CHRISTOPHER ADAM JACKSON,

Plaintiff,

v.

ALAN DAVID ABRAMS,

Defendant.

Civil Action No. 25-C-328
Judge Poling

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE OVERSIZED CONSOLIDATED REPLY AND INCORPORATED MEMORANDUM SHOWING GOOD CAUSE

COMES NOW the Defendant, Alan David Abrams, with Defendant's Response to Plaintiff's Motion for Leave to File Oversized Consolidate Reply and Incorporated Memorandum Stating Good Cause, stating as follows:

1. The Defendant's Motion to Dismiss has been fully briefed and is ripe for decision.

2. Both the original and latest Motions to Amend have been fully briefed and are ripe for decision.

3. Essentially ignoring this Court's prior order directing him to comply with the Trial Court Rule's page limitation, the Plaintiff has filed a 301-page document as a reply brief, claiming that he needs to submit a **301-page document** to reply to the Defendant's response, **which was 11 pages**.

4. Obviously, this is absurd on its face and does not justify anything beyond the 20-page limit under Trial Court Rule 22.01.

5. More importantly, when considering a Rule 12(b)(6) motion to dismiss, a court "may consider (1) the facts set forth in the complaint, (2) documents attached to the complaint, and (3) matters of which judicial notice may be taken …" L. Palmer, LITIGATION HANDBOOK ON

marks and citation omitted).

6. The Defendant's Motion to Dismiss complies with this standard and the Plaintiff's submission does not.

7. Similarly, "[T]he standard for denying leave to amend based on futility is the same as the standard for granting a motion to dismiss." *Id.* at § 15(a)[5] (footnote omitted).

8. Accordingly, the Plaintiff's Motions to Amend are subject to the same scrutiny as if the Defendant had moved to dismiss the proposed Amended Complaint, precluding consideration of anything other than the Amended Complaint, documents attached to the Amended Complaint, and matters of which judicial notice may be taken, not the Plaintiff's 301-page document dump.

9. Examining the proposed Amended Complaint, attached as **Exhibit A**, which attempts to add a corporate Plaintiff that the Plaintiff concedes he is unauthorized to represent, and new Defendants, Sarah Abrams, Chad Hopkins, and Rachel Hopkins, having nothing to do with the personal protection proceeding which is the sole subject of the original Complaint, and includes product liability claims against parties other than those identified in the caption of the proposed Amended Complaint, confirms that it is an exercise in futility for the reasons that have already been fully briefed.

WHEREFORE, Defendant, Alan David Abrams, respectfully requests that the Motion for Leave to File Oversized Consolidated Reply be DENIED, that the Motions to Amend be DENIED, that the Motion to Dismiss be GRANTED, and that the Motion for a Pre-Filing Injunction be GRANTED.

By Counsel



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CHRISTOPHER ADAM JACKSON,

Plaintiff,

v.

ALAN DAVID ABRAMS,

Defendant.

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Judge Poling

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2026, I served the foregoing DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE OVERSIZED CONSOLIDATED REPLY AND INCORPORATED MEMORANDUM SHOWING GOOD CAUSE by United States mail, postage prepaid, addressed as follows:

Christopher Adam Jackson
735 South Kanawha Street
Beckley WV 25801



Ancil G. Ramey (WV Bar #3013)

Christopher Adam Jackson,

and Amplius Holdings, LLC (to appear by counsel),

"Plaintiffs",

EXHIBIT A

v.

Civil Action No. CC-41-2025-C-328
Honorable Judge Darl Poling

Alan David Abrams, Esq.;
Sarah Abrams;
Chad Hopkins; and
Rachel Hopkins,
"Defendants".

FIRST AMENDED COMPLAINT

(Intentional Torts; Professional Negligence and Fiduciary Breach; Spoliation; Reservation of Product/Warranty/PI Claims)

NOW COME Plaintiffs, Christopher Adam Jackson, In Propria Persona, with all rights reserved, and Amplius Holdings, LLC (to appear by licensed counsel), and state as follows:

Parties, Jurisdiction, and Venue

1. Plaintiff Christopher Adam Jackson is a natural person residing at 735 South Kanawha Street, Beckley, Raleigh County, West Virginia 25801.
2. Plaintiff Amplius Holdings, LLC is a West Virginia limited liability company with its principal office at 735 South Kanawha Street, Beckley, West Virginia 25801, operating d/b/a Opifex Designers & Builders and Carbon 304 Wood & Metal Works at 741 South Kanawha Street, Beckley, West Virginia 25801. The LLC will appear through counsel for all purposes.

