

**REQUESTED COURT ORDER TO MOVE TO ENCINITAS WITH MINOR CHILD**

		<b>Response</b>	<b>Live w/ Father</b>
1	Petitioner requests the court's permission to move to Encinitas, CA. (located 107 miles from the parties' current residence) with the parties' only minor child, Killian (DOB: 08/21/2022).	<ul style="list-style-type: none"> <li>• What is reason and <b>urgency</b> for the move</li> <li>• No reason to move child 107 miles from father due mother's employment is 100% remote</li> <li>• This is strictly the mother's desire because she does not want to live in Los Angeles</li> </ul>	<ul style="list-style-type: none"> <li>• Met and lived in LA for duration of the relationship</li> <li>• Child was born LA and has has been in his current home (Valley Village, CA) since birth</li> <li>• Refer to No. 2</li> </ul>
2	This move is in the best interests of Killian given Respondent's unemployment, instability.	<ul style="list-style-type: none"> <li>• False statement</li> <li>• Held a six-month contract in 2024</li> <li>• Starting a bartending service and developed a partnership with an established catering company</li> <li>• Since arriving in 2008, have had steady work at major studios till 2023, all companies within the Animation Guild IATSE Local 839</li> <li>• Entertainment/Animation industry has shifted due to <ul style="list-style-type: none"> <li>○ Outsourcing</li> <li>○ Introduction to AI</li> <li>○ Actor and Writer and strikes</li> <li>○ Resume has shown consistent employment and education with top schools and employers, this does not indicate a person without a plan to succeed and not able to provide for family (<a href="#">Resume attached</a>)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Taking steps to prolong career to support family and obtain a flexible schedule to be present for Killian <ul style="list-style-type: none"> <li>○ Updated resume and portfolio to seek work in current industry (<a href="http://www.3dkarna.com">www.3dkarna.com</a>)</li> <li>○ Starting a small company with the intent of additional income and to create a consistent flow of income between industry contracts</li> <li>○ Applied to a Top 5 EMBA program to change careers to position me for longer employment and non-union work hours (Classes in LA, one weekend a month for 21 months) with the intent to stay in the entertainment</li> <li>○ Taking courses (Hockey GM &amp; Scouting) for additional sources of income</li> <li>○ Furthermore, if able to find work in studios, most studios are located in the San Fernando Valley</li> </ul> </li> </ul>
3	On June 3, 2025, Petitioner and Child will relocate to 950 #2 Saxony Rd., Encinitas, CA. 92024. A photograph of this huge, one-acre property is shown in Exhibit A, page 1.	<ul style="list-style-type: none"> <li>• No need to relocate</li> <li>• June 3, what is the <b>urgency</b> as petitioner has fully remote job</li> <li>• Child already has a home (<a href="#">see pics below</a>)</li> <li>• Child is established and enrolled in a school system</li> <li>• Has a community of friends from both mother and father</li> <li>• Has access to pool, and neighbors of similar age in same complex</li> </ul>	<ul style="list-style-type: none"> <li>• Existing child's home (<a href="#">Redfin description listed below</a>) <ul style="list-style-type: none"> <li>○ 1130 sq ft 2BR/2BA townhome</li> <li>○ Condo complex located on 1.48 acres with common pool</li> <li>○ 2 car attached garage</li> <li>○ Laundry and dishwasher</li> <li>○ New renovated with new Kitchen in summer of 2023</li> <li>○ Child has - <ul style="list-style-type: none"> <li>■ Own bedroom with bunk beds and play area</li> <li>■ Own Bathroom with tub</li> <li>■ Garage for storage, mud room area</li> <li>■ Intend to make dining area additional play area</li> </ul> </li> </ul> </li> </ul>
4	Petitioner will pay \$2200 per month rent for a newly-constructed, 384 square foot ADU	<ul style="list-style-type: none"> <li>• Petitioner can find an apartment within 25 miles of Valley Village larger than a 384 sq ft ADU at or around \$2200</li> <li>• (<a href="#">Housing in Valley Village at \$2200</a>)</li> <li>• Is it new constructed ADU or is it the existing ADU on site</li> <li>• If ADU will be constructed and is not existing ADU on property, respondent requests: <ul style="list-style-type: none"> <li>○ To see plans for said ADU</li> <li>○ Confirmation from owners</li> <li>○ Date of completion as June 3, 2025 is not feasible</li> <li>○ Interior pictures</li> <li>○ Child's sleeping arrangements</li> <li>○ Bathroom as child requires tub</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Refinanced townhome to a 15yr mortgage, no rent</li> <li>• Petitioner's future housing is undetermined</li> <li>• Part of dissolution of marriage was due to petitioner wanting to move in to larger property, however she is moving the child to property ⅓ smaller than current residence</li> </ul>
5	June through July 2025 is a transition period during which time both parents will: <ol style="list-style-type: none"> <li>Spend time at Killian's new residence with Killian.</li> <li>Implement 'nesting' opportunities for DEV (Father) at the new residence.</li> <li>Establish a shared custody schedule where Killian is with Petitioner Monday through Friday and alternate weekends in Encinitas.</li> <li>Take Killian on family outings to help Killian adjust to the environment.</li> <li>Petitioner may also spend time with Killian in Valley Village.</li> </ol>	<ul style="list-style-type: none"> <li>• Will NOT agree to any of the following until court has determined a fair and reasonable shared custody agreement and schedule</li> <li>• 4 days/month is not enough given respondent currently handles at least 50% of the child care and the majority of household responsibilities; there is no reason for the move other than to hurt the relationship between father/son</li> </ul>	<ul style="list-style-type: none"> <li>• Transition period is completely unnecessary as he is already established in a safe living environment currently</li> <li>• If Killian is moved in June, it will be his third day care/pre-school in less than a year <ul style="list-style-type: none"> <li>○ First institution was a day care from 8:30am - 4pm</li> <li>○ Second institution was a preschool, moved child for following reasons <ul style="list-style-type: none"> <li>■ Extended hours 8:30am to 5:30pm</li> <li>■ Structured in learning curriculum</li> <li>■ Cost was cheaper</li> <li>■ School recommended by petitioner's family friend</li> </ul> </li> </ul> </li> <li>• Transitions are not easy for children</li> </ul>
6	Petitioner will take time off work during June and July to help facilitate a smooth transition.	<ul style="list-style-type: none"> <li>• Petitioner should utilize time to find affordable and suitable housing for child and self as custody agreements are being negotiated and determined</li> <li>• To assume June and July as transition period is premature</li> </ul>	

