

2003

Gerald D. Lundahl v. Ruth M. Telford (Lundahl) : Answer to Appelle's Brief

Utah Court of Appeals

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Marlene Telford (Lundahl).

Unknown.

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Legal Brief, *Lundahl v. Lundahl*, No. 20030800 (Utah Court of Appeals, 2003).

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MARLENE TELFORD (LUNDAHL)
4139 NORTH DEVONSHIRE CIRCLE
PROVO, UTAH 84604

In Pro se

UTAH COURT OF APPEALS

In re Marriage of:

GERALD D. LUNDAHL, M.D
Plaintiff and Appellee,

vs.

RUTH M. TELFORD (LUNDAHL)
Respondent, Appellant

) **CASE NUMBER 20030800-CA**
)
)
) **APPELLANT'S REPLY BRIEF**
)
)
) **Fourth Judicial District Court**
)
) **Case No 784449259**
)
) **Judge Claudia Laycock**

ANSWER TO APPELLEE'S BRIEF

Marlene Telford (Lundahl)
4139 North Devonshire Circle
Provo, Utah 84604

UTAH COURT OF APPEALS
BRIEF

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DOCKET NO. 20030800-CA

FILED
UTAH APPELLATE COURTS
MAY 06 2004

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PROVO, UTAH 84604

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CASE NUMBER 20030800-CA

APPELLANT'S REPLY BRIEF

Fourth Judicial District Court

Case No 784449259

Judge Claudia Laycock

INTRODUCTION

Appellant, Marlene Telford (Lundahl) extends an apology to the Plaintiff's Counsel for inadvertently sending her Opening Brief with the Cover of the Brief in Grey. The "Blue" cover dated February 6, 2004 is the correct brief. In order that there is no confusion I am taking the liberty of listing all documents relative to this Appeal, that I have sent Mr. Drake, the Plaintiff's Counsel; Judge Claudia Laycock of the Fourth District Court, Utah County and the Utah Court of Appeals.

1) **Respondents Declaration of facts** pertaining to the current Utah Order, dated September 12, 2002 prior to notice of appeal

2) **Notice of Appeal** dated in September of 2003

3) **Docketing Statement** dated October 14, 2002 which included the following attachments: a) Utah Fourth District Courts ruling; b) Copies of recusals by the Fourth District Courts Judges due to the Plaintiff suing all judges, attorneys, service officials including Julee Robinson, Commissioner, of the Superior Court of Orange County, along with Mary Dahlberg, Deputy Attorney General of the state of California who had ruled

1 affirmatively for the Respondent. c) The Ninth Circuit Court of Appeals, denying the
2 *Plaintiff Subject Matter Jurisdiction*. d) Respondent's Motion to Strike Plaintiff's
3 Petition for Writ of Supersedeas of Utah orders. The Writ of Supersedeas was denied the
4 Plaintiff by the California Court of Appeals. e) Copy of Utah Docket mailed October 14,
5 2003.

6 4) **Designation of Record**, dated October 17, 2003. **Transcript of trial Court**
7 forwarded on to the Utah court of Appeal.

8 5) Filing of **Judgement Roll and Index** with the Utah Appellate Court, Dec. 30th
9 2003

10 6) **Opening Brief** dated February 6, 2004 with attachments (a Appellee's
11 declaration asking for Utah jurisdiction; (b two sheets of the Deposition of Appellee c)
12 Copies of two Letter Briefs from Barry Brooks Amicus Curiae and the Deputy Attorney
13 General of California, Mary Dahlberg. Two additional Brief's bound in Green 1) Amicus
14 Curiae, Brief by Barry Brooks assistant District Attorney General for the state of Texas,
15 who is an authority on UIFSA, having been appointed as an official observer; 2) copy of
16 Respondent Intervenor's Brief, Mary Dahlberg, Deputy Attorney General of California.

17 7) **Second Addendum to Opening Brief** (which contained a) California Appeals
18 Court Opinion, dated February 27, 2004; and b) a copy of the 1995 Utah Order with the
19 Honorable Senior Judge Guy Burningham presiding clearly stating that *Utah does have*
20 *subject Matter Jurisdiction of both the Appellant and Appellee*) c) The Ruling of the
21 Fourth District Court, the Honorable Judge Claudia Laycock, presiding, plus a copy of
22 the Utah Court order dated 22nd day of September which the Respondent is appealing.

23 8) **First Addendum to Opening Brief**. Attachments: Amicus Curiae; Amicus
24 Letter Brief; California Attorney General's Letter Brief. The California Attorney General
25 also submitted the following documents: a) Opposition to Appellants request for judicial
26 notice b) Respondent Intervenor's Brief c) Opposition to Plaintiff's writ of Supersedeas,
27
28

1 d) Motion for Judicial Notice, and a copy of the Orange County District Courts office
2 answer to Plaintiff's motion to vacate. (denied)

3 9) Copy of Orange County's response to Plaintiff on vacating Utah Orders
4 (Attachment #1)

5 The Respondent was sent *PRO SE PROCEDURES* by the Deputy Clerk of the
6 Appellate Court of Utah. The Respondent has attempted to comply with all the rules
7 necessary to properly appeal the order handed down by the Fourth District Court, Judge
8 Claudia Laycock presiding.