Virginia 25801, and conducts business at or near 108 Main Street, Beckley, West Virginia 25801.

4. Defendant Sarah Abrams resides at 107 West Avenue, Beckley, West Virginia 25801.
5. Defendant Chad Hopkins resides at 224 Morning Point Lane, Beaver, West Virginia 25813.
6. Defendant Rachel Hopkins resides at 224 Morning Point Lane, Beaver, West Virginia 25813.
7. Jurisdiction and venue are proper because the acts and omissions alleged occurred in Raleigh County, West Virginia, and all parties reside or conduct business in this County.

General Factual Allegations

8. Relationship and background. On June 14, 2017, Plaintiff and Sarah Abrams participated in a marriage ceremony in Pawleys Island, South Carolina, with a marriage license and certificate executed by an officiant and a probate judge. They publicly held themselves out as married and cohabited for years. Certain Defendants have disputed the marriage. Plaintiff has filed a separate declaratory action concerning the marriage's validity; no ruling has issued.
9. Vehicle defect; arbitration; noncompliance; charges without cure. In December 2019, Plaintiff purchased a 2019 Nissan Titan from a dealership operated by persons aligned with Defendants. The vehicle repeatedly disengaged from gear and rolled, and suffered significant electrical and drivetrain malfunctions. Multiple repair orders document the issues. An arbitration award ordered repurchase; repurchase did not occur. Despite a valid warranty, the dealer invoiced approximately $7,018 for repairs, retained the vehicle for roughly 178 days, and returned it unrepaired.
10. Catastrophic injury from rollaway. On April 26, 2025, shortly after the vehicle's return, it disengaged from gear and ran over Plaintiff at his business, causing severe injuries including traumatic brain injury with diffuse axonal injury, new-onset seizure disorder with approximately 25 recorded convulsive episodes (including in custody), lumbar radiculopathy with foraminal compromise, severe post-concussive disorder, post-traumatic stress, maxillofacial/dental trauma, and functional impairments (cognitive slowing, dizziness, photophobia/hyperacusis, sleep disturbance, fall risk). Imaging and clinical findings corroborate these diagnoses.

unsuccessful pleas for repair/repurchase compliance and safety assurance, Plaintiff informed Defendants he would report the matter and file suit. Within approximately two hours, an ex parte protective proceeding was initiated against Plaintiff. Thereafter, Plaintiff's lawful service and filings were recast as "harassment" to justify continued restraints and to chill petitioning.

12. DVP, alleged violations, incarceration. An emergency protective order issued April 23, 2025. Two alleged violations were later pursued. A bond revocation hearing occurred on or about May 16, 2025; Plaintiff was remanded without bond for approximately three months and then placed on home confinement for roughly one additional month.

13. Fabricated allegations—texts and nonexistent video. Alleged threats via text (claims that Plaintiff would burn or tear down a house and coerce dismissal of a protective order) were later disproved by a forensic phone extraction showing no such texts. A separate alleged violation was said to be captured on an inculpatory video that was never produced. Plaintiff had recorded his own exculpatory video documenting a lawful visit to obtain a $500 refund check; This check was discussed with Rachel Hopkins only day prior to Plaintiff stopping by Lewis Nissan with the sole purpose of picking up the check, Rachel Hopkins never mentioned this to the investigating officer. Rachel Hopkins also lied to the investigating Officer as did Sarah Abrams and Chad Hopkins as to the location of Sarah Abrams Office, and failed to mention that Sarah Abrams had been working in the back title clerk office for a matter of years, and that it was now her primary office. Prosecutors later acknowledged they never received the alleged inculpatory video despite multiple requests, and after Plaintiff entered Motions for Discovery and Brady related Materials.

14. Hearings and appearances. On May 15–16, 2025, hearings were held concerning alleged violations and bond, during which Defendant Abrams and Defendant Chad Hopkins appeared and testified, under penalty of Perjury. Plaintiff alleges material falsehoods were presented that prompted remand without bond. David Abrams also admitted that he was not aware of any physical abuse perpetuated by Plaintiff against his daughter. David Abrams and Chad Hopkins also testified that the marriage between Plaintiff and Sarah Abrams was not valid , regardless of them being present at the marriage ceremony and witnessing the marriage certificate being signed by the Ordained Minister.

