



FILED

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

2023 MAY 12 A 11: 16

CLERK OF COURTS
CUYAHOGA COUNTY

CATHERINE M STARK ET AL

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CASE NO.: CV 22 969917

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Plaintiff,

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JUDGE: BRENDAN J SHEEHAN

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V.

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WILLIAM EASTON HORNER ET AL

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DEFENDANT'S MOTION FOR

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PLAINTIFF TO SHOW CAUSE

Defendant,

1

...AGAIN

Now comes Defendant, William Horner, by pro se representation and respectfully requests this honorable Court schedule pre-trial hearing via Zoom so that Plaintiffs may show cause as to why they shouldn't be held in contempt of court for perjury.

Defendant has previously challenged Plaintiffs with why they should not be held in contempt of court for explicitly lying to your Honor about having access to Defendant's text messages, Gmails, and other telecommunications. The rebuttal from Plaintiff was to then admit they did have access to Defendant's telecommunications, and then attempt to parse a word "**unauthorized**" to fool this court into believing Defendant had given Plaintiff access to his private digital communications and records.

"In or about March 15, 2018 while Mr. Horner and I lived as a married couple in Ohio, Horner installed the "Republic Anywhere" App on my iPad. Mr. Horner told me that the Republic Anywhere App would allow me to access my text messages and other communications directly on my iPad. At the time Mr. Horner installed Republic Anywhere on my iPad, he also gave me direct access to his own text messags through the Republic Anywhere on my iPad." (Paragraphs 6-8 Affidavit of Ms. Allison Stark submitted in Plaintiffs original objection to show cause.)

As confirmed by the TMLS listing for our 21 Summerglen marital home (Exhibit A), Defendant was in fact located in Durham, NC on March 15, 2018, **not Ohio** as Plaintiff has sworn and therefore

could not have installed the Republic Anywhere App. Again, the Plaintiff is explicitly lying under oath to cover up her [REDACTED] behavior.

In an attempt to arrive at the truth in good faith, Defendant has filmed extensive video content where he directly goes through the recorded court documents, oaths, affidavits, etc. to demonstrate Plaintiff's documented crimes and lies. These videos have been sent to opposing counsel with good faith request for explanation. None has been given despite following the outlined protocols of Civ. Rule 37(A)(1). In fact, instead of working in good faith to complete discovery, opposing counsel has been working with the Clerk of Courts as well as the State Prosecutor's Office to pass forged signatures and trump up new bogus criminal arrest warrants. (Exhibit B CD ROM with forensic recordings.) The forensic videos are best viewed in reverse chronological order (newest to oldest) as your Honor will be able to watch [REDACTED].

In an attempt to arrive at the truth in good faith, Defendant has reached out to your Honor's staff attorney, Ms. Jayne Jakubaitis so that a discovery phone call/Zoom call could be scheduled. (Exhibit C). In that same communication, Defendant outlined how he and his amicus witness, Cristy Miller, are being actively retaliated against by the Director of the FBI, Christopher Wray, because of their refusal to remain quiet about his organization's interference in Defendant's cases including their expungement of the illegal probate warrant that had Defendant illegally incarcerated in St. Vincent's Charity Hospital. The reaction of Ms. Jakubaitis was to simply ignore the request.

Wherefore, William Horner, by pro se representation, respectfully requests this honorable Court schedule a pre-trial hearing via Zoom so that Plaintiffs may show cause as to why they shouldn't be held in contempt of court for perjury.

Respectfully Submitted,

William E. Horner

Date: 5/8/2023

William E. Horner

2899 Blue Ridge Drive

Morristown, TN 37814

(865) 322-9331

williamehorner@gmail.com

Defendant

State of Tennessee

County of Grainger

William Easton Horner subscribed and sworn to (or affirmed) before me this 8th day of

May in the year 2023 of our Lord.



Rebekah Hope Myers (SEAL)

Signature of Notary Public

3/12/25 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 E Horner (SEAL)

5/18/2023 (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 Grainger

William Easton Horner subscribed and sworn to (or affirmed) before me this 8th day of May in the year 2023 of our Lord.



Rebekah Hope Myers (SEAL)

Signature of Notary Public

3/12/25 Commission Expires

CERTIFICATE OF SERVICE

A soft copy of the foregoing **DEFENDANT'S MOTION FOR PLAINTIFF TO SHOW CAUSE...AGAIN** was served upon Daniel F. Gourash via email on 5/8/2023 at his indicated email address dfgourash@sseg-law.com.

A soft copy of the foregoing **DEFENDANT'S MOTION FOR PLAINTIFF TO SHOW CAUSE...AGAIN** was served upon Amelia J. Leonard via email on 5/8/2023 at her indicated email address aleonard@sseg-law.com.

