

STATE OF NORTH CAROLINA
HAYWOOD COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO: 18 CVS 116

FILED

2018 APR -5 PM 12: 02

HAYWOOD COUNTY, C.S.C.

DEBORAH KING,

Plaintiff,

v.

HAYWOOD REPUBLICAN ALLIANCE,
A Non-Incorporated Political Action
Committee, and RICHARD OWEN WEST,
individually and as Treasurer of HAYWOOD
REPUBLICAN ALLIANCE, JEREMY DAVIS,
individually, and as Chairman of the HAYWOOD
REPUBLICAN ALLIANCE and EDDIE CABE,
individually and as Member of the HAYWOOD
REPUBLICAN ALLIANCE, and JOHN DOE
1 THROUGH 6

Defendant(s),

ANSWER TO DEFENDANT
A.E. CABE'S
REQUEST FOR ADMISSIONS

NOW COMES the Plaintiff, Deborah King, by and through her undersigned attorney, and for response to Defendant A.E. Cabe's Request for Admissions states as follows:

1. Admit that your suit is not yours alone but is driven by your associates in the HCGOP, persons in the 11th District GOP as well as officers in the NCGOP, Raleigh.

Response: Denied

2. Admit that you have and are accepting contributions from others to fund your lawsuit as well as relying on their rumors, hearsay, innuendo and matters unknown to fuel your campaign.

Response: Denied

3. Admit that our sole purpose by initiation this suit is to divest the Defendants of all assets; and shut down the Haywood Republican Alliance.

Response: Denied

4. Admit that you, at meeting of the HCGOP, did in the presence of others, defame, slander and vilify the three individual defendants and/or other members of the Haywood Republican Alliance.

Response: Denied

5. Admit that you waited until the 6th of March, 2018 to bring this action just before the Haywood Convention just to embarrass the Haywood Republican Alliance members and inflate your own HCGOP.

Response: Denied

6. Admit that your secondary objective of the legal action is to impose on the defendants the identical defamatory measures that you falsely allege against them;

Response: Denied

7. Admit that you consulted with one or more of the leadership of the 11th District GOP about the matters that you allege in your complaint.

Response: Denied

8. Admit that you have during your husband's three campaigns for county commissioner carried, made, encouraged harsh, untrue, and demeaning language about opponents to be placed on placards and signs and publically displayed.

Response: Denied

9. Admit that you with other HCGOP officers at the Haywood County GOP convention in 2017 solicited, transported, cajoled and totally controlled the voting selections of almost everyone, including a number of elderly persons who had not attended a meeting in many years and were not in possession of their faculties, solely to vote out many members of the Haywood GOP Executive Committee.

Response: Denied

10. Admit that you and Lynda Bennett conspired to conduct the activities outlined in question 9 above as well as print out voter cheat sheets with the sole purpose of eliminating everyone from the Haywood GOP that would not vote your way.

Response: Denied

11. Admit that you consulted, advised and encouraged the NCGOP officers to impose severe sanctions on the undersigned, Jeremy Davis, Richard West and Monroe Miller, all Haywood Republican Alliance members, of restricting their rights to hold GOP offices and fully participate in GOP activities; having them banned from the republican party for a period of 5 years and having false "No Trespass orders" against the above named individuals drawn up by Thomas Stark chief legal counsel for the North Carolina Republican Party: all illegal under NC statutes.

Response: Denied

12. Admit that your actions for several years in politics have been devoted to eliminating any free thinkers from participating in GOP activities rather than opening the HCGOP to all who have the objective of improving the party.

Response: Denied

13. Admit that your thoughts, methods, actions and influence the past two years have been monopolized by your antipathy, malice, disdain, and extreme dislike for Jeremy Davis, Richard West, AE Cabe and Haywood Republican Alliance members; culminating in a lawsuit, unlike any successful or meritorious suit brought in North Carolina.

Response: Denied

14. Admit that you did not read or have read all of the allegations and statements made by your counsel in your complaint that you swore to.

Response: Denied

15. Admit that you are only after money, power, and control; and not any slighted feelings in these proceedings.

Response: Denied

16. Admit that the description of you as a timid, tender and inflective lady is a false representation of your character.