9 ARGUMENT

10 The California Order of Dissolution which was heard in Los Angeles County, City
11 of Norwalk, was transferred by the Plaintiff to Orange County, since he had established
12 residence there along with his new wife. (See P. 10, Respondent's Opening Brief citing
13 2-4 Plaintiffs complaint Cite 10-24 of same complaint) The Plaintiff's Counsel is wrong
14 when he states the Respondent did not properly cite authorities in her Opening Brief)

15 The Plaintiff's argument is once again flawed. There was no such thing as
16 "Continuing exclusive jurisdiction" in 1977-78. All Divorce matters at the time were
17 under the authority of RURESA. (See pp. 6, 7, 8, of Respondents Intervenor—Deputy
18 Attorney General of California. Brief) Green cover.

19 1. The Utah Orders were issued *before* enactment of UIFSA AND ARE VALID,
20 ENFORCEABLE ORDERS.

21 2. The Revised Uniform Reciprocal Enforcement of Support Act (RURESA)
22 provided that an order made by a state with personal jurisdiction could not nullify and
23 would not be nullified by an order issued by another state. The Appellee submitted to the
24 personal jurisdiction of the Utah courts by filing an action in this state to enforce the
25 California dissolution. (Cite p.10 of Respondent's Opening Brief)

26 3. As a matter of convenience the Respondent has prepared a partial listing of
27
28

1 actions occurring in both the California as well as the Utah courts. (See **attachment # 2**,
2 Partial listings) Perhaps another review of the Utah Court Docket is applicable where the
3 Plaintiff is concerned)

4 4. UIFSA provides that when there are multiple orders, the longer statute applies.
5 (Fam Code, Section 4953, subd. (b)). In discussing retroactive application of UIFSA, the
6 court in Jacoby consistently refers to the concept that no “substantive rights” are affected.
7 (*Jacoby, supra*, 975 P.2d at p. 943). Application of UIFSA in that case **did not** act to
8 invalidate any of the multiple orders. It was a simple choice of law decision. There is no
9 provision in UIFSA which would act to retroactively *nullify* **valid** orders issued *prior* to
10 UIFSA’s enactment. (cite **P.9** Respondent Intervenor, California AG Brief) Green cover.

11 5. Again Counsel for the Plaintiff is in error. Utah has **never** attempted to modify
12 any California Order. The Respondent’s (2) appearances in California was to challenge
13 the California Court on the premise that litigation was pending and being heard in the
14 Utah Courts. All Utah orders are valid on their own merit, and were filed independently.
15 (See **P 34 , 35** of Respondent’s Opening Brief)

16 6. Under RURESA Utah has acknowledged “ The remedies herein provided are in
17 addition to and not in substitution for any other remedies” (See Respondents Opening
18 Brief **p.39**)

19 7. Regarding the current Utah order handed down by Judge Claudia Laycock, the
20 Respondent would refer to the California Opinion of the Appellate Court, **P 6**. “ - - - On
21 Lundahl’s claim that the Utah orders were void for lack of subject matter jurisdiction, the
22 California Appeals court specifically found: “ *The Utah Court had jurisdiction to make*
23 *the orders because there was concurrent jurisdiction in both Utah and California.*” The
24 court confirmed registration of each of the Utah orders and ordered “all stays on
25 enforcement **lifted**.” A thorough reading of the California Opinion which is now part of
26 the Utah Appeal, might be helpful to the Plaintiff since all the issues mentioned in the
27
28

1 Plaintiff's reply to the Respondent's Opening Brief is addressed in the California Appeals
2 Court, District 4, Division 3, "Opinion."

3 8. Both the Respondent and the Plaintiff have submitted to the California Superior
4 Court of Orange County what is allegedly owed the Respondent. (See summation of
5 monies due the Respondent according to the California Child Support Services
6 ~~Attachment #3~~)

7 9. In the Plaintiff's Reply (page 11), a re-statement is necessary. The Respondent
8 has NEVER asserted that Gerald Lundahl lived in Utah. However, as stated in a previous
9 motion the Plaintiff was served at the address 415 Bearcat Drive, Salt Lake City, since he
10 was attending a "self-help" Seminar called "Impact" The information of where the
11 Plaintiff was, was supplied by one of our 12 children.

12 JURISDICTION

13 10. On page 10 of the "Opinion" the California Appeals Court very clearly
14 explains that there is no *Exclusive Jurisdiction* mentioned in the Original Dissolution
15 Order. . . . " Because the issue was not raised, our opinion did not decide that jurisdiction
16 in California precluded jurisdiction in Utah (San Diego Gas & Electric v. Superior Court
17 (1996) 13 Cal.4th 893, 943 ["[c]ases are not authority, of course, for issues not raised nor
18 resolved."

19 **NO EXCLUSIVE JURISDICTION UNDER RURESA**

20 11. The California Appeals court in its "Opinion" states that ALL Utah orders
21 were issued under the statutes of RURESA. . . . "Contrary to Lundahl's assertion, both
22 Utah and California expressly recognize that RURESA sister states may issue
23 independent support orders for differing amounts without having to modify, supersede or
24 nullify each other's orders") See, e.g. Kammerzell v. Kammerzell (See P. 11 for
25 additional information on the Appeal Courts Opinion of the Kammerzell case). Also if the
26 Plaintiff will read the "footnotes" in the California "Opinion" it might help him to
27
28

1 understand why the California Appeals Court ruled as they did.

