

ORIGINAL FILED

AUG 30 2018

KALISPEL TRIBAL COURT  
CUSICK, WA

KALISPEL TRIBAL COURT

NO. 2017-0061-CV-RO

<u>SHANTEL L. REVAIS (now WHITFORD)</u>	<u>6-29-86</u>
Petitioner	DOB
vs.	
<u>DEAKEN R. SULLIVAN</u>	<u>6-3-86</u>
Respondent	DOB

PETITION FOR RENEWAL  
OF ORDER FOR PROTECTION  
AND NOTICE OF HEARING  
(PT/NTHG)  
(Clerk's Action Required)

- The Order for Protection dated August 30, 2017 will expire on August 30, 2018 <sup>(date)</sup>.
- I want to renew the Order for Protection because: The previous protection order is about to expire and the Respondents still act in the same manner as they did one year ago. The Petitioner and her five children are still dealing with the aftermath of the Petitioner's abuse and neglect, which the children are receiving counseling for. It is in the best interests of the children to not allow the Respondent any contact.
- I want this order to remain effective longer than one year because the respondent is likely to resume acts of domestic violence if the order expires in a year.

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

DATED 8/30/2018 Mel Hammer KTC 040 for Petitioner  
Signature of Petitioner

NOTICE OF HEARING: To the Respondent:  
 A hearing will be held on October 31, 2018, at 1:00 a.m. (p.m) at Kalispel Cusick Court (location) to determine whether the requested renewal of the Order for Protection should be granted.  
**IF YOU DO NOT APPEAR, THE COURT MAY ENTER AN ORDER GRANTING THE REQUESTED RENEWAL.**  
 Dated: 8-30-18  
 COURT ADMINISTRATOR  
 By: J. Bradley, Court Clerk

This document must be served on the other party and proof of service must be in the court file prior to the hearing.



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AUG 30 2018

KALISPEL TRIBAL COURT  
CUSICK, WA

KALISPEL TRIBAL COURT

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4 SHANTEL LAROSE REVAIS ) NO: 2017-0061-CV-RO  
5 (now WHITFORD) )  
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Petitioner, )  
v. )  
DEAKEN RICHARD SULLIVAN )  
Respondent. )

**Summons: Notice about Petition for Parenting Plan, Residential Schedule and/or Child Support**

**To the Respondent:** The Petitioner started a case asking for a parenting order for the children listed above. You must respond in writing for the court to consider your side.

**Deadline!** Your *Response* must be served on the Petitioner within 20 days of the date you were served this *Summons* (60 days if you were served outside of the Kalispel Indian Reservation or Washington State). If the case has been filed, you must also file your *Response* by the same deadline. If you do not serve and file your *Response* or a *Notice of Appearance* by the deadline:

- No one has to notify you about other hearings in this case, and
- The court may approve the Petitioner's requests without hearing your side (called a default judgment)

Follow these steps:

1. **Read** the *Petition* and any other documents you receive with this *Summons*. These documents explain what the Petitioner is asking for.
2. **Fill out** the *Response to Petition for Parenting Plan, Residential Schedule and/or Child Support*. You can get the *Response* and other forms at:
  - The Kalispel Tribe of Indians – Tribal Court website: [www.kalispeltribe.com](http://www.kalispeltribe.com)
  - The Court Administrator – call: (509) 447-7128
  - The Court Clerk's office – call: (509) 447-7131.

1 3. **Serve** (give) a copy of your *Response* to the Petitioner at the address below and to any  
2 other Respondents. You may use certified mail with return receipt requested. For more  
information on how to serve, read Kalispel Law and Order Code, Chapter 3.

3 4. **File** your original *Response* with the court clerk at this address:

4 Court Clerk

5 Mailing Address: Post Office Box 96, Usk, WA 99180

6 Physical Address: 22 Camas Flat Rd, Cusick WA 99119

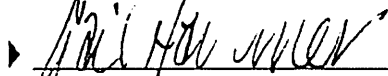
7 **If there is no "Case No." listed on page 1, this case may not have been filed and you  
8 will not be able to file a *Response*. Contact the Court Clerk to find out.**

9 If the case was **not** filed, you must still serve your *Response*, and you may demand that  
10 the Petitioner file this case with the court. Your demand must be in writing and must be  
served on the Petitioner or his/her lawyer (whoever signed this *Summons*). If the  
11 Petitioner does not file papers for this case within 14 days of being served with your  
demand, this service on you of the *Summons* and *Petition* will not be valid. If the  
12 Petitioner does file, then you must file your original *Response* with the court clerk at the  
address above.

