

STATE OF MINNESOTA

IN DISTRICT COURT

COUNTY OF BLUE EARTH

FIFTH JUDICIAL DISTRICT

FAMILY COURT DIVISION

Case Type: Dissolution with Children

Court File No.: 07-FA-17-3863

In Re the Marriage of:

Andrew Lowe Billett,

Petitioner,

**ANDREW BILLETT'S SUPPLEMENTAL
AFFIDAVIT IN RESPONSE TO
RESPONDENT'S 3/24 AFFIDAVIT FOR
ATTORNEY'S FEES**

and

Ruth Anne Billett,
n/k/a RuthAnne Maihan Billett
Respondent.

COMES NOW Andrew Lowe Billett, having been duly sworn, upon oath, respectfully states and alleges as follows:

1. I am giving this Supplemental Affidavit in response to Respondent's Affidavit Request for Attorney's Fees in this proceeding.
2. I ask that the Court deny Respondent's request for attorney's fees.

RUTHANNE'S REQUEST FOR ATTORNEY'S FEES

3. Respondent has the means to pay her own estimated attorney's fees in this proceeding.
4. Despite Respondent's deficient discovery response, she had gross pay of at least \$74,984 in 2022. **(SEE EXHIBIT 13)**. This amount could be higher due to an annual increase in pay but due to her deficient discovery response it is unknown if her income is higher for 2023. However, it is known that her annual pay was at least \$74,984 in 2022.
5. According to ZipRecruiter, the average salary in Arizona is \$52,774. **(SEE EXHIBIT 14)**.

6. At \$74,984 per year, Respondent's salary is significantly higher than the average salary in Arizona of \$52,774.
7. At a salary of at least \$74,984, Respondent's salary is sufficient to pay for her own attorney's fees in this matter and she does not require me to pay her fees to assert her legal rights in this proceeding.

RESPONDENT'S ASSETS IN CHECKING AND SAVINGS AND LOW DEBT

BURDEN

8. Despite Respondent's deficient discovery response on her current checking and savings checking and savings accounts with Wells Fargo, her partial statements show a balance of \$29,262.58. **(SEE EXHIBIT 15).**
9. Further, Respondent's bank statements from 2021-2022 show that her balance has gone from \$22,234 to \$29,262. This is an increase of over \$7,028 which cuts against Respondent's claim in her Affidavit that she has had a "significant shortfall" since the divorce decree was entered. Having over \$29,000 in checking and savings is a more than enough to pay Respondent's estimated attorney's fees in this proceeding.
10. Despite Respondent's deficient discovery response on her Discover credit card statements, her Discover has a balance of only \$2,838.94. **(SEE EXHIBIT 16).** Respondent is carrying a low debt burden.
11. Her credit card amount is low in comparison to her gross income of at least \$74,984. Further, her credit card was paid off in full every month which demonstrates an excess in monthly income to provide for expenses and pay down monthly debts which would include attorney's fees.

RESPONDENT'S RECENT MOVE FROM NORTH CAROLINA TO ARIZONA

12. Respondent recently moved to Arizona. North Carolina and Arizona are near opposite coasts of the United States. These states are roughly 2000 miles away. According to several Internet searches, the cost of such a move could range between \$3,460 to \$11,220 depending on movers, possessions, and fuel costs.
13. Respondent's move demonstrates that she can meet her daily needs while providing excess income to fund a cross-country move. This is further evidence of surplus of funds to pay attorney's fees in this proceeding.

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

4/4/2023

Dated: _____


ID MzL3hS18pKrZV3NM29MkU5Yg

Andrew Lowe Billett

RUTHANNE BILLET 19777 N 76TH STREET, #1127 #1127 SCOTTSDALE, AZ 85255		Employee No.: XXXXXXXXXX Process Level: RV400 Department: 04220 User Level: RV4228	Amount Date: 9/22/2022 \$1,839.41 Number: 236814699 Period begin date: 9/3/22 Period end date: 9/16/22	FEDERAL INCOME TAX SUMMARY	
				Current	YTD
				2,884.60	54,807.40
				-548.58	-10,423.02
				2,336.02	44,384.38
				-469.29	-8,916.51
				-27.32	-519.08
				1,839.41	34,948.79
HOURS AND EARNINGS					
Description	Current Pay Period		YTD		
	Hours	Earnings	Earnings		
TELECOMM	72.00	2,596.14	52,499.72		
HOLDYPAY	8.00	288.46	1,730.76		
XCLXTRHR			0.00		
SCKLVTKN			576.92		
Total		2,884.60	54,807.40		
PAYMENT DISTRIBUTION					
			Account	Amount	
			xxxxx XXXXXXXXXX	\$1,839.41	
ACCRUAL BALANCES					
Plan	Prior	Accrual +	Usage -	Adj +/-	Current
ANNUAL	148.00	4.00			152.00
FAMILY SICK	40.00				40.00
SICK	120.90	3.70			124.60
PRE-TAX DEDUCTIONS					
Description	Current	YTD			
*ASRSRET	352.50	6,697.50			
*DELTA 4	23.34	443.46			
*TASCMRA	105.77	2,009.63			
*SURLIFE	4.02	76.38			
*BCBSAZ4	57.30	1,088.70			
*AVESIS3	5.65	107.35			
Total		548.58	10,423.02		
TAXES					
Description	Current	YTD			
FEDERAL	179.51	3,410.69			
SOC SEC	166.69	3,167.11			
MEDICARE	38.99	740.81			
ARIZONA	84.10	1,597.90			
Total		469.29	8,916.51		
AFTER-TAX DEDUCTIONS					
Description	Current	YTD			
ASRS LTD	5.48	104.12			
SUP LIFE	21.84	414.96			
Total		27.32	519.08		

Visit the YES Website at <http://yes.az.gov>
to view your paychecks, check leave balances, update your mailing address, and more!