2 Based on the above statues under RURESA it is the opinion of the Respondent
3 that the Plaintiff has a “weak” argument for continuing, exclusive, jurisdiction.

4 1) It was the Plaintiff who “forum Shopped.” (See Respondent’s Opening Brief, P
5 21).

6 2) Under RURESA a court cannot modify or nullify another courts order.

7 3) . . . (Opinion p.23) . . **“On the limited record before us, we fail to see how the**
8 **issue of Utah Subject Matter jurisdiction was not res judicata**

9 Rather than repeating what already has been alleged by the Respondent, all I can
10 do is encourage the Plaintiff’s Counsel to seriously read the Respondents Opening Brief,
11 the California Appeals Court Opinion and additional Briefs by Amicus Curiae and
12 California Attorney General’s briefs submitted to the California Court of Appeals where
13 nearly all issues have been addressed, and not only in the Utah Court venue but through
14 the California “staying” of orders on the premise that only Utah has jurisdiction. (See pp
15 20 and 21. Respondent’s Opening Brief).

16 Moreover, another review of the Amicus Brief, The California Deputy Attorney
17 General’s Brief *including* Letter Briefs from both parties as requested by the California
18 Appeals Court, along with a serious review of the size of the Utah Docket should support
19 the argument that Utah and California have concurrent jurisdiction as stipulated by *the*
20 *Superior Court of the State of California for the County of Orange Amended findings and*
21 *Order after hearing on Petitioners objection to Registration heard May 3, 2002.* (See
22 copy of the California order added as an attachment in Respondent’s Notice of Appeal).
23 The Plaintiff appealed the California Order but failed in his argument, thereby activating
24 the California Appeals Court, District 4, Division 3, supporting the decision of the
25 California trial court thereby ruling in favor of the Respondent.

26 In conclusion all parties concerned with this case might consider what the
27
28

1 California Opinion stated: “Concisely stated, under RURESA: [N]ew support orders do
2 not nullify, modify, or supersede the original support decree, but instead provide an
3 additional, supplementary or cumulative remedy.”

4 5 CONCLUSION

6 The Utah Trial Courts decision stating that Utah did not have subject Matter jurisdiction
7 should be *reversed*. This decision had already been litigated in 1995 before the Honorable
8 Judge Guy Burningham presiding. **The Plaintiff never appealed the 1995 order.** But
9 now, *nine years later*, the Plaintiff is attempting to reverse the Trial court’s Order. Never
10 once in the years from 1978 until now has a Utah Trial Court reversed the same court’s
11 decision nor ordered the transfer of any motions filed in the Utah courts to the California
12 courts. Since Judge Laycock is not an appellate Judge, I don’t see where her authority
13 lies by reversing another Judges Order in the same court, concerning the *same* issues.
14 Additionally, it is my understanding that an appeal on the decision of the trial court must
15 be filed within a *40 day period*. (Emphasis) Would the Utah Appeals Court take judicial
16 Notice of the Respondent’s Motion to Set aside ruling and Objection to Order filed with
17 the Utah Trial Court and included with the record sent up to the Utah Court of Appeals.
18 In this motion there were the following attachments germane to the current matters before
19 the Utah Court of Appeals.: (This Motion dated in September, 2003 is part of the record
20 sent up to Utah Court of Appeals) The following documents were part of attachment to
21 this motion.

22
23 `1) Memorandum, United States Court of Appeal, Ninth Circuit, Central Division,
24 State of California. The Plaintiff’s motion was denied.

25 2) Supplemental Affidavit, Gerald Lundahl, Plaintiff

26 3) Copy of the Current California Order dated May 3, 2002
27
28

- 1 4) Copy of California Transcript
- 2 5) Respondents Supplemental Declaration, California Superior Court, 3/29/2002
- 3 6) Utah Attorney General: "Utah has jurisdiction".
- 4 7) Plaintiff's request for Utah jurisdiction
- 5 8) Plaintiff's initial intent to file motion before the Utah Supreme Court
- 6 9) Plaintiff's admission to "forum shopping."
- 7 10) California Court "stays" Plaintiffs motion—Back to Utah jurisdiction
- 8 11) Plaintiff's Utah Affidavit: Admits to Utah Court about his deception
- 9 12) Copy of UIFSA
- 10 13) Copy of Respondent's Opening Brief, Court of Appeals, state of California
- 11 14) Copy of Table of Authorities which was part of motion in the Court of
- 12 Appeals in the state of California.
- 13 15) Affidavit of Judge Guy Burningham, Fourth District Court, Utah County
- 14 where he asserts before the California Tribunal that Utah has jurisdiction.
- 15 16) Respondent's Memorandum, December 18, 2001----Quotes Plaintiff's
- 16 *allegation* that California has neither Subject Matter Jurisdiction nor personal
- 17 jurisdiction of Plaintiff (See pages 3-10)

18
19 In the footnotes of the current Utah Order, p 7, it states:

20
21 "The Court has carefully reviewed the 3-volume file, but has found neither
22 a ruling nor an order in which subject matter jurisdiction was explicitly
23 ruled upon by any of the previous judges. If such a ruling was made on the
24 record, respondent would need to provide a transcript of such hearing for
25 this courts consideration".