13 5. **Lawyer not required:** It's a good idea to talk to a lawyer and we recommend that  
14 you do so if you have any questions, however you may file and serve your *Response*  
without one.

15 **Petitioner or her lawyer fills out below:**

16 UNIVERSITY LEGAL ASSISTANCE

17 

18 Gail Hammer, KTC 040  
19 Attorney for Petitioner

20 August 30, 2018

21 Date

22 I agree to accept legal papers for this case at my lawyer's address:

23 721 N. Cincinnati Street  
PO Box 3528  
Spokane, Washington 99220-3528

(If this address changes before the case ends, you **must** notify all parties and the court clerk in  
writing. You may use the *Notice of Address Change* form. You must also update your  
*Confidential Information Form* if this case involves parentage or child support).

ORIGINAL FILED

JUN 14 2018

KALISPEL TRIBAL COURT  
CUSICK, WA

UNITED STATES OF AMERICA  
KALISPEL INDIAN RESERVATION  
KALISPEL TRIBAL COURT

In Re the Custody of:	)	NO: 2010-0052-CV-DM
AvaLilly Anne Revais, DOB: 10/11/2010	)	
Thomas Patrick Sullivan, DOB: 12/31/2007	)	PETITION TO MODIFY PARENTING
EmmaRose Lee Sullivan, DOB: 09/08/2005	)	PLAN
	)	
SHANTEL LAROSE WHITFORD	)	
	)	
Petitioner,	)	
v.	)	
	)	
DEAKEN RICHARD SULLIVAN	)	
	)	
Respondent.	)	

**Introduction**

Petitioner, Shantel Whitford ("the mother"), by and through her attorneys of record, University Legal Assistance, makes the following petition to modify a parenting plan, grant her full custody of the parties' children, and order the Respondent ("father") to pay child support.

**Petition**

1. My name is Shantel Whitford, and I am the mother of AvaLilly Anne Revais, Thomas Patrick Sullivan, and EmmaRose Lee Sullivan.

1 2. The information in this petition and attached exhibit is about my children AvaLilly Anne  
2 Revais, Thomas Patrick Sullivan, and EmmaRose Lee Sullivan.

3 **History**

- 4 3. This court previously entered a final parenting plan on October 12, 2011.  
5 4. Then, I filed a request for a temporary protection order on August 16, 2017.  
6 5. On August 30, 2017, this Court granted a permanent protection order, which expires on  
7 August 30, 2018 (No. 2017-0061-CV-RO) and restrains Mr. Sullivan from making any  
8 contact with our children and me.

9  
10 **Facts**

11 **The Father's home environment is unsafe.**

- 12 6. Mr. Sullivan's domestic situation has deteriorated, and the current parenting plan will  
13 jeopardize the children's wellbeing by placing them in his care in the future.  
14 7. Mr. Sullivan has been evicted from his home and is currently unemployed.  
15 8. There is evidence that Mr. Sullivan and his girlfriend, Petra Cunningham, consumed  
16 illicit substances at home in the presence of our children.  
17 9. There is also evidence that Mr. Sullivan and his girlfriend, Petra Cunningham, physically  
18 and verbally fought with each other in the presence of our children.

19  
20 **The Mother's home environment is safe  
and conducive to the children's wellbeing.**

21 10. I have a loving and stable relationship with my children and my husband, Ni'Ki  
22 Whitford.

23 11. I take care of my children's daily needs, such as feeding, clothing, physical care,  
24 supervision, medical and dental visits, day care, and other activities.  
25

1 12. I have also been taking my children to counseling.

2 13. I make sure my children attend school.

3 14. I have steady employment as the manager of Crossroads restaurant outside of Usk,  
4 Washington, and my husband is steadily employed as well.