**PROPOSED CUSTODY AND VISITATION SCHEDULE**

		<b>Response</b>	<b>Live w/ Father</b>
7	Killian will reside with Petitioner from Sunday evening through Friday evening weekly.	<ul style="list-style-type: none"> <li>● Petitioner has proposed 85/15% schedule</li> <li>● Petitioner proposed earlier 70/30% schedule (verbally) because she doesn't think 2/2/3 works - she doesn't believe this works because in her prior marriage, her spouse had 2/2/3 custody of his two kids (these kids were older)</li> <li>● Proposed custody proposal benefits mother only and does not consider fairness and flexibility to the respondent nor considers the most important and crucial party, the child</li> <li>● Will NOT agree to any of the following until court has determined a fair and reasonable shared custody agreement and schedule</li> </ul>	<ul style="list-style-type: none"> <li>● Respondent will not accept anything less than 50/50%</li> <li>● Child will not be forced to grow up with limited interaction with his father due to mother's desires</li> <li>● Willing to accept the following for 50/50 custody schedule if Maren lives within 25 miles of Valley Village: <ul style="list-style-type: none"> <li>○ 2/2/3 schedule</li> <li>○ 3/4 schedule alternating weeks to accommodate weekends</li> <li>○ One week on/one week off schedule (Sunday to Sunday or Friday to Friday or Monday to Monday if drop-off/pick-up is at child's school)</li> <li>○ If petitioner lives more than 25 miles from Killian's current residence and school, respondent proposes 70(Father)/30(Mother)%, so child - <ul style="list-style-type: none"> <li>■ Stays at same school</li> <li>■ Continues to have own room, bathroom, and play area</li> </ul> </li> <li>○ Will also be willing add video calls to mother every other day</li> <li>○ Extended visits, when child not required to be in school</li> </ul> </li> <li>● If respondent is accepted and enrolls into the EMBA program, weekends may be negotiated as classes are held one weekend a month</li> <li>● This schedule is fair to both parties and benefits most importantly the child</li> </ul>
8	Each party will alternate weekends with Killian, starting with Respondent having Killian June 6-8th, 2025 in Valley Village.	Refer to <b>Response</b> for No. 7	Refer <b>Live w/ Father</b> for No.7
9	Transitions will take place halfway between the two parties: around Irvine or Newport Beach, such as the parking lots of Sprouts in Irvine or the Whole Foods at Fashion Island.	<ul style="list-style-type: none"> <li>● If both parents are located within 25 miles of each other, transition times and location for pick-up/drop-off should be made according to child's schedule and location such as school and/or extra curricular activities</li> <li>● If parents are located more than 25 miles apart, will agree upon pick-up/drop off location</li> </ul>	Refer to <b>Response</b> for No. 9
10	Friday meet-up will be between 6:30-7:30 pm and Sunday meet-up will be between 5-6pm, the times account for traffic patterns between the two locations.	Refer to <b>Response</b> for No. 9	Refer to <b>Response</b> for No. 9
11	Respondent may have "nesting" visitation with Killian in Encinitas from Thursday after school to Friday evening of the Petitioner's weekend, he may stay in the guest suite of the main residence during this time.	<ul style="list-style-type: none"> <li>● Respondent is not comfortable staying in main house with ex in-laws</li> <li>● If respondent employment is on-site, will have to take time off from work, this is a complete disregard for proper co-parenting</li> </ul>	<ul style="list-style-type: none"> <li>● Father will not "nest" in an environment that may cause tension where the child can witness any unnecessary conflict</li> </ul>
12	Respondent may have Killian on Monday holidays following his scheduled weekends.	<ul style="list-style-type: none"> <li>● Will Accept, however, this will and should depend on schedule appointed by court</li> </ul>	Refer to <b>Response</b> for No. 12
13	A more detailed holiday and vacation schedule will be set forth in a proposed parenting plan.	<ul style="list-style-type: none"> <li>● Mother and father should get a full week in the summer for a vacation; if more time is needed, may be negotiated</li> <li>● Fall and Spring breaks may be negotiated</li> <li>● Mother will have Easter and Christmas</li> <li>● Father will have Thanksgiving</li> <li>● New Year's will alternate years, but willing to negotiate if travel is planned by one party</li> </ul>	<p>Proposed custody information provided in a separate document</p> <p>Refer to <b>Response</b> No. 13</p>