A hard copy of the foregoing **DEFENDANT'S MOTION FOR PLAINTIFF TO SHOW CAUSE...AGAIN** was served upon Amelia J. Leonard via USPS mail on 5/8/2023 at her indicated office address.

William E Horner (SEAL)

5/8/2023 (Date)

William Easton Horner

2899 Blue Ridge Drive Morristown, TN 37814

willamehorner@gmail.com

865.322.9331

Defendant, Pro Se



Easton Horner <williamehorner@gmail.com>

Little bitches

Easton Horner <williamehorner@gmail.com>

Thu, May 4, 2023 at 10:17 AM

To: Jayne Jakubaitis <CP1JJ@cuyahogacounty.us>, "Daniel F. Gourash" <dfgourash@sseg-law.com>, "Amelia J. Leonard" <aleonard@sseg-law.com>

Cc: Brendan Sheehan <judgesheehan@gmail.com>, Top Dog <tdcommand1@gmail.com>, Cristy Miller <millerbug83@gmail.com>

Good Morning Jayne,

So according to Judge Sheehan's published workflows, discovery issues apparently need to be taken up with you. I was under the impression this was happening given Ms. Leonard and my rejuvenated dialog.

It seems instead however, that my PTSD suffering ex-wife who:

- 1) thinks I make threats of executing my children on my website,
- 2) had me [REDACTED] incarcerated in a mental institution, and
- 3) [REDACTED]

[REDACTED] to first trump up, then pass a forged signature through the CCCC criminal court and get issued a new Sherrifs warrant for my arrest.

I recognize it's not her fault Jayne. She suffers from PTSD. In fact I have serious ethical reservations about a hired gun attorney continuing to extract costs under such questionable circumstances. As officers of the court their sworn ultimate duty is to uphold the law garner backroom deals with Mr. O'Malley. Is this the "Good Faith" and "Abuse of Discovery Process" they were talking about that they say THEY need protections over?

And they call me a vicious litigator. LOL

Final thing. I've already come to Judge Sheehan about the "retaliation" (LOL) and witness tampering being waged against me and my amicus witness (emails forwarded from string below). You'll notice specifically the line about "keeping the secrets that 'need' keeping" around here and us "being too loud."

Specifically madam his organization's ghosting the probate warrant records Judge Sheehan now can't find. Your Judge Sheehan will also rember the stolen millions dollars we reported to him in the initial witness tampering sworn testimony.

I recognize I am not an attorney madam, and you in fact are. You do what you feel is best. Just know you will be cited directly at federal proceedings. I would think a Zoom call with Judge Sheehan would be warranted.

Kind Regards and Humble Respect,
Easton Horner, Attorney Pro Se

PS. Please forgive what I know madam stark will consider aggressive titles. They are in fact specifically coded; this was under classified security formatting for the federal minuteman litigation pending. Remember madam...I'm emulating Jesus in this theatrical production.

Why the 2nd Amendment Exists Part 1 of 2
<https://youtu.be/JriMgdb9iJs>

Why the 2nd Amendment Exists Part 2 of 2
<https://youtu.be/Pkw3FniyouM>

CC: FBI Dir. Christopher Wray (aka Top Dog)
[Quoted text hidden]

Exhibit
C



Easton Horner <willamehorner@gmail.com>

Little bitches

Easton Horner <willamehorner@gmail.com>

Tue, May 2, 2023 at 4:36 PM

To: Top dog <tdcommand1@gmail.com>

Cc: cristy miller <millerbug83@gmail.com>

LOLOLOLOLOL

I love the we would be great candidates except we talk to much. Who here remembers the species 8472 email and going before Congress telling them how humble and discrete I am?

You don't want to email me I'm sure as the director of the FBI you can setup a firewall. But be advised if you do you'll probably miss some service motions for the federal court I'm about to haul you onto.

You can talk through email or I'll drag you in front of the Eastern district Federal Judge and we can talk in front of him.

Choose wisely Fido. And I hope you enjoy your continued ass whipping. #50to1

Munch Munch Munch

T3RMITE

[Quoted text hidden]



Easton Horner <willamehorner@gmail.com>

Little bitches

Top dog <tdcommand1@gmail.com>

Tue, May 2, 2023 at 3:25 PM

To: cristy miller <millerbug83@gmail.com>, Easton Horner <willamehorner@gmail.com>

Ms. Miller,

You really do like to get drunk and spill your guts! I hope it's worth it to you though! I haven't sold any secrets to BRICS despite what you think you know. I suppose given the fact that you don't work for the government anymore you should be careful just what accusations you make. I would truly hate for it to seem like treason! Have a wonderful day!

Mr. Horner,

I could care less what you think you have that ex batch of yours. I have far more pressing matters to tend to. If you could keep your mouth and the little bit he's mouth shut the two of you would make perfect candidates for the project. You both like to talk way too much. It's all about keeping the secrets that need keeping around here. So please stop bothering me every day!

A.