26 Somehow Judge Claudia Laycock missed the 1995 order. The Respondent has
27
28

1 since gone to the Provo Utah Courthouse and the 1995 Order is in the Utah Courts files.
2 If the Trial Court desires, the Respondent will attempt to get a transcript of that hearing,
3 providing, of course written transcripts were authorized or available at that time. There is
4 a *certified* order that can be made available on the 1995 decision.

5 Respectfully

6 *if (Marlene Telford / Lundahl)*
7 Marlene Telford (Lundahl) ✓
8 4139 North Devonshire Circle
Provo, Utah 84604

Date

May 4, 2004

9 In pro se

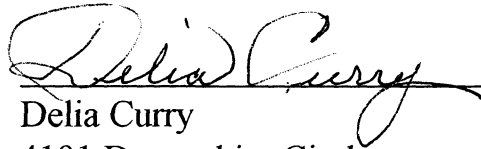
PROOF OF SERVICE

I am over the age of eighteen and not a party to the within action.

On May 4, 2004 I personally mailed the foregoing document **Respondent's Reply to Plaintiff's/ Appellee Brief** on the interested parties in this action.

Executed on May 4, 2004 at Provo, Utah.

I declare under penalty of perjury under the laws of the State of Utah that the foregoing is true and correct.

A handwritten signature in cursive script, reading "Delia Curry", is written over a horizontal line.

Delia Curry
4191 Devonshire Circle
Provo, Utah

SERVICE LIST

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Petitioner's Utah Counsel

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Deputy Attorney General
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Attorney for Intervenor
(Orange County for Respondent)

Appellate Court
450 South State
Salt Lake City Utah, 84114

[8 copies]

Barry J. Brooks
3500 Cassava Drive
Austin, TX 78746-6691

Amicus Brief, Letter Brief

Judge Claudia Laycock
Fourth District Court, Utah County
125 North, 100 West
Provo, Utah, 84601

Partial Summary of actions on Domestic Issues.

9/15/77 **Dissolution of Marriage: Petitioner, Gerald D. Lundahl; Respondent, Ruth M. Lundahl. County of Los Angeles; Judge Ralph A Biggerstaff presided. In less than a year Petitioner (plaintiff) files his first OSC in Utah thereby surrendering to Utah Jurisdiction voluntarily. Years of litigation follow.**

<u>Date</u>	<u>Action</u>	<u>Complaint</u>	<u>Party</u>	<u>Counsel</u>
<u>Utah Proceedings:</u>				
6/7/78	OSC	Custody/visitation	<i>Plaintiff</i>	Wooton
6/28/78	Counter/claim		Defendant	Peterson
6/78	<u>Findings of Fact</u>		Court	
7/9/78	OSC	Custody (baby)	<i>Plaintiff</i>	Noal Wooton
7/20/79	Minute Entry		Court	
9/10/79	OSC	Counter/claim	Defendant	Don Peterson
28/4/80	OSC	Summary Judgement	<i>Plaintiff</i>	Noel Wooton
6/20/80	Stipulation		Both	
<u>7/7/80</u>	<u>Order</u>	<u>Stipulation for defendant</u>	<u>Both</u>	<u>Wooton/ Peterson</u>
----80	Stipulation	Child support stays same	<i>Plaintiff</i>	Wooton
<u>4/28/80</u>	<u>Order</u>	<u>Plaintiffs request denied</u>		
<u>7/7/80</u>	<u>Order</u>	<u>Increase of support</u>	<u>Court</u>	
30/4/81	OSC	Change of Circumstances	Defendant	Michael Esplin
<u>8/4/81</u>	<u>Order</u>	<u>Deligt support/Plaint</u>	<u>Defendant</u>	<u>Esplin</u>
<u>11/27/81</u>	<u>Order</u>	<u>Support increase</u>	<u>Court</u>	
3/4/82	Cont/court	Custody/Plaintiff	Defendant	Esplin
4/29/82	Stipulation	Support payments fixed	Both	Esplin/ Jensen
6/27/83	OSC	Family Support	Defendant	Esplin
<u>7/7/83</u>	<u>Order</u>	<u>Fixed amt support to Def</u>	<u>Court</u>	
7/6/83	OSC/	<i>Petition/Modify custody</i>	<i>Plaintiff</i>	Moody
<u>California Proceedings:</u>				
7/18/83	OSC/Calif	<i>Petition/Modify custody</i>	<i>Plaintiff</i>	Wishart
8/12/83	Order/Calif	<u>Children to Utah*</u>	Defendant	Hosp

***California court declares that only Utah has jurisdiction.**

Honorable Lee. B. Ragins. Judge pro tem Presided

Utah Proceedings:

3/15/84	OSC	Petition to modify	<i>Plaintiff</i>	Moody
---------	-----	--------------------	------------------	-------