**KILLIAN'S ADU IN ENCINITAS IS NEW, SAFE, HUGE LOT, NEAR THE BEACH**

		<b>Response</b>	<b>Live w/ Father</b>
14	Killian will have formidable, stable, affordable housing, living in the ADU located on the huge one-acre residential property owned by Petitioner's parents. See Exhibit A, page 1. A floor plan of the newly constructed, 384 square-foot ADU is shown in Exhibit A, page 2.	<p>See Response to <b>Live w Father</b> No. 3 and <b>Response</b> to No.4 bullet 4</p> <ul style="list-style-type: none"> <li>● This 384 sq ft ADU is suited for a bachelor</li> <li>● Due petitioner's messy lifestyle, ADU not having a dishwasher should be a concern</li> <li>● ADU layout has only one bedroom and one bathroom with no tub, as child still bathes in a bathtub</li> <li>● Petitioner will have downsize significantly to accommodate all her possessions to live comfortable for two people within the confines of 384 sq ft</li> </ul>	<p>See Response to <b>Live w Father</b> No. 3</p> <ul style="list-style-type: none"> <li>● This will always be his home, not his grandmother's</li> <li>● This will be the most consistent living situation for the early years of his life</li> <li>● Child will live in a 1130 sq ft with his</li> <li>● own room with personal closet and personal play area</li> <li>● own bathroom with tub</li> <li>● Additional play area depending how dining area will be utilized</li> <li>● Garage space for storage, sports equipment</li> <li>● Newly renovated kitchen with additional storage put under countertop and can seat up to three people</li> <li>● Newly poured 160 sq ft concrete patio</li> <li>● Central Heating and AC</li> <li>● Separate entrance from main complex</li> <li>● Community pool</li> </ul>
15	Killian's ADU in Encinitas is located only two miles from the beach. The rental price of \$2200 per month is fixed, rent-controlled, and includes utilities (the ADU is solar-powered).	<ul style="list-style-type: none"> <li>● Valley Village is located from within 26 miles from the following beaches <ul style="list-style-type: none"> <li>○ Will Rogers Beach</li> <li>○ Ginger Rogers Beach</li> <li>○ Sorrento Beach</li> <li>○ Santa Monica Beach</li> <li>○ Venice Beach</li> <li>○ Charlie Beach</li> <li>○ El Segundo Beach</li> <li>○ Manhattan Beach</li> </ul> </li> </ul>	<p>Refer <b>Live w/ Father</b> for No.7</p> <ul style="list-style-type: none"> <li>● Public beaches all within driving distance</li> <li>● Three public parks within walking distance</li> <li>● 11 public parks within five miles</li> </ul>
16	Killian's ADU is located in an excellent school district with an elementary school nearby.	<p>See <b>SUPERIOR EDUCATIONAL OPPORTUNITIES IN ENCINITAS</b> Section</p>	<ul style="list-style-type: none"> <li>● Petitioner helped find and select child's current townhouse due to being in a excellent school district</li> <li>● Colfax Charter Elementary school is walking distance from home</li> <li>● Additional information of Colfax Elementary addressed in <b>SUPERIOR EDUCATIONAL OPPORTUNITIES IN ENCINITAS</b> Section</li> </ul>
17	Respondent will have unfettered access to a large Guest Suite in the main house during the transition period and beyond, allowing Respondent to have 'nesting' opportunities with Killian	<p>Refer to <b>Response</b> for No. 11</p>	<p>Refer to <b>Response</b> for No. 11</p>

**ENHANCED FAMILY SUPPORT SYSTEM IN ENCINITAS**

		<b>Response</b>	<b>Live w/ Father</b>
18	Killian's maternal grandparents, "Mae Mae" Mary Gafner (58 years-old) and "Papa Stan" Stan Gafner (71 years-old) live in the main house on the same property as Killian's ADU.	<ul style="list-style-type: none"> <li>• Mary Gafner gave Maren up for adoption at the age of 17, and chose to not have any other children there after, therefore has limited parental experience</li> <li>• Stan Gafner is not a maternal grandparent and has no blood relation to Killian</li> </ul>	<ul style="list-style-type: none"> <li>• Being the child's biological father and providing a home with more personal resources is better for the child</li> </ul>
19	Killian has an established, loving relationship with these grandparents. Papa Stan is retired and Grandma Mae Mae will retire by June 2027, ensuring stable support for Killian.	<ul style="list-style-type: none"> <li>• The Gafner's just recently purchased a camper van and have significant plans for domestic travel during said retirement, their availability could not be as stable as petitioner has implied</li> <li>• Child <b>also</b> has stable support from respondent's family</li> </ul>	<ul style="list-style-type: none"> <li>• Petitioner and respondent chose respondent's brother and wife to be child's legal guardians should anything happen to petitioner and respondent</li> <li>• On respondent's family side, child has one grandfather, one uncle with two children, four aunts and one uncle that do not have children of their own and will provide any means necessary to ensure financial and physical stability and support for child if respondent requires assistance</li> <li>• Child has established relationships with all said relatives from extended stays and visits with each relative</li> <li>• All said relatives', except for grandfather, ages range from 49-54</li> <li>• Child also has a network of five cousins ranging from 5-20 yrs of age that he has spent time with</li> <li>• All respondent's relatives, except for cousins, own their own properties and have at least one additional room that Killian could have if in the unforeseen worse case scenario</li> </ul>
20	Killian's grandparents are available to provide child care when needed by either parent.	<ul style="list-style-type: none"> <li>• It is imperative that if a parent needs child care, parents should be within a reasonable distance from each other to be available for the child</li> <li>• It is premature to assume that the grandmother and grandmother's husband will be available if child care is needed</li> </ul>	<ul style="list-style-type: none"> <li>• If petitioner is not available, respondent should and wants to be the first option to be responsible for the child</li> <li>• Respondent's brother and Killian's four aunts, and uncle have offered to be there for child care when needed due to their flexible schedules and ability to work remotely</li> <li>• Respondent has established relationships with friends that have offered support for emergency circumstances and have been listed as emergency contacts for child's at child's school <ul style="list-style-type: none"> <li>○ Nick Puetz and Stephanie Hachem (husband and wife)</li> <li>○ Parents of 1.5 yr old Clay Puetz</li> <li>○ Reside in Burbank, CA</li> <li>○ 6.4 mi from Respondent's home</li> <li>○ 3.6 mi from Killian's school</li> <li>○ Both work in burbank at same company and husband works completely remotely</li> <li>○ <a href="#">See attached form from Magical Garden Day Care</a></li> </ul> </li> </ul>