15. Intimidation of counsel; competency detour. Immediately before a June 10, 2025 hearing on bond reinstatement, Sarah Abrams confronted Plaintiff's then-counsel in

courtroom visibly shaken and subsequently filed, without Plaintiff's consent, an agreed order for psychological/psychiatric evaluation that derailed pending matters and placed proceedings in abeyance pending competency determinations. The evaluator later reported delays due to counsel's non-production of records; only after Plaintiff filed federal habeas did the evaluation proceed, and Plaintiff was deemed competent.

16. Retaliatory PSO timed to TRO/PI. On August 7, 2025, at approximately 1:30 p.m., Plaintiff filed a motion in Circuit Court for an emergency temporary restraining order and preliminary injunction, supported by a legal brief, alleging interference with his release from incarceration, creditor tampering, and obstruction of home confinement at 735 South Kanawha Street. Approximately two hours later, at 3:46 p.m., Defendant Abrams filed a petition in Magistrate Court for a temporary personal safety order ("PSO") that largely mirrored prior allegations.

17. PSO dismissal. A temporary PSO issued the same day. After an evidentiary hearing on August 19, 2025, the PSO was denied and dismissed. The court found insufficient proof of qualifying conduct and that the petitioner was not the victim of harassment or repeated credible threats of bodily injury.

18. Extra-judicial creditor interference. Plaintiff alleges that Defendants communicated with at least two creditors or lienholders—Kim Lane and Robert (Bob) Canter—about taxes, insurance, and alleged arrears to precipitate defaults and obstruct home confinement at 735 South Kanawha Street. In a recorded call, Defendant Abrams pressed Lane to sign and transmit a document asserting unpaid taxes "today" or "yesterday" to another lawyer to block home confinement; Lane refused. Abrams also contacted Canter, discussed alleged 2024 tax delinquency, and offered to apply funds wired to his trust account to "arrearages." Canter signed an affidavit after Abrams pressured him. Plaintiff alleges 2025 taxes were paid upon release, and that 2024 taxes were not delinquent until later in the year; he had a history of timely payment except for periods impacted by incarceration.

19. Fiduciary handling of funds; implied attorney role. While Plaintiff was incarcerated, Plaintiff's brother transmitted money to Defendant Abrams to be held and used to pay Plaintiff's creditors and mortgage. Abrams admits receiving the funds in his trust account and communicating with creditors concerning those funds. By accepting custody and engaging in creditor communications on Plaintiff's behalf, Abrams assumed fiduciary duties as custodian/agent (segregation, records, prompt notice, accounting, delivery) and, by conduct and history of prior representation and

matters.

20. Coercive "buy-out" overtures and engineered violations. Defendant Abrams proposed meeting if Plaintiff would provide a list of what it would take to "get out of Sarah's life permanently," and "Listen Adam, Just tell me what you want out of all of this", obtain counsel approval, and pre-disclose topics, and separately suggested reaching an outcome or "everyone take their best hold." Defendants also sought to engineer further violations while Plaintiff was on home confinement by rebranding lawful civil service and filings as harassment and by portraying innocuous movements and social media posts as violating orders. Additionally, Defendants, through counsel, alleged additional criminal allegations of planting a listening devise, which will be proven as yet another attempt to secure a DVP violation to reincarcerate the Plaintiff and silence his lawful litigation.

21. Family-targeted intimidation and defamation. On the eve of a protective-order hearing, Sarah Abrams called Plaintiff's mother and claimed Plaintiff was "highly mentally unstable," said she had been abused, and asserted that serving officers told her Plaintiff was "a big meth head." Serving officers denied making any such statements and confirmed that Sarah Abrams could not have known who served the order. Plaintiff's mother declined to attend due to fear. Separately, Defendant Abrams called Plaintiff's brother in a campaign to alienate him and deter help.

22. Witness intimidation and threats to counsel. Sarah Abrams intimidated two subpoena-identified civilian witnesses—Arran Adams and Robert Brooks—leading them to refuse to testify and contemplate leaving the area. Minutes before the June 10, 2025 hearing, Sarah Abrams threatened Plaintiff's then-counsel inside the courthouse; multiple witnesses and courthouse cameras corroborate the encounter. Plaintiff alleges these acts were under the direction and with substantial assistance of Defendant Abrams.

