IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA

CHRISTOPHER ADAM JACKSON,

Plaintiff,

v.

ALAN DAVID ABRAMS,

Defendant.

Civil Action No. 25-C-328
Judge Poling

DEFENDANT'S MOTION FOR A PREFILING INJUNCTION

COMES NOW the Defendant, Alan David Abrams, with a Motion for a Prefiling Injunction, stating as follows:

1. Within the past year, the Plaintiff, Christopher Adam Jackson, has filed a series of pro see federal and state lawsuits, many of which essentially arise from the same subject matter:

Jackson, Christopher Adam (pla)	5:2025cv00476	Jackson v. State of West Virginia et al	WEST VIRGINIA SOUTHERN DISTRICT COURT	07/30/2025	
Jackson, Christopher Adam (pet)	5:2025cv00480	Jackson v. Dixon	WEST VIRGINIA SOUTHERN DISTRICT COURT	08/01/2025	06/03/2026
Jackson, Christopher Adam (pla)	5:2025cv00534	Jackson v. Dickens et al	WEST VIRGINIA SOUTHERN DISTRICT COURT	09/04/2025	

2. No. 5:2025-cv-480[1] was dismissed on June 3, 2026; a federal magistrate recommended dismissal of No. 5:2025-cv-476[2] in December 2025;[3] and in No. 5:2025-cv-534[4] in

[1] The defendant was Curtis Dixon, Superintendent of the Southern Regional Jail and Correctional Facility, https://ecf.wvsd.uscourts.gov/cgi-bin/DktRpt.pl?105687390753589-L_1_0-1. The suit sought to challenge an order directing psychiatric and psychological testing of the plaintiff, to which his counsel consented. Exhibit A.

[2] The defendants are the State of West Virginia, Raleigh County Magistrate Paul Blume, the Raleigh County Prosecuting Attorney's Office, Prosecutor John Gallagher, Assistant Prosecutor Ashley Acord, Assistant Prosecutor Marie Bechtel, the West Virginia Attorney General, the Southern Regional Jail and Correctional Facility, Commissioner David L. Kelley, Acting Cabinet Secretary Douglas P. Bluffington, II, Jail Superintendent Curtis Dixon, Jail Deputy Superintendent, Andrew Hudson, Wexford Health Sources, Inc., Anthony Salvatore, Esq., and Jail Unit Manager, Valerie Brown. https://ecf.wvsd.uscourts.gov/cgi-bin/DktRpt.pl?508879878306583-L_1_0-1

[3] Exhibit B.

[4] The defendants are Beckley Police Officer, Seth Dickens, Deputy Chief, David Allard, Chief Dean Bailey, and the City of Beckley, https://ecf.wvsd.uscourts.gov/cgi-bin/DktRpt.pl?97089168005457-

which a plethora of "emergency," disqualification, protective order, reconsideration, and motions similar to those filed in the instant case were denied.[5] Despite this, the plaintiff persists in filing similar motions.[6]

3. The plaintiff has also filed the following overlapping state court suits:

41 - Raleigh	CC-41-2026-C-140	CHRISTOPHER ADAM JACKSON	CHRISTOPHER ADAM JACKSON v. KATHRYN BLANKENSHIP	4/16/2026	Open	Michael E. Froble
41 - Raleigh	CC-41-2025-C-318	Christopher Adam Jackson	Christopher Adam Jackson v. Sarah A. Abrams	8/14/2025	Closed	Todd Kirby
41 - Raleigh	CC-41-2025-C-324	CHRISTOPHER ADAM JACKSON	CHRISTOPHER ADAM JACKSON v. ALAN DAVID ABRAMS	8/18/2025	Open	Darl Poling
41 - Raleigh	CC-41-2025-C-323	CHRISTOPHER ADAM JACKSON	CHRISTOPHER ADAM JACKSON v. SARAH ALAN ABRAMS	8/18/2025	Closed	Todd Kirby
41 - Raleigh	CC-41-2025-C-326	Christopher A. Jackson	Christopher A. Jackson v. Alan D. Abrams	8/20/2025	Open	Darl Poling
41 - Raleigh	CC-41-2025-C-379	CHRISTOPHER ADAM JACKSON	CHRISTOPHER ADAM JACKSON v. PCB NANK	10/2/2025	Closed	Todd Kirby