4/19/84	Order	<i>Sup./Arrearage/fixed visitation(later verified in Calif</i>
11/6/87)		
9/27/84	Order	<u>Increase of child support</u> Court
11/3/84	Stipulation	Arrearage adjusted

California Proceedings: *(Defendant living in California for nine month period)*

8/3/87	OSC/Order ¹	<i>Defendant living in Calif</i>	Defendant	Sandor/Wishart
11/16/87	Order	Custody stands	Defendant	Judge Fassel *
4/29/88	OSC	Visitation “	<i>Plaintiff</i>	Wishart/ Smith
9/21/88	OSC	Custody of Kassi	<i>Plaintiff</i>	Wishart/Vogl

Utah Proceedings:

1990	<u>OSC/Order</u>	Fixed Support	Defendant	Esplin
		Plaintiff stipulates to \$3000/mo support.²		
1/4/91	OSC	Petition to modify	Defendant	Esplin
2/5/91	OSC	Counter Claim	<i>Plaintiff</i>	Moody
4/24/91	OCS	Fixed/ family support	Defendant	Esplin
8/20/91	OSC	Counter claim	<i>Plaintiff</i>	Moody
8/24/91	Order	Arrearages(Def)	Court	
4/8/92	OSC	Petition to modify	<i>Plaintiff</i>	Moody
9/23/92		<i>Withdrawal of Counsel</i>		
1/6/93	Court Notice	<i>Plaintiff</i> to appoint counsel or appear in person		
1/25/93	Court	Notice of Settlement Conference		
3/10/93	Order	Judgement filed and executed in California (Defendant)		
4/29/93	Court	Pre-trial Scheduling Conference		
1/04/94	Order	<i>Plaintiff</i> to provide witnesses (<u>Contempt of Court</u>)		
7/28/94	Order	<i>Plaintiff</i> sanctioned by court		
11/14/94	Court ruling	Ignored by <i>plaintiff</i> (<u>Contempt of Court</u>)		
12/01/94	Court	Pre-trial conference set (counsel for both parties present)		
1/03/95		Withdrawal of counsel <i>Plaintiff</i>		

¹ *Heard by Judge Rylarsdam. Plaintiff declares he sold practice--lives on salary of \$80,000 annually. Ruling based on this. Latter evidence surfaced which clearly indicated Plaintiff did not sell medical practice. Documents in hand showing he kept his medical practice-- doing annual volume of over \$500,000.00. Defendant did not have money to relitigate. Also, the declaration by Plaintiff submitted to court at this time states "He would just as soon litigate in Utah."*

²*Plaintiff unilaterally stops pmt of support checks-reduces family support*

1/27/95	Court/findings	Amended decree forthcoming	
1/20/95	<u>Motion/Calif</u>	Utah has jurisdiction	Defendant

On July 8, 1994 an OSC was filed in California by the Plaintiff while proceedings were still in motion in Utah. Note that on August 18, the day the defendant appeared pro per in California the Plaintiffs counsel was filing another motion in Utah

THE REMAINDER OF UTAH COURT ACTIVITY IS SHOWN ON THE UTAH
DOCKET

ASOF: 01/28/2003 (6B09)
PROCESSED: 01/28/2003 07:37P
PROGRAM: NFB720

Orange County
Child Support Services
ACCOUNT SUMMARY TOTAL REPORT
7% BEFORE 1983 and 10% SINCE 1983

PAGE: 1
REPORT: NFB720-02

NCP NAME: GERALD D LUNDAHL
CASE #: 30-304.540.512
COURT ORDER #: 01FL007984

WORKER ID: 29F251

FROM TRANSACTION DATE: 02/01/1995
TO TRANSACTION DATE: 01/28/2003

HISTORY REPORT TOTALS ----->

ASSIGNED				UNASSIGNED			
PRINCPL:	125,091.72	INT:	.00	PRINCPL:	53,472.50	INT:	17,685.40
PAID:	.00	PAID:	.00	PAID:	35,336.46	PAID:	2,944.97
<hr/>				<hr/>			
DUE:	125,091.72	DUE:	.00	DUE:	18,136.04	DUE:	14,740.43
 TOTAL ARREARS DUE + INTEREST:				157,968.19			

SUMMARIZED ACCOUNT DUE (PAC)
BY AID CATEGORY ---->

UNASSIGNED

*** FINAL ACCOUNT DUE ***

PRINCPL:	147,227.76	INT:	14,740.43	TOTAL PRINCPL DUE + INTEREST:	161,968.19
----------	------------	------	-----------	-------------------------------	------------

ASOF: 01/28/2003 (6B09)
PROCESSED: 01/28/2003 07:37P
PROGRAM: NFB720

Orange County
Child Support Services
HISTORY SUMMARY REPORT
7% BEFORE 1983 and 10% SINCE 1983

