



IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

2023 APR 25 PM 2:13

CLERK OF COURT
CUYAHOGA COUNTY

CATHERINE M STARK ET AL	)	CASE NO.: CV 22 969917
	)	
Plaintiff,	)	
	)	JUDGE: BRENDAN J SHEEHAN
v.	)	
	)	
WILLIAM EASTON HORNER ET AL	)	<u>DEFENDANT'S SUPPLEMENTAL</u>
	)	<u>DISCLOSURES</u>
Defendant,	)	

Now comes Defendant, William Horner, by pro se representation and hereby makes the following supplemental disclosures pursuant to Ohio Civ. R. 26(B)(3) based upon the information reasonably available to Defendant at this time. This supplemental disclosure is necessary due to the limited discovery propounded to Defendant in this matter by Plaintiff.

(a)(i): Persons likely to have discoverable information.

1. Cristy Miller, FBI special operations (Ret.)
2. Richard Burchill.
3. Kathy Horner
4. Other persons for the purposes of presenting evidence and damages.

(a)(ii) Documents and other things

5. Documents obtained from Defendant's former website rights4fathers.com.
6. Documents submitted by Defendant in Cuyahoga County Court of Common Pleas General Division and Domestic Relations Division.
7. Documents submitted by Defendant in the Eighth District Court of Appeals.

8. Documents submitted by Defendant in the Ohio Supreme Court.
9. Other documents provided by Plaintiff to Defendant and/or obtained by Defendant with Plaintiff's permission.
10. Other documents provided to Defendant by Christopher Wray, FBI Director, in relations to Defendant's Federal Minuteman investigation.

(a)(iii): Damages.

11. Emotional damages, including the cost of therapy and related medications, in excess of \$10,000, which are ongoing and continuous.
12. Economic damages, including the costs incurred in ensuring Defendant's safety, lost wages and promotion opportunities, lost business opportunities, costs to go before the US Congress alongside Christopher Wray, FBI Director, to remove Defendant's name from federal terrorist watch lists, attorney's fees, costs, and expenses in excess of \$3.5 million which are ongoing.

Wherefore, William Horner, by pro se representation, hereby makes the following supplemental disclosures pursuant to Ohio Civ. R. 26(B)(3) based upon the information reasonably available to Defendant at this time. This supplemental disclosure is necessary due to the limited discovery propounded to Defendant in this matter by Plaintiff.

Respectfully Submitted,

William E. Horner

Date: 4/17/2023

William E. Horner

2899 Blue Ridge Drive

Morristown, TN 37814

(865) 322-9331

williamehorner@gmail.com

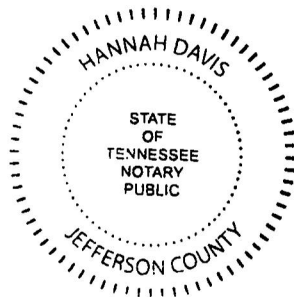
Defendant

State of Tennessee

County of Jefferson

William Easton Horner subscribed and sworn to (or affirmed) before me this 17th day of

April in the year 2023 of our Lord.



Hannah Davis (SEAL)

Signature of Notary Public

7/12/25 Commission Expires

DEFENDANT AFFIDAVIT

This motion, and its contents, represent the truth, the whole truth, and nothing but the truth, to the best of my knowledge, and I swear to its validity under penalty of perjury through affixing my signature and seal.

William Easton Horner (SEAL)

4/17/2023 (Date)

William Easton Horner

2899 Blue Ridge Drive

Morristown, TN 37814

williamehorner@gmail.com

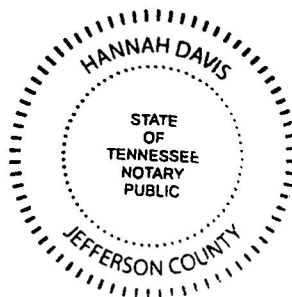
865.322.9331

Defendant, Pro Se

State of Tennessee

County of Jefferson

William Easton Horner subscribed and sworn to (or affirmed) before me this 17th day of April in the year 2023 of our Lord.



Hannah Davis (SEAL)

Signature of Notary Public

7/12/25 Commission Expires

CERTIFICATE OF SERVICE

A soft copy of the foregoing **DEFENDANT'S SUPPLEMENTAL DISCLOSURES** was served upon Daniel F. Gourash via email on 4/17/2023 at his indicated email address dfgourash@sseg-law.com.

A soft copy of the foregoing **DEFENDANT'S SUPPLEMENTAL DISCLOSURES** was served upon Amelia J. Leonard via email on 4/17/2023 at her indicated email address aleonard@sseg-law.com.

William E. Horner (SEAL)

4/17/2023 (Date)

William Easton Horner

2899 Blue Ridge Drive Morristown, TN 37814

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Defendant, Pro Se