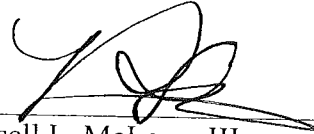
Response: Denied

17. Admit that the answers to these requests are not yours but your attorney's.

Response: Denied

This the 3rd day of April, 2018.

McLEAN LAW FIRM, P.A.



Russell L. McLean, III
P. O. Box 4
Waynesville, NC 28786
Tel: (828) 452-2896
Fax: (828) 356-6517

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Answer to Defendant AE Cabe's Request for Admissions by placing a copy of same in the U.S. mail, properly addressed and postage prepaid upon the following:

Arnold E. Cabe
13 Haven Place
Canton, NC 28716

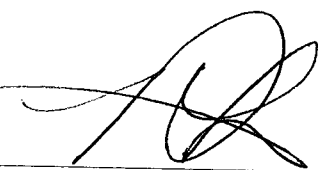
C. Amanda Martin
Attorney for Defendants
1101 Haynes Street, Suite 100
Raleigh, NC 27604

Haywood Republican Alliance
Richard Owen West
561 Westwood Circle
Waynesville, NC 28786

Jeremy Davis
127 Rebel Ridge Road
Canton, NC 28716

FILED
2018 APR -5 PM 12:02
JAYWOOD COUNTY, C.S.C.
qy _____

This the 5th day of April, 2018.



Russell L. McLean, III
P.O. Box 4
Waynesville, NC 28786
Phone: (828) 452-2896
Fax: (828) 356-6517

STATE OF NORTH CAROLINA
HAYWOOD COUNTY

FILED

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

FILE NO: 18 CVS 116

2018 APR -5 PM 12: 10

HAYWOOD COUNTY, C.S.C.

DEBORAH KING,

Plaintiff,

v.

HAYWOOD REPUBLICAN ALLIANCE,
A Non-Incorporated Political Action Committee,
and RICHARD OWEN WEST, individually and
as Treasurer of HAYWOOD REPUBLICAN
ALLIANCE, JEREMY DAVIS, individually, and
as Chairman of the HAYWOOD REPUBLICAN
ALLIANCE and EDDIE CABE, individually and
as Member of the HAYWOOD REPUBLICAN
ALLIANCE, and JOHN DOE 1 THROUGH 6

Defendant(s),

BY RT

**ORDER FOR EXTENSION
OF TIME**

FOR GOOD CAUSE shown and upon Plaintiffs' Motion for Extension of Time, the Court hereby grants an enlargement of time of (30) days to and including the 9th day of May, 2018, in which to prepare and serve a Answers to Defendant's First Set of Interrogatories and Request for Production of Documents in the above entitled action.

This the 05th day of April, 2018.

Myannah (asst)
CLERK OF COURT

STATE OF NORTH CAROLINA
HAYWOOD COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

FILE NO: 18 CVS 116

2018 APR -5 PM 12:01

HAYWOOD COUNTY, C.S.C.

DEBORAH KING,

Plaintiff,

v.

HAYWOOD REPUBLICAN ALLIANCE,
A Non-Incorporated Political Action Committee,
and RICHARD OWEN WEST, individually and
as Treasurer of HAYWOOD REPUBLICAN
ALLIANCE, JEREMY DAVIS, individually, and
as Chairman of the HAYWOOD REPUBLICAN
ALLIANCE and EDDIE CABE, individually and
as Member of the HAYWOOD REPUBLICAN
ALLIANCE, and JOHN DOE 1 THROUGH 6

Defendant(s),

MOTION FOR EXTENTION OF TIME
TO ANSWER DEFENDANT'S
FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION
OF DOCUMENTS

NOW COMES the Plaintiff, Deborah King, by and through her undersigned attorney, and moves the Court for an enlargement of time of thirty (30) days from and after the 9th day of April, 2018, to and including the 9th day of May, 2018, in which to prepare and serve a response to the Interrogatories and Request for Production of Documents served on March 6, 2018, in the above entitled action and respectfully shows the court that the time in which to respond has not yet expired and that Plaintiff is in need of additional time in which to complete information necessary to respond to the said Interrogatories and Request for Production of Documents.