STATE OF ARIZONA
 Department of Administration
 General Accounting Office
 100 North 15th Avenue, Suite 302
 Phoenix, Arizona 85007

PAYROLL
 PAYABLE THRU STATE SERVICING BANK
 OF STATE TREASURER OF ARIZONA
 91-113 / 1221

Date
9/22/2022

Number
236814699

PAY VOID VOID VOID VOID VOID VOID VOID VOID

Amount
\$ *****1,839.41

PAY TO THE ORDER OF
 RV400 04220 RV4228
 RUTHANNE BILLET
 19777 N 76TH STREET, #1127
 #1127
 SCOTTSDALE, AZ 85255

NON-NEGOTIABLE
DIRECT DEPOSIT ADVICE
 PURSUANT TO THE PROVISION OF ARS 23-351



Jobs

Salaries

Messages

Profile

Sign In

Salary

Jobs

Average Salary in Arizona

Yearly

Monthly

Weekly

Hourly

Table View

\$28,422

Arizona

\$91,732

\$52,774 /year

\$25 /hour

Get New Jobs Em

10+ Jobs

Within 25 miles of Ar

Enter your email

By clicking the button above
Use and acknowledge I have
receive email job alerts.

Nearby Jobs

Within 25 miles of Ar



FT-CDL Delive



10+ Jobs

in the Arizona area

Enter your email

Get Notified

Get new jobs emailed to you daily

By clicking the button above, I agree to the ZipRecruiter Terms of
Use and acknowledge I have read the Privacy Policy, and agree to
receive email job alerts.

Wells Fargo Combined Statement of Accounts



0003161 01 AB 0.491 **AUTO T5 2 2392 85255-456377 -C02-P03164-I



RUTHANNE BILLET



Questions?

Available by phone 24 hours a day, 7 days a week:
We accept all relay calls, including 711
1-800-TO-WELLS (1-800-869-3557)
En español: 1-877-727-2932

Online: wells Fargo.com

Write: Wells Fargo Bank, N.A. (300)
P.O. Box 6995
Portland, OR 97228-6995

You and Wells Fargo

Thank you for being a loyal Wells Fargo customer. We value your trust in our company and look forward to continuing to serve you with your financial needs.

Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to wells Fargo.com or call the number above if you have questions or if you would like to add new services.

- Online Banking Direct Deposit
- Online Bill Pay Auto Transfer/Payment
- Online Statements Overdraft Protection
- Mobile Banking Debit Card
- My Spending Report Overdraft Service

2392-02-00-0003161-0001-0010053

Other Wells Fargo Benefits



Summary of accounts

Checking and Savings

*balanced
09/12/2022*

Account	Page	Account number	Ending balance last statement	Ending balance this statement
Wells Fargo® Preferred Checking	2		1,336.51	7,827.54
Wells Fargo Platinum Savings	5		26,579.29	21,435.04
Total deposit accounts			\$27,915.80	\$29,262.58





DISCOVER® MORE® CARD ENDING IN [REDACTED]
CARDMEMBER SINCE 2000



Account Summary 08/07/2022 - 09/06/2022

Previous Balance	\$2,181.18
Payments and Credits	-\$2,181.18
Purchases	+\$2,838.94
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Fees Charged	+\$0.00
Interest Charged	+\$0.00

New Balance: **\$2,838.94**

See Interest Charge Calculation section following the Fees and Interest Charged section for detailed APR information

Credit Line	\$22,000
Credit Line Available	\$19,158
Cash Advance Credit Line	\$5,000
Cash Advance Credit Line Available	\$5,000

FICO® Score 8 based on TransUnion® data:
787
Very Good
AS OF 08/31/22
Updated Monthly
See Key Factors that help explain your score at Discover.com or visit our mobile app

We noticed you're not enrolled in paperless statements yet

Get your statement notifications faster online and help the environment by cutting waste. Just scan the QR code to get started and go paperless today.



Payment Coupon

Detach at perforation above and return with check payable to Discover. Do not fold, clip, staple or send cash.



RUTHANNE BILLET
[REDACTED]



Payment Information

New Balance	Minimum Payment	Payment Due Date
\$2,838.94	\$57.00	10/02/2022

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$41.00.



Get a statement credit

Refer a friend to Discover and you can each get a statement credit when they get a card.

See details at [Discover.com/sharediscover87](https://discover.com/sharediscover87)

Notice: See reverse side for important information

ACCOUNT NUMBER ENDING IN [REDACTED]

New Balance	\$2,838.94
Minimum Payment Due	\$57.00
Payment Due Date	10/02/2022

Amount Enclosed	\$
For a faster, easier way to pay...	Discover.com 1-800-347-2683 See reverse for payment cut off times.

PO BOX 45909
SAN FRANCISCO CA 94145-0909



New address, email or phone? Please update on reverse.

000001986459344266105028389400136660005700



eSignature Details

Signer ID:	MzL3hS18pKrZV3NM29MkU5Yg
Signed by:	Andrew Lowe Billett
Sent to email:	andyb08@outlook.com
IP Address:	69.1.225.129
Signed at:	Apr 4 2023, 6:31 pm CDT