23. Attempt to criminalize a 2017 accident. Defendants attempted to rebrand an accidental injury from 2017 as "domestic battery" to violate a protective order and reincarcerate Plaintiff, despite medical records indicating the injury could not have been inflicted as suggested.

24. Non-testimonial initiation acts and material falsity. Sarah Abrams signed two criminal complaints whose core assertions were later disproved by objective evidence, including a forensic phone extraction disproving alleged threat texts.

that was never produced, yet it was used to obtain or maintain custody.

25. Retaliatory pattern and purpose. The timeline shows a calculated sequence: (a) immediate protective-order filings within hours after Plaintiff's notice he would report and sue concerning the defective vehicle; (b) immediate PSO within hours after Plaintiff's TRO/PI filing; (c) a coordinated narrative to relabel lawful petitioning and civil service as "harassment"; (d) parallel extra-judicial outreach to creditors timed to impede home confinement and trigger defaults all while interfering with a standing court order that was signed the very same day; and (e) compounded reputational injury and economic harm.

26. Economic, credit, reputational, and emotional harms. Plaintiff's incarceration and home confinement impeded his ability to pay taxes, mortgages, utilities, equipment financing, and insurance. His personal credit score fell from approximately 752, and his business credit rating (previously "perfect") was damaged. Vendors and lenders reduced or withdrew terms; equipment faced repossession; projects were cancelled; clients were lost. Plaintiff suffered severe emotional distress and reputational injury.

27. Business harms. Plaintiff owns Amplius Holdings, LLC, operating the d/b/a entities identified above. These businesses depended on credit, vendor terms, project financing, reputation, and uninterrupted operations. As a proximate result of Defendants' conduct, Amplius incurred lost profits, lost financing/customers, increased costs, and enterprise-value diminution.

28. Evidence and preservation. Plaintiff possesses: a forensic phone extraction; audio recordings and transcripts of creditor calls; exculpatory video concerning the dealership visit; text and email threads providing full context; GPS home-confinement data; and witness statements. Plaintiff has sought Magistrate Court hearing audio/video for proceedings on May 16 and June 10, 2025, and for the PSO. On August 20, 2025, Plaintiff served a written litigation-hold and preservation notice by certified mail on Defendant Abrams (Exhibit L), demanding preservation of all ESI, trust-account ledgers, and communications with creditors or third parties, and providing 14 days to respond. No response was received. Plaintiff alleges that any deletion, concealment, or failure to preserve after this notice supports adverse inferences and a standalone spoliation claim.

29. Integrity of proceedings; vulnerability. Defendants were aware of Plaintiff's catastrophic medical condition and related vulnerability, yet pursued a concerted

courts.

Count I — Abuse of Process (All Defendants)

30. Plaintiffs incorporate paragraphs 1–29. Defendants misused regularly issued judicial process, including DVP/PSO machinery, for ulterior objectives unrelated to legitimate protective aims—coercing a "buy-out" of a relationship; silencing petitioning; obstructing home confinement; precipitating creditor defaults; and intimidating counsel and witnesses.

31. Defendants committed willful acts not proper in the regular conduct of such proceedings by leveraging the pendency of temporary orders to pressure Plaintiff and third parties; rebranding lawful litigation and service as harassment; timing filings to undercut Plaintiff's TRO/PI; and coordinating extra-judicial creditor contacts to secure collateral leverage. These acts caused loss of liberty, reputational harm, emotional distress, and economic injury. Plaintiffs seek compensatory and punitive damages.

Count II — Malicious Prosecution (All Defendants)

32. Plaintiffs incorporate paragraphs 1–29. Defendants initiated and continued the PSO proceeding without probable cause and with malice. The proceeding terminated in Plaintiff's favor upon dismissal after hearing. Defendants' retaliatory timing, material falsehoods (fabricated texts; nonexistent video), and coercive objectives evidence malice and want of probable cause. Plaintiff suffered loss of liberty, reputational injury, emotional distress, and economic damages. Plaintiffs seek compensatory and punitive damages.