PAGE:
REPORT: NFB720-0

NCP NAME: GERALD D LUNDAHL

WORKER ID: 29F251

CASE #: 30-304.540.512

FROM TRANSACTION DATE: 02/01/1995
TO TRANSACTION DATE: 01/28/2003

COURT ORDER #: 01FL007984

TXN		EFF	TXN	CHARGE	CREDIT	PMT	CURR	PRIN	PRIN	INT	INT	CURR	PRIN	UNASSIGNED	INT	TOTAL
DATE		DATE	CODE	AMT	AMT	SRC	OBLIG	PAID	BAL	PAID	BAL	OBLIG	PAID	BAL	PAID	BALANCE
02/01/95		09/01/98		TERMS:	SPOUSAL	JUDGMENT	MONTH	AMT:	1,000.00	FREQ:	MN	LUMP	SUM	AMT:	62,991.72	
02/01/95	02/01/95	02/01/95	CHG	86300.00					124200.00		.00			62100.00	.00	186,300.00
09/01/98	09/01/98	09/01/98	CHG	88975.16					250183.44		.00			125091.72	.00	375,275.16
10/18/01	09/01/98	10/01/98	PMT		500.00	RE			250183.44		.00		500.00	124591.72	.00	374,775.16
10/18/01	10/01/98	10/01/98	PMT		500.00	RE			250183.44		.00		500.00	124091.72	.00	374,275.16
10/18/01	11/01/98	10/01/98	PMT		500.00	RE			250183.44		.00		500.00	123591.72	.00	373,775.16
10/18/01	12/01/98	10/01/98	PMT		500.00	RE			250183.44		.00		500.00	123091.72	.00	373,275.16
10/18/01	01/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	122591.72	.00	372,775.16
10/18/01	02/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	122091.72	.00	372,275.16
10/18/01	03/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	121591.72	.00	371,775.16
10/18/01	04/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	121091.72	.00	371,275.16
10/18/01	05/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	120591.72	.00	370,775.16
10/18/01	06/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	120091.72	.00	370,275.16
10/18/01	07/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	119591.72	.00	369,775.16
10/18/01	08/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	119091.72	.00	369,275.16
10/18/01	09/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	118591.72	.00	368,775.16
10/18/01	10/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	118091.72	.00	368,275.16
10/18/01	11/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	117591.72	.00	367,775.16
10/18/01	12/01/99	10/01/99	PMT		500.00	RE			250183.44		.00		500.00	117091.72	.00	367,275.16
10/18/01	01/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	116591.72	.00	366,775.16
10/18/01	02/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	116091.72	.00	366,275.16
10/18/01	03/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	115591.72	.00	365,775.16
10/18/01	04/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	115091.72	.00	365,275.16
10/18/01	05/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	114591.72	.00	364,775.16
10/18/01	06/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	114091.72	.00	364,275.16
10/18/01	07/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	113591.72	.00	363,775.16
10/18/01	08/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	113091.72	.00	363,275.16
10/18/01	09/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	112591.72	.00	362,775.16
10/18/01	10/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	112091.72	.00	362,275.16
10/18/01	11/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	111591.72	.00	361,775.16
10/18/01	12/01/00	10/01/00	PMT		500.00	RE			250183.44		.00		500.00	111091.72	.00	361,275.16
10/18/01	01/01/01	10/01/01	PMT		500.00	RE			250183.44		.00		500.00	110591.72	.00	360,775.16
10/18/01	02/01/01	10/01/01	PMT		500.00	RE			250183.44		.00		500.00	110091.72	.00	360,275.16
10/18/01	03/01/01	10/01/01	PMT		500.00	RE			250183.44		.00		500.00	109591.72	.00	359,775.16
10/18/01	04/01/01	10/01/01	PMT		500.00	RE			250183.44		.00		500.00	109091.72	.00	359,275.16
10/18/01	05/01/01	10/01/01	PMT		500.00	RE			250183.44		.00		500.00	108591.72	.00	358,775.16
10/18/01	06/01/01	10/01/01	PMT		500.00	RE			250183.44		.00		500.00	108091.72	.00	358,275.16
10/18/01	07/01/01	10/01/01	PMT		500.00	RE			250183.44		.00		500.00	107591.72	.00	357,775.16

TXN CODE: ADJ = ADJUSTMENT, TEP = TERMINATED PAC ADJUSTMENT, CHG = OB/AR ASSESSMENT, INT = ACCRUE INTEREST, PMT = ALLOCATIONS