**SUPERIOR EDUCATIONAL OPPORTUNITIES IN ENCINITAS**

		<b>Response</b>	<b>Live w/ Father</b>
21	DEV and I virtually toured a preschool, Kids By The Sea Olivenhain, on October 8, 2024. The school is located only 4.5 miles from Killian's home on 950 #2 Saxony Rd., Encinitas, CA. 92024.	<ul style="list-style-type: none"> <li>Respondent appeased petitioner to avoid conflict and agreed this tour with the intent explore other schools if child was not accepted in to Valley Village Montessori School</li> <li>Child currently enrolled at school petitioner and respondent joint agreed on</li> </ul>	<ul style="list-style-type: none"> <li>Child's home is 2.9 to Beginnings Learning Center (BLC), North Hollywood, CA</li> <li>Web Address <a href="https://www.beginningslc.com/location-north-hollywood/">https://www.beginningslc.com/location-north-hollywood/</a></li> </ul>
22	Killian is on the waitlist for admission to Kids By The Sea (he will likely be admitted).	<ul style="list-style-type: none"> <li>There is no guarantee child will be accepted</li> <li>Tuition is \$2069.4/month, summer program optional</li> </ul>	<ul style="list-style-type: none"> <li>Child is already enrolled at BLC</li> <li>Tuition is \$1750/month, summer program included</li> </ul>
23	I am securing additional tours of various preschools. I welcome and encourage DEV's participation in selecting a mutually agreeable preschool for Killian.	<ul style="list-style-type: none"> <li>Will NOT agree to any school change until court has determined a fair and reasonable shared custody agreement</li> </ul>	See <b>Response</b> to No. 23
24	Moving now will allow Killian to establish continuity at one preschool for two years prior to Kindergarten.	<ul style="list-style-type: none"> <li>If child moves to a new school, this will be the child's third institution within a year</li> <li>Petitioner is proposing enrolling child at new school at higher tuition cost for two years</li> </ul>	<ul style="list-style-type: none"> <li>Child has been at BLC for one year, staying at current school already establishes continuity</li> <li>Respondent proposes                             <ul style="list-style-type: none"> <li>No school change</li> <li>One year (2025-2026) remaining at BLC at a lower cost</li> <li>Enroll (2026-2027) child at the Top 9th California Charter school, Colfax Charter Elementary, for Universal Transitional Kindergarten (UTK) at no cost</li> </ul> </li> <li>This saves both parties at least \$10K each at the second year, and most importantly, the child does not move schools and establishes his elementary school tenure at an earlier age</li> </ul>
25	Encinitas offers highly rated, reputable preschools and K-12 education.	See <b>School Comparisons</b> below	See <b>School Comparisons</b> below

**School Comparisons**

<b>Category</b>	<b>Capri Elementary (Encinitas, CA)</b>	<b>Colfax Charter (Valley Village, CA)</b>	<b>Source</b>
Affiliated Charter School	No	<b>Yes</b>	<a href="https://www.ed-data.org (Capri)">https://www.ed-data.org (Capri)</a> <a href="https://www.ed-data.org (Colfax)">https://www.ed-data.org (Colfax)</a>
Offers Universal Transitional Kindergarten	No	<b>Yes</b>	Google
Blue Ribbon Recognition	No	<b>Yes (2022)</b>	<a href="https://publiccharters.org">https://publiccharters.org</a>  Given only to 29 schools in California and 297 schools nationwide
Numbers	No. 4 of 9 Encinitas Union Elementary Schools No. 904 California Elementary Schools  Overall Score 83.89/100 <b>23:1</b> Student/Teacher Ratio 67% Reading Proficiency 62% Math Proficiency	No. <b>9</b> California Charter Elementary Schools No. <b>15 of 490</b> Los Angeles Unified School District No. <b>133</b> California Elementary Schools Overall Score <b>97.63/100</b> 25:1 Student/Teacher Ratio <b>83%</b> Reading Proficiency <b>81%</b> Math Proficiency	<a href="https://www.usnews.com (Colfax)">https://www.usnews.com (Colfax)</a> <a href="https://www.usnews.com (Capri)">https://www.usnews.com (Capri)</a>
Distance	1.3 mi	0.7 mi	Google Maps
Farm w/ live animals	No	<b>Yes</b>	<a href="#">See Photos</a>
Celebrate Diwali (Child is Half Indian )	No	<b>Yes</b>	<a href="#">See Photo</a>

