to turn this into a court battle over which documents to
8 seal. I believe he will try to redact my responses to his lies and leave
9 only his allegations. The Deposition of Dr. Early and the Report by Dr.
10 Taylor are documents that Ron will likely argue are Health Records, and he
11 will ask for them to be sealed. He will even stoop to say that it is to
12 protect our daughter. They are not health records but are documents that
13 serve as substantial evidence that the allegations he made against me are
14 false.

15 19. My daughter is aware of the issues involved in our divorce. She
16 was forced into and made part of the parenting evaluation and has been
17 unfairly involved in the majority of the 14 volumes of litigation. The
18 request to have her involved again is not about protecting our daughter, but
19 a maneuver to hide behind her to cover up Ron's embarrassing behavior.

20 20. The Washington Constitution mandates "justice in all cases shall
21 be administered openly, and without unnecessary delay." For 12 years my case
22 before this court was deprived of that basic requirement. The file has been
23 sealed and kept secret unlawfully for too long and for no lawful legitimate
24 reason.