TXN DATE	EFF DATE	TXN CODE	CHARGE AMT	CREDIT AMT	PMT SRC	CURR OBLIG	PRIN PAID	ASSIGNED			CURR OBLIG	PRIN PAID	UNASSIGNED			TOTAL BALANCE
								PRIN BAL	INT PAID	INT BAL			PRIN BAL	INT PAID	INT BAL	
10/18/01	08/01/01	PMT		500.00	RE			250183.44		.00		500.00	107091.72		.00	357,275.16
03/31/02	04/01/02	CHG	2235.00					250183.44		.00	2235.00		109326.72		.00	359,510.16
04/26/02	04/26/02	ADJ		56078.44				125091.72		.00			78340.00		.00	203,431.72
04/30/02	04/30/02	CHG	2235.00					125091.72		.00	2235.00		80575.00		.00	205,666.72
05/31/02	05/31/02	CHG	2235.00					125091.72		.00	2235.00		82810.00		.00	207,901.72
06/06/02	05/13/02	PMT		1100.00	RE			125091.72		.00		1100.00	81710.00		.00	206,801.72
06/06/02	05/28/02	PMT		1135.00	RE			125091.72		.00		1135.00	80575.00		.00	205,666.72
06/11/02	06/11/02	PMT		2235.00	RE			125091.72		.00		2235.00	78340.00		.00	203,431.72
06/26/02	10/01/01	TERMS CHANGE:														
				SPOUSAL JUDGMEN MONTH AMT:				.00	FREQ:	LUMP SUM AMT:	62,991.72					
				SPOUSAL SUPPORT MONTH AMT:				2,235.00	FREQ:	MN LUMP SUM AMT:	.00					
06/26/02	10/01/01	CHG	2235.00					125091.72		.00	2235.00		80575.00		.00	205,666.72
06/26/02	10/31/01	CHG	2235.00					125091.72		.00	2235.00		82810.00		.00	207,901.72
06/26/02	11/30/01	INT	18.62					125091.72		.00			82810.00	18.62		207,920.34
06/26/02	11/30/01	CHG	2235.00					125091.72		.00	2235.00		85045.00		18.62	210,155.34
06/26/02	12/31/01	INT	37.25					125091.72		.00			85045.00	55.87		210,192.59
06/26/02	12/31/01	CHG	2235.00					125091.72		.00	2235.00		87280.00	55.87		212,427.59
06/26/02	01/31/02	INT	55.87					125091.72		.00			87280.00	111.74		212,483.46
06/26/02	01/31/02	CHG	2235.00					125091.72		.00	2235.00		89515.00	111.74		214,718.46
06/26/02	02/28/02	INT	74.50					125091.72		.00			89515.00	186.24		214,792.96
06/26/02	02/28/02	CHG	2235.00					125091.72		.00	2235.00		91750.00	186.24		217,027.96
06/26/02	03/31/02	INT	618.05					125091.72		.00			91750.00	804.29		217,646.01
06/26/02	03/31/02	CHG	2235.00					125091.72		.00	2235.00		93985.00	804.29		219,881.01
06/26/02	04/30/02	INT	636.68					125091.72		.00			93985.00	1440.97		220,517.69
06/26/02	04/30/02	CHG	2235.00					125091.72		.00	2235.00		96220.00	1440.97		222,752.69
06/26/02	05/31/02	INT	655.30					125091.72		.00			96220.00	2096.27		223,407.99
06/26/02	05/31/02	CHG	2235.00					125091.72		.00	2235.00		98455.00	2096.27		225,642.99
06/27/02	06/27/02	ADJ	7142.19	83097.50				125091.72		.00			15357.50	9238.46		149,687.68
06/30/02	06/30/02	INT	1203.74					125091.72		.00			15357.50	10442.20		150,891.42
06/30/02	06/30/02	CHG	2235.00					125091.72		.00	2235.00		17592.50	10442.20		153,126.42
07/02/02	07/02/02	PMT		1135.00	RE			125091.72		.00		1135.00	16457.50		10442.20	151,991.42
07/17/02	07/15/02	PMT		1100.00	RE			125091.72		.00		1100.00	15357.50		10442.20	150,891.42
07/31/02	07/31/02	INT	1203.74					125091.72		.00			15357.50	11645.94		152,095.16
07/31/02	07/31/02	CHG	2235.00					125091.72		.00	2235.00		17592.50	11645.94		154,330.16
08/02/02	07/26/02	PMT		291.89	WG			125091.72		.00			17592.50	291.89	11354.05	154,038.27
08/02/02	07/26/02	ADJ	.18					125091.72		.00			17592.50		11353.87	154,038.09
08/07/02	08/07/02	PMT		1100.00	RE			125091.72		.00		1100.00	16492.50		11353.87	152,938.09
08/09/02	08/02/02	PMT		291.89	WG			125091.72		.00		291.89	16200.61		11353.87	152,646.20
08/13/02	08/12/02	INT	481.49					125091.72		.00			16200.61	11835.36		153,127.69
08/13/02	08/12/02	PMT		1100.00	RE			125091.72		.00		843.11	15357.50	256.89	11578.47	152,027.69
08/16/02	08/09/02	PMT		291.88	WG			125091.72		.00			15357.50	291.88	11286.59	151,735.81
08/22/02	08/16/02	INT	160.50					125091.72		.00			15357.50		11447.09	151,896.31
08/22/02	08/16/02	PMT		291.89	WG			125091.72		.00			15357.50	291.89	11155.20	151,604.42
08/26/02	08/12/02	PMT	1100.00		RE			125091.72		.00		843.11	16200.61	256.89	11412.09	152,704.42
08/28/02	08/23/02	PMT		291.89	WG			125091.72		.00		291.89	15908.72		11412.09	152,412.53
08/31/02	08/31/02	INT	561.75					125091.72		.00			15908.72		11973.84	152,974.28
08/31/02	08/31/02	CHG	2235.00					125091.72		.00	2235.00		18143.72		11973.84	155,209.28

ASOF: 01/28/2003 (6B09)
PROCESSED: 01/28/2003 07:37P
PROGRAM: NFB720

Orange County
Child Support Services
HISTORY SUMMARY REPORT
7% BEFORE 1983 and 10% SINCE 1983