**RESPONDENT'S CAREER INSTABILITY, LACK OF GAINFUL EMPLOYMENT**

		<b>Response</b>	<b>Live w/ Father</b>
26	DEV has been out of full-time work for the past two years, creating ongoing financial stress on the household. DEV doesn't work; he relies on passive rental income from his father's house	<ul style="list-style-type: none"> <li>• Statement is false and an attack of character</li> <li>• Respondent had a contract work for 6 months in 2024 as mentioned in <b>Response 2</b></li> <li>• Have had consistent work at top rated companies since 2008 and has worked longer than petitioner (<a href="#">Resume attached</a>)</li> <li>• Petitioner depended on passive income to support expenses incurred with respondent (this income belongs to my father/Killian's grandfather but he has allowed us to use the funds for the benefit of the marriage and Killian)               <ul style="list-style-type: none"> <li>◦ Wedding</li> <li>◦ Out of Pocket medical expenses for pregnancy IVF, genetic testing midwives, and pre and post doulas</li> <li>◦ house renovation</li> <li>◦ New car</li> </ul> </li> <li>• Petitioner has been living with respondent prior to marriage since 2019 (when respondent purchased home) and during early stages of marriage (married in 2021) respondent paid all housing expenses</li> <li>• Additional comments regarding "DEV" doesn't work" in <b>Response 2</b></li> </ul>	<ul style="list-style-type: none"> <li>• Respondent is seeking additional sources for additional income and choosing to go back to school to position himself for better, more, and higher paying job opportunities to prolong his career; all actions for the intent to provide for the child</li> <li>• Additional side/part-time (Bartending Services and Hockey Scouting) are for consistent cash flow income between contract positions, which has become the trend of artist positions</li> <li>• As marriage is dissolved, said passive income will be for child's future, education, extra curricular activities, retirement, and investments</li> <li>• Pursuing additional sources of income, going back to school, and pivoting careers is far from someone that "doesn't work." These pursuits are also to be an example for the child on how to face adversity</li> </ul>
27	DEV wants to establish a mobile bartending trailer business, a goal he could pursue from Encinitas, particularly as his business associate works out of Orange County. DEV also says he wants to pursue a new career as a hockey scout. Both of these career paths seemingly involve non-traditional (not "9 to 5"), unpredictable and varied weekend work hours.	<ul style="list-style-type: none"> <li>• Respondent has made his school, his employment, and child's education a priority; both are located in LA</li> <li>• Bartending services business is to supplement primary employment</li> <li>• Scouting is remote with flexible hours and is to supplement primary employment</li> <li>• Petitioner's lack of knowledge of these career fields makes this statement inaccurate; see <b>Live w/ Father</b> No. 27</li> </ul>	<ul style="list-style-type: none"> <li>• The EMBA program is designed for senior level employees (45-55 avg. age) that are further along in their careers and have established family responsibilities such as children:               <ul style="list-style-type: none"> <li>◦ Classes are held one weekend a month for 21 months</li> <li>◦ Homework, exams, and projects are done online</li> <li>◦ Minimal travel is required for orientation and graduation</li> <li>◦ Most importantly, located in Los Angeles where the child lives</li> </ul> </li> <li>• The bartending services is dedicated to serving private events, and once a custody schedule has been determined, the business will revolve around the child's schedule</li> <li>• Because of the respondent's familiarity of social events within the entertainment business, respondent would like to keep the bartending service serving the Los Angeles area</li> <li>• Hockey Scouting is a regional position; if respondent were to obtain a position, any on-site scouting will be in the Southern California region; and due to technology and since COVID, most scouting has been done remotely through video software</li> <li>• All future employment plans are to create additional employment opportunities with a flexible schedule to be available for the child</li> </ul>
28	DEV's current and prospective work life demands a need for reliable child care. The move to Encinitas guarantees that Killian will have reliable, no cost childcare from his grandparents.	<ul style="list-style-type: none"> <li>• Respondent can also obtain child care at no cost through family relatives as well</li> <li>• Petitioner is assuming the grandparents will be more dependable than respondent (a primary legal parent) regarding childcare</li> <li>• From all the visits, respondent has not seen or aware of a time where grandmother's husband (age 71) took care of the child alone</li> <li>• Petitioner's grandmother and husband have recently purchased a RV van with the intention to travel more, thus may not be as available for childcare as petitioner is depending on</li> </ul> <p>See comments in <b>Responses</b> and <b>Live w/ Father</b> Nos. 19 and 20</p>	<ul style="list-style-type: none"> <li>• At the moment, respondent currently not working makes him more available for the child than the petitioner</li> <li>• Reasons why father should have a primary role child -               <ul style="list-style-type: none"> <li>◦ As the biological parent, he has primary rights regarding decisions about child's health, education, and welfare</li> <li>◦ Because a child usually benefits from having a strong, active parental figure who can guide them, set boundaries, and be involved daily                   <ul style="list-style-type: none"> <li>■ Fathers are expected to fill that role. Grandparents are more often supporters or helpers, not primary caregivers</li> </ul> </li> </ul> </li> <li>• Respondent is concerned, if child spends significant portion of time at grandparents, the grandmother will interfere with primary decisions concerning the child as she has interfered in discussions or our family living situation</li> </ul> <p>Regarding child care, see comments in <b>Responses</b> and <b>Live w/ Father</b> Nos. 19 and 20</p>
29		<p>Please see <b>Response</b> Nos. 2 and 26 and attached resume to "Historical unemployment" comment</p> <ul style="list-style-type: none"> <li>• Technically respondent has only been unemployed for six months</li> <li>• Refer to petitioner's comments in <b>MOM'S CAREER INSTABILITY NECESSITATES A MOVE TO ENCINITAS</b> section as petitioner's employment could be just as unstable</li> </ul>	<ul style="list-style-type: none"> <li>• If necessary, respondent can access funds from the following to maintain child's standard of living               <ul style="list-style-type: none"> <li>◦ Rent from father's real estate property (where passive income has come from) 2024 income brought in (\$\$\$\$)</li> <li>◦ Borrow against inheritance from father</li> <li>◦ Investment account (\$\$\$\$ as of Date) managed by family and Fidelity Investments advisor</li> </ul> </li> </ul>