Count III — Defamation (Extra-Judicial Publications) (Against Alan David Abrams; Sarah Abrams;and Chad Hopkins)

33. Plaintiffs incorporate paragraphs 1–29. Defendants published false statements of fact outside judicial proceedings to third parties, including creditors and business counterparts, asserting or implying that Plaintiff engaged in criminal or unethical conduct and that his financial/tax status was delinquent, timed to inflict reputational harm and to trigger defaults and deny home confinement. These unprivileged publications, made at least negligently and, upon information and belief, with actual malice, caused reputational and pecuniary loss to both Plaintiffs. Plaintiffs seek compensatory and punitive damages.

34. Plaintiffs incorporate paragraphs 1–29. Defendants engaged in extreme and outrageous conduct by fabricating evidence and accusations, weaponizing protective processes to jail a catastrophically injured person, intimidating counsel and witnesses, and orchestrating extra-judicial interference with credit and home confinement to silence and punish petitioning activity. Defendants intended to cause, or acted with reckless disregard of the substantial likelihood of causing, severe emotional distress. Plaintiff suffered severe distress corroborated by objective life impacts. Plaintiffs seek compensatory and punitive damages.

Count V — Tortious Interference with Contract/Business Expectancy (Against Alan David Abrams; Sarah Abrams; Rachel Hopkins)

35. Plaintiffs incorporate paragraphs 1–29. Plaintiffs maintained contracts and business expectancies with lenders, creditors, vendors, and customers. Defendants intentionally and improperly interfered by communicating false or misleading narratives to creditors and third parties designed to trigger defaults, impair financing, destroy business relationships, and obstruct home confinement tied to property status. Plaintiffs suffered lost profits, lost financing and customers, increased fees and charges, repossession risks, and enterprise-value diminution. Plaintiffs seek compensatory and punitive damages.

Count VI — Civil Conspiracy (Derivative) (All Defendants)

36. Plaintiffs incorporate paragraphs 1–29. Defendants combined, agreed, and acted in concert to accomplish the underlying torts alleged herein or to accomplish lawful objectives by unlawful means. Overt acts include: recharacterizing a documented accident as criminal conduct to manufacture order violations; coordinating creditor contacts to trigger defaults; timing filings to gag petitioning; fabricating or exaggerating evidence; and intimidating counsel and witnesses. Each conspirator is jointly and severally liable for all damages flowing from the underlying torts.

Count VII — Aiding and Abetting / Concert of Action (Derivative) (All Defendants)

37. Plaintiffs incorporate paragraphs 1–29. Each Defendant knowingly and substantially assisted, encouraged, or participated in the commission of the underlying torts. Such assistance was a substantial factor in causing Plaintiffs' injuries. Joint and several liability attaches for all damages caused by the underlying torts.

Count VIII — Professional Negligence (Legal Malpractice) (Against Alan David Abrams, Esq.)

Jackson, contemporaneous legal advice during incarceration concerning creditor issues, and acceptance/handling of Jackson's funds for payment of creditors, an attorney–client relationship existed, implied from conduct.

39. As Jackson's attorney in these matters, Abrams owed the duty to exercise the knowledge, skill, and care ordinarily possessed and exercised by lawyers in similar circumstances, including diligent, conflict-free, competent handling of entrusted funds and creditor communications.

40. Abrams breached the standard of care by, inter alia: mishandling entrusted funds; failing to segregate and promptly remit; failing to provide timely accounting; engaging in imprudent or misleading creditor communications while acting as counsel/agent; and undertaking actions/omissions below the standard of care that foreseeably harmed Jackson's legal and financial position.

41. As a direct and proximate result, Jackson suffered actual losses, including late fees, penalties, increased interest/costs of credit, derogatory credit reporting and score decline, lost business and financing opportunities, and remediation costs. Plaintiffs seek compensatory damages, pre- and post-judgment interest, and costs.

Count IX — Breach of Fiduciary Duty; Accounting; Constructive Trust (Against Alan David Abrams, Esq.)

42. Plaintiffs incorporate paragraphs 1–29. By accepting and holding Jackson's funds to pay his creditors, Abrams acted as Jackson's fiduciary custodian and agent and, by conduct, as his attorney concerning the funds and related creditor communications. Abrams owed duties to segregate funds, maintain records, promptly notify and account, deliver funds to those entitled, and avoid conflicts of interest.

43. Abrams breached his fiduciary duties by failing to safeguard, account for, and properly disburse funds; by engaging in creditor communications contrary to Jackson's interests while holding the funds; and by failing to provide a timely, complete accounting.