NCP NAME: GERALD D LUNDAHL
CASE #: 30-304.540.512
COURT ORDER #: 01FL007984

WORKER ID: 29F251

FROM TRANSACTION DATE: 02/01/1995
TO TRANSACTION DATE: 01/28/2003

----- ASSIGNED -----																
TXN	EFF	TXN	CHARGE	CREDIT	PMT	CURR	PRIN	PRIN	INT	INT	CURR	PRIN	UNASSIGNED -----			
DATE	DATE	CODE	AMT	AMT	SRC	OBLIG	PAID	BAL	PAID	BAL	OBLIG	PAID	PRIN	INT	INT	TOTAL
													BAL	PAID	BAL	BALANCE
09/11/02	09/06/02	PMT		266.89	WG			125091.72		.00		266.89	17876.83		11973.84	154,942.39
09/13/02	08/30/02	PMT		291.89	WG			125091.72		.00		291.89	17584.94		11973.84	154,650.50
09/18/02	09/13/02	PMT		291.89	WG			125091.72		.00		291.89	17293.05		11973.84	154,358.61
09/25/02	09/25/02	PMT		1000.00	RE			125091.72		.00		1000.00	16293.05		11973.84	153,358.61
09/30/02	09/20/02	PMT		291.89	WG			125091.72		.00		291.89	16001.16		11973.84	153,066.72
09/30/02	09/30/02	INT	1205.90					125091.72		.00			16001.16		13179.74	154,272.62
09/30/02	09/30/02	CHG	2235.00					125091.72		.00	2235.00		18236.16		13179.74	156,507.62
10/04/02	09/27/02	PMT		291.89	WG			125091.72		.00		291.89	17944.27		13179.74	156,215.73
10/09/02	10/04/02	PMT		291.89	WG			125091.72		.00		291.89	17652.38		13179.74	155,923.84
10/18/02	10/11/02	PMT		291.89	WG			125091.72		.00		291.89	17360.49		13179.74	155,631.95
10/22/02	10/18/02	PMT		291.89	WG			125091.72		.00		291.89	17068.60		13179.74	155,340.06
10/30/02	10/25/02	PMT		291.89	WG			125091.72		.00		291.89	16776.71		13179.74	155,048.17
10/31/02	10/31/02	INT	1206.67					125091.72		.00			16776.71		14386.41	156,254.84
10/31/02	10/31/02	CHG	2235.00					125091.72		.00	2235.00		19011.71		14386.41	158,489.84
11/07/02	11/01/02	PMT		291.88	WG			125091.72		.00		291.88	18719.83		14386.41	158,197.96
11/14/02	11/08/02	PMT		291.89	WG			125091.72		.00		291.89	18427.94		14386.41	157,906.07
11/20/02	07/19/02	PMT		291.89	WG			125091.72		.00			18427.94	291.89	14094.52	157,614.18
11/20/02	07/19/02	ADJ	7.74					125091.72		.00			18427.94		14086.78	157,606.44
11/20/02	11/20/02	PMT		483.66	RE			125091.72		.00		483.66	17944.28		14086.78	157,122.78
11/20/02	11/20/02	PMT		775.55	RE			125091.72		.00		775.55	17168.73		14086.78	156,347.23
11/21/02	11/15/02	PMT		291.89	WG			125091.72		.00		291.89	16876.84		14086.78	156,055.34
11/26/02	11/22/02	INT	891.42					125091.72		.00			16876.84		14978.20	156,946.76
11/26/02	11/22/02	PMT		291.89	WG			125091.72		.00		100.13	16776.71	191.76	14786.44	156,654.87
11/27/02	11/11/02	PMT		1216.00	FT			125091.72		.00			16776.71	1216.00	13570.44	155,438.87
11/30/02	11/30/02	INT	324.15					125091.72		.00			16776.71		13894.59	155,763.02
11/30/02	11/30/02	CHG	2235.00					125091.72		.00	2235.00		19011.71		13894.59	157,998.02
12/04/02	11/29/02	PMT		291.89	WG			125091.72		.00			19011.71	291.89	13602.70	157,706.13
12/04/02	11/29/02	ADJ	.07					125091.72		.00			19011.71		13602.63	157,706.06
12/12/02	12/06/02	PMT		291.89	WG			125091.72		.00		291.89	18719.82		13602.63	157,414.17
12/18/02	12/13/02	PMT		291.89	WG			125091.72		.00		291.89	18427.93		13602.63	157,122.28
12/26/02	12/26/02	PMT		1145.21	RE			125091.72		.00		1145.21	17282.72		13602.63	155,977.07
12/31/02	12/20/02	PMT		291.89	WG			125091.72		.00		291.89	16990.83		13602.63	155,685.18
12/31/02	12/27/02	INT	1094.02					125091.72		.00			16990.83		14696.65	156,779.20
12/31/02	12/27/02	PMT		291.89	WG			125091.72		.00		214.12	16776.71	77.77	14618.88	156,487.31
12/31/02	12/31/02	INT	121.55					125091.72		.00			16776.71		14740.43	156,608.86
12/31/02	12/31/02	CHG	2235.00					125091.72		.00	2235.00		19011.71		14740.43	158,843.86
01/08/03	01/03/03	PMT		291.89	WG			125091.72		.00		291.89	18719.82		14740.43	158,551.97