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 RESPONSE TO PLAINTIFF'S EMERGENCY OMNIBUS MOTION FOR (1) LEAVE TO FILE RENEWED DISQUALIFICATION MOTION OUT OF TIME, (2) PROTECTIVE AND SEQUESTRATION ORDERS; (3) PRECLUSION AND PROPORTIONATE SANCTIONS; (4) CANCELLATION OF RULE TO SHOW CAUSE PROCEEDING; AND (5) JUDICIAL NOTICE WITH CONSOLIDATED MEMORANDUM OF LAW

COMES NOW the Defendant, Alan David Abrams, with his Response to Plaintiff's Emergency Omnibus Motion for (1) Leave to File Renewed Disqualification Motion Out of Time, (2) Protective and Sequestration Orders; (3) Preclusion and Proportionate Sanctions; (4) Cancellation of Rule to Show Cause Proceeding; and (5) Judicial Notice with Consolidated Memorandum of Law, stating as follows:

1. It's a federal offense to knowingly make false statements, fail to disclose material facts, or otherwise misrepresent information to obtain SSI benefits. 42 U.S.C. § 1383a(a)(2).

2. This covers theft of government funds or property, which can apply to receiving SSI payments. 18 U.S.C. § 641.

3. From the documents discovered, it appears that the Plaintiff not only submitted a false indigency affidavit to this Court, which prompted the Defendant's investigation, but may have committed federal offenses with fines up to $250,000, imprisonment of up to five (5) years, and restitution of SSI benefits wrongfully received.

4. It appears that at the same time the Plaintiff was receiving SSI benefits, he was engaged in operating a limited liability company with assets valued at over $1 million and generally significant income.

5. As the Plaintiff's motion acknowledges, the subject SSI letter was "stored in the marital residence," where it was accessible to Sarah Abrams, who the Plaintiff is attempting to bring into this action through amended and supplemental complaints.

6. That the Plaintiff allegedly "never authorized anyone—including his spouse—to access[1] or disseminate the box contents" that included the SSI letter is irrelevant because there was no legal impediment to Ms. Abrams accessing the letter and disclosing it to third parties, which is why the Plaintiff cites no legal impediment.

7. The Defendant has already fully addressed the Plaintiff's motion to disqualify his counsel as such counsel has no conflict arising from the firm's representation of the Defendant in multiple suits.

8. The Plaintiff has not challenged the contents of the SSI letter, has admitted to receiving SSI benefits until the time of his incarceration, and has meekly defended himself by arguing that as of the moment he signed the indigency affidavit, he was not currently receiving SSI benefits, ignoring the undisputed fact that the indigency affidavit form required him to disclose "yearly" income, and to substantiate his blatantly false representation that his "yearly income" was "0."

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[1] As a purely factual matter, the Plaintiff's statement that, "My mother brought the box from Martinsburg" is false. The SSI letter was found in a safe inherited by Sarah Abrams from the Defendant's mother-in-law. Moreover, noticeably absent from the Plaintiff's filings are any description of how he allegedly secured the SSI letter because it was not secured. He had placed it in Sarah Abrams' safe in a residence they shared.

9. The Plaintiff has been caught with his hand in the Social Security Administration's cookie jar, and it takes considerable chutzpah for the Plaintiff to seek to disqualify counsel and exclude from this Court's consideration a virtual photograph of the Plaintiff caught in the act.

WHEREFORE, the Defendant, Alan David Abrams, respectfully requests this Court DENY the Plaintiff's Emergency Omnibus Motion for (1) Leave to File Renewed Disqualification Motion Out of Time, (2) Protective and Sequestration Orders; (3) Preclusion and Proportionate Sanctions; (4) Cancellation of Rule to Show Cause Proceeding; and (5) Judicial Notice with Consolidated Memorandum of Law.

ALAN DAVID ABRAMS

By Counsel

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IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA

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Judge Poling

DEFENDANT'S RESPONSE TO PLAINTIFF'S NOTICE OF SUBSEQUENT DEVELOPMENTS REGARDING APPEARANCES OF COUNSEL

COMES NOW the Defendant, Alan David Abrams, with his Response to Plaintiff's Notice of Subsequent Developments Regarding Appearances of Counsel, stating as follows:

1. The Plaintiff has filed a motion to disqualify the Defendant's counsel, the law firm of Steptoe & Johnson PLLC, because that firm represents the Defendant in two separate matters, which obviously creates no conflict.