44. As a proximate result, Plaintiffs suffered economic losses and related damages. Plaintiffs seek an accounting, imposition of a constructive trust over any misapplied funds or traceable proceeds, compensatory damages, and punitive damages as permitted.

Destroyed/Altered Material Evidence)

45. Plaintiffs incorporate paragraphs 1–29. Defendants were on notice of pending and potential civil actions, including upon receipt of Plaintiff's August 20, 2025 preservation letter (Exhibit L). Despite this notice, one or more Defendants destroyed, concealed, altered, or failed to preserve material evidence—including, without limitation, any communications, files, devices, recordings, or data concerning the alleged threat texts, the purported inculpatory video, creditor communications, hearing intimidation, or trust-account handling—with the intent of defeating Plaintiffs' claims or defenses.

46. The failure to preserve or the destruction/alteration of such evidence impaired the availability and integrity of material proof for use in official proceedings and caused prejudice to Plaintiffs. Plaintiffs seek all available spoliation remedies, adverse inferences, and compensatory damages.

Count XI — Concerted Witness Intimidation and Obstruction (Derivative) (All Defendants)

47. Plaintiffs incorporate paragraphs 1–29. Defendants engaged in concerted conduct to corruptly influence or intimidate witnesses and counsel, deter attendance or truthful testimony, and impair the availability or integrity of evidence, all in furtherance of the underlying torts.

48. Particulars include: (a) intimidation of subpoena-identified civilian witnesses (Arran Adams and Robert Brooks), causing refusal to testify; (b) a courthouse-hallway confrontation and threats to Plaintiff's counsel minutes before the June 10, 2025 hearing; (c) family-targeted intimidation and defamation to deter attendance by Plaintiff's mother and to alienate Plaintiff's brother from assisting; (d) initiation acts and sworn statements materially contradicted by objective proof (forensic extraction disproving alleged threat texts; a purported inculpatory video never produced); and (e) coordinated, retaliatory timing of filings and extra-judicial pressure, including creditor interference timed to obstruct home confinement.

49. This misconduct supplies the ulterior purpose and willful improper-use elements for abuse of process; the malice and lack-of-probable-cause elements for malicious prosecution; the outrageousness element for IIED; improper means for tortious interference; overt acts for conspiracy and aiding-and-abetting; and supports spoliation inferences and punitive damages.

remedies available for obstruction and spoliation.

Reservation of Product/Warranty/Personal-Injury Claims

51. Plaintiffs expressly reserve, and do not plead or seek adjudication in this action of, claims for strict products liability, negligent design/manufacture/warning, negligent repair/undertaking, breach of express or implied warranties, consumer warranty remedies, lemon-law remedies, breach of contract, or gross negligence causing bodily injury arising from the subject vehicle. Those claims will be prosecuted separately against appropriate parties. Nothing herein adjudicates or defends those claims.

Damages

52. Plaintiffs seek general damages for reputational harm (Jackson and Amplius) and severe emotional distress (Jackson); special damages for economic losses including fees, charges, increased borrowing costs, lost financing and customers, repossession risks, and enterprise-value diminution (Amplius); punitive damages for willful, wanton, and malicious conduct; equitable relief including an accounting and constructive trust; pre- and post-judgment interest; costs; and such further relief as the Court deems just and proper.

Entity vs. Individual Damages and Standing

53. Plaintiff Jackson pleads personal damages; Amplius Holdings, LLC alleges direct harms to the business and its d/b/a operations. Plaintiffs will ensure the LLC appears by licensed counsel and, if necessary, clarify that business-enterprise damages are sought by the entity while preserving Jackson's direct personal damages to avoid duplication and ensure proper standing.

Plaintiff possesses evidence that needs sealed by court order

54. Plaintiff is in possession of 4 sworn affidavits which corroborate witness intimidation / tampering, however, Affiant's have requested that their identity's be kept confidential due to fear of retaliation by the Defendants. Plaintiff will submit motion to enter evidence under Court Seal. Additionally, Plaintiff possesses a total of 4 audio files and unredacted transcripts which corroborate other facts contained herein. Request is also being made by Motion to seal those as well. They will be accompanied by certification and verification with computed 256 and 512 hash tags and sworn declaration by custodian. Plaintiff also needs to file exculpatory video of

Plaintiffs demand trial by jury on all issues so triable.

DATED: October 6th , 2025

Respectfully submitted,



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