		<ul style="list-style-type: none"><li>● The following links are Cost of Living (COL) comparisons between child's current residence and Encinitas<ul style="list-style-type: none"><li>○ <a href="https://www.erieri.com (Burbank)"><u>https://www.erieri.com (Burbank)</u></a></li><li>○ Encinitas is COL is 8% more than Burbank</li><li>○ <a href="https://www.erieri.com (North Hollywood)"><u>https://www.erieri.com (North Hollywood)</u></a></li><li>○ Encinitas is COL is 15% more than North Hollywood</li></ul></li><li>● Respondent has access to additional funds to maintain child's current standard of living, refer <b>Live w/ Father</b> No. 29</li><li>● Financial disclosures will also determine if petitioner can afford Encinitas</li></ul>	<ul style="list-style-type: none"><li>○ Retirement account (\$\$\$\$ as of Date) managed by family and Fidelity Investments advisor</li><li>○ Funds from from financially stable brother, Sujeet Karna, and cousins, Anita and Manisha Bathija</li></ul>
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**MOM'S CAREER INSTABILITY NECESSITATES A MOVE TO ENCINITAS**

		<b>Response</b>	<b>Live w/ Father</b>
30	I have worked for my current employer for 3.5 years, though I will likely be laid off during the next year due to underperformance in the market of my department.	<ul style="list-style-type: none"> <li>● Petitioner should be taking steps to secure future employment such as respondent</li> </ul>	<ul style="list-style-type: none"> <li>● Respondent is taking step now to secure employment and financial stability for child</li> </ul> <p>Refer to <b>Live w/ Father</b> No. 29</p>
31	The national job market, particularly in the education technology sector, has experienced significant contraction while the number of applicants is exponentially increasing. I am facing significant career challenges; it's not feasible for me to maintain our current standard of living on my own (not living with DEV) here in Los Angeles, nor can DEV provide the same for Killian.	<ul style="list-style-type: none"> <li>● The whole economy is struggling right now</li> <li>● The Education Technology Market and U.S Healthcare Professional Training Market, both industries the petitioner works in, area on the rise according Grand View Research, see links                             <ul style="list-style-type: none"> <li>○ <a href="https://www.grandviewresearch.com">https://www.grandviewresearch.com</a> (Education)</li> <li>○ <a href="https://www.grandviewresearch.com">https://www.grandviewresearch.com</a> (Healthcare)</li> </ul> </li> <li>● Petitioner is claiming she will not be able afford housing in LA, yet she is choosing to live in and area where the COL is higher and she is employed in industry that is projected to grow</li> </ul> <p>Refer <b>Response</b> No. 29 bullet No. 4 regarding the COL in Encinitas is higher</p>	Refer to <b>Live w/ Father</b> No. 29
32	A new position in my current job market would likely result in a 20-40% salary reduction. A contract position would result in lower income and no health insurance benefits, further increasing my costs.	Refer <b>Response</b> No. 30	Refer to <b>Live w/ Father</b> No. 30
33	I need to build a financial safety net to ensure I can provide for Killian in the event of a layoff or unexpected emergency. Fixed living expenses will greatly promote this process. Moving to Encinitas, where Killian has strong family support, provides needed financial security.	<ul style="list-style-type: none"> <li>● Financial disclosures will also determine if mother can afford Encinitas</li> </ul>	Refer to <b>Live w/ Father</b> No. 19, 20 and 29