4. No. 2025-C-318, a lawsuit against the Defendant, Alan David Abrams, and his daughter, Sarah Abrams, raising some of the same issues the Plaintiff has raised in this case, was dismissed on November 3, 2025,[7] and the Plaintiff's post-judgment motion, referencing not only No. 2025-C-318, but "the other 7 cases Plaintiff has filed in this court," was denied on November 18, 2025.[8]

5. No. 2025-C-324, a lawsuit against the Defendant, Alan David Abrams, and his daughter, Sarah Abrams, seeking to enforce an oral contract to sell a timeshare,[9] prompting a motion to dismiss,[10] another omnibus filing by the Plaintiff referencing eight (8) different actions,[11]

L 1 0-1. The suit arises from a bond revocation hearing conducted on May 16, 2025, arising from some of the same alleged domestic violence protective order which has been raised in the instant case. Exhibit C.

[5] Exhibit D and Exhibit E.

[6] Exhibit F.

[7] Exhibit G.

[8] Exhibit H.

[9] Exhibit I.

[10] Exhibit J.

[11] Exhibit K.

and a Supreme Court order denying Plaintiff's motion to disqualify the Court in No. 2025-C-324 and No. 2025-C-328.[12]

6. No. 2025-C-325, a lawsuit against the Defendant, Alan David Abrams, and his daughter, Sarah Abrams, was dismissed on November 3, 2025, for lack of subject matter jurisdiction as the issues disputed arose from an alleged marital relationship between the Plaintiff, and Sarah Abrams,[13] prompting additional post-judgment motions, which were denied by the Court.[14]

7. No. 2025-C-328, this lawsuit, is yet another action against the Defendant, Alan David Abrams, arising from some of the same circumstances as the Plaintiff's other lawsuits, which has generated no fewer than ninety-eight (98) docket entries, and such orders as denying the Plaintiff's motion to use the e-filing system (Docket Entry No. 36), requiring an updated financial statement (Docket Entry No. 54), requiring the Plaintiff to file amended pleadings (Docket Entry No. 57), denying the Plaintiff's motion to stay (Docket Entry No. 59), denying motion to confirm and enforce arbitration award (Docket Entry No. 70), denying motion for declaratory judgment regarding insurance validity (Docket Entry No. 78), denying motion to sanction a fraud upon the Court and for immediate relief based on recorded evidence of a conspiracy (Docket Entry No. 80), denying Plaintiff's motion to disqualify counsel and for a protective order (Docket Entry No. 84), denying Plaintiff's emergency motion to enforce in forma pauperis status (Docket Entry No. 85), denying Plaintiff's motion for leave to file supplemental complaint (Docket Entry No. 86), thereby prompting the Plaintiff's pattern of filing post-ruling motions seeking this Court's disqualification

[12] Exhibit L.

[13] Exhibit M.

[14] Exhibit N, Exhibit O.

and the out-of-circuit assignment of a presiding judge (Docket Entry No. 91), which was denied by the Chief Justice (Docket Entry No. 94), that as might be expected, prompted the Plaintiff to file yet another reconsideration motion (Docket Entry No. 98).

8. No. 2025-C-378, a lawsuit against PCB Bank, arising from a motor vehicle which the Plaintiff has claimed in pleadings filed in this action will support his claims against defendants he has sought to add to this action, which lawsuit against PCB Bank has been dismissed.[15]

9. No. 2026-C-140, is an omnibus suit, nominally filed against the Raleigh County Magistrate Clerk, collectively making the same allegations the Plaintiff has made in a multiplicity of actions, including this lawsuit,[16] prompting yet another judicial disqualification motion, and its denial by the Chief Justice.[17]

10. The Defendant's motion to dismiss this action has been fully briefed, is ready for disposition, and the Defendant waives a hearing on the same, as hearings on dispositive motions are not required.[18]

11. Generally, orders granting motions to dismiss pursuant to Rule 12(b) of the West Virginia Rules of Civil Procedure grant dismissal without prejudice.[19]

12. In this case, where the Plaintiff has again taken a "kitchen sink" approach to pleading, the Defendant submits that it makes sense to enter a dismissal, without prejudice, but to

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[15] Exhibit P.

[16] Exhibit Q.

[17] Exhibit R.