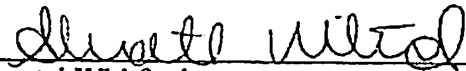
6 **Conclusion**

7 It is in the best interest of our children that the mother, Shantel Larose Whitford, be  
8 awarded sole physical custody of our children. The father's history of drug use and physical  
9 fighting in front of our children shows that the father cannot currently provide a safe  
10 environment for our children. The mother's home environment, on the other hand, is safe,  
11 healthy, and wholesome. For these reasons, the Court should grant the mother sole legal and  
12 physical custody of the parties' children. The father should spend time with the parties' children  
13 in accordance with the Proposed Parenting Plan, attached as **Exhibit 1**.

14 WHEREFORE, Petitioner asks that the Court enter its Judgment of Modification after  
15 appropriate notice and enter an order for child support in an amount to be determined at hearing.

16 I declare under penalty of perjury under the laws of the Kalispel Tribe that the foregoing  
17 is true and correct.

18 Signed at USK, Washington the 22 of March, 2018.

19   
20 \_\_\_\_\_  
Shantel Whitford

21 DATED this 22 day of March, 2018

22 UNIVERSITY LEGAL ASSISTANCE

23 \_\_\_\_\_  
24 CHRISTOPHER LEON-KTC 171  
25 Spokesperson for Petitioner

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*Gail Hammer*  
\_\_\_\_\_  
GAIL HAMMER-KTC 040  
Supervising Attorney/Attorney for Petitioner



JUN 21 2018

KALISPEL TRIBAL COURT

KALISPEL TRIBAL COURT  
CUSICK, WA

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IN RE THE CUSTODY OF:

Case No. 2010-0052-CV-DM

AVALILLY REVAIS DOB: 10/11/10  
THOMAS SULLIVAN DOB: 12/31/07  
EMMAROSE SULLIVAN DOB: 09/08/05

AMENDED SUMMONS (20 DAY)

SHANTEL REVAIS  
PETITIONER

AND

DEAKEN SULLIVAN  
RESPONDENT.

TO THE RESPONDENT: Deaken Richard Sullivan

1. The petitioner, Shantel LaRose Whitford, has started an action in the above-referenced cause of action by filing a Petition to Modify Parenting Plan. Additional requests, if any, are stated in the attached petition.
2. You must respond to this summons and petition. If you do not file and serve your response within twenty (20) days, (60 days if you are served outside the boundaries of the Kalispel Indian Reservation) after the date this summons was served on you, excluding the day of service, the court may, without further notice to you, enter a default judgment against you ordering the relief requested in the petition. If you serve a response on the petitioner, you are entitled to a hearing before an order may be entered.
3. If this action has not been filed with the court, you may demand that the petitioner file this action with the court. If you do so, the demand must be in writing and must be served upon the petitioner. Within fourteen (14) days after you serve the demand, the petitioner must file this action with the court, or the service on you of this summons will be void.
4. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response, if any, may be served on time. All attorneys and/or spokespersons must first be approved to so act before the Kalispel Tribal Court.
5. One method of serving a copy of your response on the petitioner is to send it by certified mail with return receipt requested.

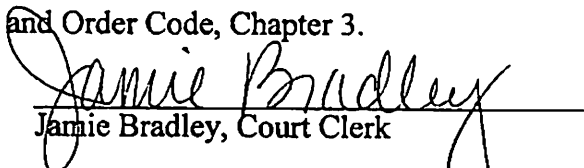
AMENDED SUMMONS (20 DAY)

Kalispel Tribal Court  
P.O. Box 96  
Usk, Washington 99180  
(509) 445-1664/(800)479-6357  
Fax: (509) 445-4039

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This summons is issued pursuant to Kalispel Law and Order Code, Chapter 3.

Dated: 06/21/2018

  
Jamie Bradley, Court Clerk

**FILE ORIGINAL WITH THE  
CLERK OF THE COURT AT:**

Kalispel Tribal Court  
P.O. Box 96  
Usk, WA 99180

**SERVE A COPY OF YOUR RESPONSE  
ON THE PETITIONER'S ATTORNEY AT:**

University Legal Assistance, Gail Hammer, Attorney  
721 North Cincinnati Street, PO Box 3528  
Spokane, WA 99220-3528

AMENDED SUMMONS (20 DAY)

Kalispel Tribal Court  
P.O. Box 96  
Usk, Washington 99180  
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Fax: (509) 445-4039