**PRIOR DISCUSSIONS ABOUT RELOCATING TO ENCINITAS**

		<b>Response</b>	<b>Live w/ Father</b>
34	DEV and I have discussed moving to Encinitas following Killian's birth, primarily for family support and an improved lifestyle.	<ul style="list-style-type: none"> <li>● Petitioner and respondent also discussed renovating current condo and living there through child's elementary school because of the Colfax school district, then moving into respondent's father's house</li> <li>● The idea of moving to Encinitas was to be done when child was at an older age</li> <li>● These discussions were all discussed with intent that petitioner and respondent stayed married, since parties are divorcing, respondent has no intent of moving to Encinitas now or in the near future</li> </ul>	<ul style="list-style-type: none"> <li>● Respondent chooses to stay in Los Angeles to give child better resources and education</li> <li>● Refer to sections:                             <ul style="list-style-type: none"> <li>○ <b>REQUESTED COURT ORDER TO MOVE TO ENCINITAS WITH MINOR CHILD</b></li> <li>○ <b>PROPOSED CUSTODY AND VISITATION SCHEDULE</b></li> <li>○ <b>SUPERIOR EDUCATIONAL OPPORTUNITIES IN ENCINITAS</b></li> </ul> </li> </ul>
35	DEV expressed interest and willingness to move to Encinitas during the past two years.	Refer to <b>Response</b> No. 30	Refer to <b>Live w/ Father</b> No. 30
36	DEV and I extensively discussed our concerns about declining conditions in Los Angeles, always with an eye towards ensuring the best possible environment for Killian to grow up.	<ul style="list-style-type: none"> <li>● Both locations have their share of crimes</li> <li>● Yes Encinitas has lower crime rate as they are half the population of North Hollywood</li> </ul>	<ul style="list-style-type: none"> <li>● Respondent is hoping child's current home conditions and school district outweigh the crime statistics</li> </ul>
37	The recent wildfires in Los Angeles have caused housing rental prices to soar. Those demanding rental housing include wealthy, displaced homeowners (who lost their homes)	<ul style="list-style-type: none"> <li>● Both location are susceptible fires and Encinitas could also encounter the devastation that happened to Los Angeles in January 2025</li> <li>● At petitioners budget of 2200, there is available housing, see link below</li> <li>● <a href="https://www.zillow.com">https://www.zillow.com</a></li> </ul>	<ul style="list-style-type: none"> <li>● Child's current home is actually further away from the fire zones according to <i>California Department of Forestry &amp; Fire Protection: Office of State Fire Marshal</i>, See PDFs                             <ul style="list-style-type: none"> <li>○ <a href="#">Los Angeles (current home)</a></li> <li>○ <a href="#">Encinitas (proposed home)</a></li> </ul> </li> </ul>

**HOUSING PROBLEMS (AFFORDABILITY, AVAILABILITY) IN LOS ANGELES**

		<b>Response</b>	<b>Live w/ Father</b>
38	The recent wildfires in Los Angeles have caused housing rental prices to soar. Those demanding rental housing include wealthy, displaced homeowners (who lost their homes).	<ul style="list-style-type: none"> <li>Respondent owns home with a 13 years left on mortgage at a fixed rate</li> <li>Child's current is safe and intact</li> </ul>	<ul style="list-style-type: none"> <li>Respondent owns home, renting does not apply</li> </ul>
39	I cannot afford to purchase property, so I will need to find a rental property for me and Killian. It's impossible for me to find a suitable rental property in Los Angeles that also guarantees consistency in rental price (landlords can raise the rent at any time).	See <b>Response</b> to Nos. 29 and 37 regarding housing for child	See <b>Response</b> to No. 29 regarding housing for child
40	My parents' spacious ADU in Encinitas offers long-term stability for Killian, in addition to consistent, no cost childcare, proximity to the beach, and excellent schools.	All issues petitioner has stated have been addressed in <b>Response</b> Nos. 3, 15, 24, and 25 and <b>Live w/ Father</b> 3, 15, 19 20, 24, 25, and 29	All issues petitioner has stated have been addressed in <b>Response</b> Nos. 3, 15, 24, and 25 and <b>Live w/ Father</b> 3, 15, 19 20, 24, 25, and 29

**IMPROVED QUALITY OF LIFE AND ENVIRONMENTAL HEALTH**

		<b>Response</b>	<b>Live w/ Father</b>
41	The long-term environmental impact of the recent wildfires is unknown.	<ul style="list-style-type: none"> <li>If the air quality is unbearable, petitioner and respondent, both, have options to stay with family until air quality improves</li> </ul> <p>Refer to <b>Response</b> No. 37 bullet 1 and <b>Live w/ Father</b> No. 37 regarding wildfires</p>	<ul style="list-style-type: none"> <li>If child is under respondent's responsibility and air quality is low, respondent and child will stay with child's uncle in Scottsdale, AZ temporarily</li> </ul>
42	Encinitas is coastal; it offers great air quality, low population density, a low crime rate, easy access to nature, abundance of recreational activities, and slower pace of life.	<p>Air quality has been addressed in <b>Response</b> and <b>Live w/ Father</b> No. 41</p> <ul style="list-style-type: none"> <li>A slower pace of life is strictly a desire the petitioner would like to have</li> </ul>	<ul style="list-style-type: none"> <li>Child will have access to nature, recreational activities as well as at his current location</li> </ul>

**ENCINITAS IS VERY CLOSE TO OUR CURRENT HOME IN VALLEY VILLAGE. KILLIAN IS ONLY TWO YEARS OLD; HE IS NOT TIED TO VALLEY VILLAGE**