[18] Trial Court Rule 22.03 ("The court may require or permit hearings on motions ..."); *Blackburn v. City of Smithers*, 2024 W. Va. App. LEXIS 336, *9-10, 2024 LX 62537, 2024 WL 5002537 ("Pursuant to Rule 22.03 of the West Virginia Trial Court Rules, whether or not a circuit court holds a hearing on a motion is discretionary with the circuit court.").

[19] See Syl. pt. 3, *Rhododendron Furniture & Design, Inc. v. Marshall*, 214 W. Va. 463, 466, 590 S.E.2d 656, 659 (2003) (citation omitted).

require the Plaintiff to submit any new complaint making any of the same allegations as asserted in this action to the Court for a prefiling review, including permitting any defendants named in such new complaint to advise the Court as to the status of prior and/or current litigation over the same subject matter.

13. Our appellate courts have affirmed the entry of pre-filing injunctions in similar circumstances.[20]

14. The Fourth Circuit has set forth four factors that "a district court should consider," along with all the relevant circumstances, "in deciding whether to issue a prefiling injunction" as a sanction.[21]

15. *First*, the court must consider Plaintiff's "history of litigation, in particular whether he has filed vexatious, harassing, or duplicative lawsuits."

16. *Second*, the court must consider whether Plaintiff "had a good faith basis for pursuing the litigation or simply intended to harass."

17. *Third*, the court must consider "the extent of the burden on the courts and other parties resulting from the [Plaintiff's] filings."

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[20] *Mark V.H. v. Delores J.M.,* 2019 W. Va. LEXIS 410, *39-40, 2019 WL 4257183 ("Numerous states have adopted statutes or rules that permit restrictions on litigants who have been determined to be vexatious — that is, 'persons who persistently and habitually file lawsuits without reasonable grounds, or who otherwise engage in frivolous conduct in the courts.'"); *Stephen U. v. Caren J.*, 2025 W. Va. App. LEXIS 234, 2025 LX 386679, 2025 WL 2491253; *Tabb v. Jefferson Cty. Comm'n*, 2018 W. Va. LEXIS 224, *13, 2018 WL 1444286 ("For the foregoing reasons, we affirm the circuit court's ... three orders, entered December 30, 2016, that (1) denied his motion to amend his appeal of the 2016 tax assessments; (2) denied his motion to alter or amend the April 20, 2016, order denying the appeal; and (3) granted the county commission's motion for sanctions by limiting petitioner's right to initiate a legal proceeding to those instances where petitioner gives advance notice to the prospective opposing parties and obtains the court's approval for the proceeding or initiates the proceeding through a West Virginia attorney who certifies, pursuant to Rule 11 of the West Virginia Rules of Civil Procedure, that the proceeding is neither frivolous nor meant to harass."

[21] *Thomas v. Fulton*, 260 F. App'x 594, 596 (4th Cir. 2008).

18. *Finally*, the Court must consider "the adequacy of alternative sanctions."[22]

19. While such an injunction should be used sparingly and "remain very much the exception to the general rule of free access to the courts," the Fourth Circuit explained that a district judge may limit a litigant's access to the courts in "exigent circumstances, such as a litigant's continuous abuse of the judicial process by filing meritless and repetitive actions."[23]

20. Here, the Plaintiff has an extensive history of filing suits and disqualification motions, without any good faith basis, against judges, opposing attorneys, court officials, and private parties that are vexatious, harassing, and duplicative, and place unreasonable burdens on the same, and there is likely nothing other than a litigation injunction to stop the Plaintiff.

WHEREFORE, the Defendant, Alan David Abrams, respectfully requests that his Motion to Dismiss be GRANTED; that the Complaint be DISMISSED, WITHOUT PREJUDICE, and that the Plaintiff be ENJOINED from filing additional lawsuits in the Circuit Court of Raleigh County against the Defendant, Alan David Abrams, without first giving advance notice to the Defendant and obtains the Court's approval for the proceeding or initiates the proceeding through a West Virginia attorney who certifies, pursuant to Rule 11 of the West Virginia Rules of Civil Procedure, that the proceeding is neither frivolous nor meant to harass, and for such further relief as the Court deems appropriate.

ALAN DAVID ABRAMS

By Counsel

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[22] *Id.*

[23] *Cromer v. Kraft Foods N. Am., Inc.*, 390 F.3d 812, 818 (4th Cir. 2004) (citation omitted).



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