2. In the "Notice" filed by Plaintiff, he references lawyers at a completely different firm, Pullin, Fowler, Flanagan, Brown & Poe, PLLC.

3. The "Notice" does not explain why the Plaintiff's grievances against the firm Pullin, Fowler, Flanagan, Brown & Poe, PLLC, create some conflict on the part of the firm, Steptoe & Johnson PLLC, because it does not.

4. The only connection that is apparent from the "Notice," is that like in this case, the Plaintiff has moved to disqualify the firm, Pullin, Fowler, Flanagan, Brown & Poe, PLLC, in a different case, just as he has done in other cases against other attorneys.

WHEREFORE, the Defendant, Alan David Abrams, respectfully requests this Court DENY the to Plaintiff's Notice of Subsequent Developments Regarding Appearances of Counsel.

IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA

CHRISTOPHER ADAM JACKSON,

Plaintiff,

v.

ALAN DAVID ABRAMS,

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Civil Action No. 25-C-328
Judge Poling

DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL COMPLAINT

COMES NOW the Defendant, Alan David Abrams, with his Response to Plaintiff's Motion for Leave to File Supplemental Complaint, stating as follows:

1. There is no civil rule that permits the filing of a "Supplemental Complaint."

2. The original complaint is based on a personal safety proceeding.

3. The "Supplemental Complaint," which is only a partial document, references an insurance claim by Sarah Abrams, who is not a party to this litigation.

4. The "Supplemental Complaint" identifies no discrete cause of action.

5. Accordingly, like Plaintiff's prior efforts to amend his original complaint, it is defective on its face.

WHEREFORE, the Defendant, Alan David Abrams, respectfully requests this Court DENY the Plaintiff's Motion for Leave to File Supplemental Complaint.

ALAN DAVID ABRAMS

By Counsel

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 RESPONSE TO PLAINTIFF'S MOTION TO STAY PROCEEDINGS PENDING RELATED FEDERAL ACTION OR, IN THE ALTERNATIVE, TO CONVERT THE NOVEMBER 5 SCHEDULED HEARING TO A STATUS CONFERENCE AND CONTINUE FOR 60 DAYS

COMES NOW the Defendant, Alan David Abrams, with his Response to Plaintiff's Motion to Stay Proceedings Pending Related Federal Action or, in the Alternative, to Convert the November 5 Scheduled Hearing to a Status Conference and Continue for 60 Days, stating as follows:

1. The Plaintiff's statement that, "This state arises from the same core facts and participants implicated in Plaintiff's federal civil-rights action pending in the United States District Court for the Southern District of West Virginia (Beckley Division), Case No. 5:25-cv-00534" is patently false.

2. This Court can take judicial notice of the docket sheet in Case No. 5:25-cv-00534 and confirm that neither the Defendant nor any of the other parties the Plaintiff seeks to add to this case are parties in that litigation. Exhibit A.

3. Also, as the Court can see from the docket sheet, the Plaintiff's motion to amend his federal complaint has not been granted, and the proposed amended complaint does not

specifically reference the personal safety proceeding which is the gravamen of the Plaintiff's original complaint in this proceeding. Exhibit B.

4. Perhaps it can be understandable that the Plaintiff has lost the thread of what this case was originally about as he has filed in multiple courts, including this one, a flurry of pleadings listing a cornucopia of grievances against dozens of individuals, including judges, attorneys, witnesses, state agencies, municipalities, police officers, correctional officers, healthcare providers, car manufacturers, car dealerships, dealership employees, and others.

5. If the Plaintiff wants to abandon this case in favor of federal court, then his remedy is a Rule 41 voluntary dismissal as the Defendant's motion to dismiss is still pending.

6. Indeed, his motion states, "One forum and one operative complaint will prevent duplicative discovery, motion practice, and evidentiary disputes over the same documents, witnesses, and privilege questions."

7. If the Plaintiff is unwilling to voluntarily dismiss this action, however, by the November 5, 2025, hearing scheduled, his Motion to Stay should be denied because (a) the Defendant's motion to dismiss has been fully briefed and is ripe for decision; (b) the Defendant's motion for a rule to show cause has been fully briefed and is ripe for decision; and (c) the Plaintiff's various motions to amend his complaint have been fully briefed and are ripe for decision.

WHEREFORE, the Defendant, Alan David Abrams, respectfully requests this Court DENY the Plaintiff's Motion to Stay Proceedings Pending Related Federal Action or, in the Alternative, to Convert the November 5 Scheduled Hearing to a Status Conference and Continue for 60 Days.