		<b>Response</b>	<b>Live w/ Father</b>
43	Encinitas is only 107 miles from our current home located at 4730 Ben Ave., Unit 20, Valley Village, CA. 91607. The drive is less than two hours. See Exhibit B (Google Map printout).	<ul style="list-style-type: none"> <li>Distance from Valley Village to Encinitas is correct, however duration of commute is misleading</li> <li>Only scenario where time is less than 2 hours is for respondent to leave at 7am on a Sunday morning</li> <li>This commute can range up for 4 hours and 10 min</li> </ul>	See <b>Response</b> No. 44
44	Killian, who is only two years old, has no community ties to Valley Village. There is no downside whatsoever to Killian moving to Encinitas. Everything about the move is positive.	<ul style="list-style-type: none"> <li>This is positive for the petitioner as she no longer wants to live in Los Angeles</li> <li>There is a significant downside for child to move</li> <li>The child will:                             <ul style="list-style-type: none"> <li>Have limited time to his father</li> <li>Lose his own room and bathroom</li> <li>Go to a house 1/3 the size of his current house</li> <li>Change schools within three years</li> <li>Lose out on a significant better elementary school</li> <li>Have limited exposure to his father's side of family</li> </ul> </li> </ul>	See <b>Response</b> No. 44

**KILLIAN HAS SPENT SIGNIFICANT TIME IN ENCINITAS ALREADY. HIS SOCIAL NETWORK IS LIMITED; NOW IS A GREAT TIME TO RELOCATE.**

		<b>Response</b>	<b>Live w/ Father</b>
45	Effective March 30, 2025: Killian has already spent 7.5% (71 of 953 days) of his life in Encinitas at "Mae Mae's house" (which he recognizes as home).	<ul style="list-style-type: none"> <li>• The child is 2 years and 7 months old, he will say anything you tell him to say because he is learning to talk</li> <li>• The child also recognizes his bed at home, does not mean he always wants to sleep in his bed</li> <li>• The only reason child has spent a fair portion of time at his grandmother's is because her location is driving distance as respondent's family all live outside the state of California</li> <li>• In fact, child has been exposed to respondent's family 84 days of his life through family visits and Thanksgiving holidays</li> <li>• Respondent and child call child's grandfather every morning on the way to school so grandfather can develop a relationship</li> </ul>	See <b>Response</b> No. 45
46	12% of Killian's life (112 of 953 days) has been spent with Grandma Mary (Mae Mae).	<ul style="list-style-type: none"> <li>• The only reason why the child has spent 12% with the petitioner's grandmother is because -                             <ul style="list-style-type: none"> <li>◦ Location, Encinitas is obviously driving distance both petitioner and grandmother</li> <li>◦ All respondent's family lives outside the state of CA</li> <li>◦ Petitioner significantly decreased the amount of respondent's family from visiting from 2023 to 2024</li> <li>◦ And during these visits, petitioner created an uncomfortable environment for respondent's family members</li> <li>◦ Petitioner <b>would not allow</b> respondent to travel and stay alone with the child</li> <li>◦ In fact, the only time respondent was allowed to take the child for a night was just this past March to a family friend in Manhattan beach while respondent's cousin was visiting from Chicago; this was allowed because it was officially after the date of separation</li> <li>◦ Petitioner has taken child to grandmother's twice since the date of separation</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Child will no longer have the restrictions of the petitioner (unless court ordered) and will have the opportunity <b>to visit</b> (not move or be kidnapped) all respondents in the following areas:                             <ul style="list-style-type: none"> <li>◦ Phoenix, AZ</li> <li>◦ Flagstaff, AZ</li> <li>◦ Austin, TX</li> <li>◦ Chicago, IL</li> <li>◦ South Haven, MI</li> <li>◦ New York City, NY</li> <li>◦ Boston, MA</li> <li>◦ Washington D.C.</li> <li>◦ Toronto, ONT, Canada</li> </ul> </li> </ul>
47	I take Killian to Encinitas for a long weekend about once a month, as well as additional days and holiday breaks, and we stay there with DEV (45% of the time).	<ul style="list-style-type: none"> <li>• Again because Encinitas is drivable</li> <li>• Respondent only went to be with child and because of family obligations</li> </ul>	See <b>Response</b> No. 47
48	Killian is only two years old. His friendships are facilitated by his parents and he will continue to see his familiar friends during each parent's time.	Agree	See <b>Response</b> No. 48
49	Killian is at a great age to relocate and develop strong friendships within his new preschool class and through extracurricular activities	<ul style="list-style-type: none"> <li>• Child is already developing strong friendships through his pre-school and parent's friends with children</li> <li>• This is not a strong enough argument to justify leaving a larger, more comfortable home and a better elementary school</li> </ul>	See <b>Response</b> No. 49

**SUMMARY**

		<b>Response</b>	<b>Live w/ Father</b>
50	Encinitas guarantees that Killian will have adequate, stable housing; reliable no-cost childcare provided by Killian's grandparents, access to excellent schools and recreational activities; a safe community; and the drive from Encinitas to Valley Village is less than two hours.	See <b>Responses</b> and <b>Live w/ Father</b> No. 1 - 49 and 51	See <b>Responses</b> and <b>Live w/ Father</b> No. 1 - 49 and 51
51	For the foregoing reasons, it's in Killian's best interests to move with Mom to Encinitas.	<ul style="list-style-type: none"> <li>• This is NOT in the best interest of the child</li> <li>• This is only what the mother, not the child, wants</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Respondent has the resources, finances, family support, and motivation to provide for the child, and for those reasons is considering what's best for the child</b></li> </ul>