WHEREFORE, Plaintiff requests that the Court grant an extension of time to prepare and serve a response to Defendant's First Set of Interrogatories and Request to Production of Documents to and including the 9th day of May, 2018.

This the 3rd day of April, 2018.

McLEAN LAW FIRM, P.A.



Russell L. McLean, III
P. O. Box 4
Waynesville, NC 28786
Tel: (828) 452-2896
Fax: (828) 356-6517

FILED

2018 APR -5 PM 12:01
WAYWOOD COUNTY, N.C.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Motion by placing a copy of same in the U.S. mail, properly addressed and postage prepaid upon the following:

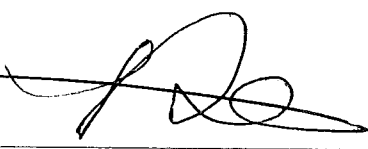
Arnold E. Cabe
13 Haven Place
Canton, NC 28716

C. Amanda Martin
Attorney for Defendants
1101 Haynes Street, Suite 100
Raleigh, NC 27604

Haywood Republican Alliance
Richard Owen West
561 Westwood Circle
Waynesville, NC 28786

Jeremy Davis
127 Rebel Ridge Road
Canton, NC 28716

This the 4th day of April, 2018.



Russell L. McLean, III
P.O. Box 4
Waynesville, NC 28786
Phone: (828) 452-2896
Fax: (828) 356-6517

SERVICE NOTICE

FILED

2018 APR -4 PM 4:07

HAYWOOD COUNTY, C.S.C.

BY *AT*
IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT
Civil Case 18CVS 116

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE,

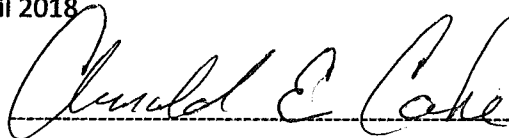
JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

PETITION FOR ATTORNEY'S FEES

On this 2nd day of April, 2018, a copy of attached PETITION FOR ATTORNEY'S FEES was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786. And Hand delivered to the Haywood County Clerk of Court.

PETITION FOR ATTORNEY'S FEES

On this 4TH Day April 2018



A.E. CABE, PRO-SE

A.E.CABE

13 Haven Place

Canton, N.C.28716

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

2018 APR -4 PM 4:08

HAYWOOD SUPERIOR COURT

HAYWOOD COUNTY, C.S.C.

CASE 18 CVS 116

BY _____

DEBORAH KING

vs

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST, A.E.CABE,

ET AL

PETITION FOR ATTORNEY'S FEES

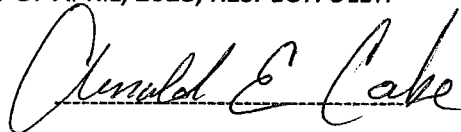
NOW COMES DEFENDANTS DAVIS, WEST and CABE AND INVOKE THE PROVISIONS of NCGS 6-19, regarding awarding of such fees in the event of a verdict for Defendants. Bolstering this statute is the fact that this politically instigated action is an absolute abuse of the legal process to settle personal grievances; such abuses of the court system are contrary to the expected conduct of both Parties. It is reasoned that the sole remedy for such egregious actions is a financial cost adjudged by the Court after the completion of the case, upon the guilty Party, the Plaintiff.

Since the final result of this case is uncertain, there is no reason for the Court's decision at this time.

WHEREFORE, DEFENDANTS PRAY THAT THIS HONORABLE COURT TAKE THIS REQUEST UNDER

ADVISEMENT; AND Grant Defendants such other and further relief as deemed proper.

SUBMITTED THIS 4th DAY OF APRIL, 2018, RESPECTFULLY.



A.E.CABE , PRO-SE

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Dallas Woodhouse
 NC Republican Party
 1506 Hillsborough St.
 Raleigh, NC 27605



9590 9402 3253 7196 6742 12

2. Tracking Number (Transfer from service label)

7017 0190 0000 7796 3445

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- Agent
- Addressee

B. Received by (Printed Name)

Catherine Whiteford

C. Date of Delivery

3-30-18

D. Is delivery address different from item 1?

Yes

If YES, enter delivery address below:

No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000

Domestic Return Receipt

FILED
 2018 APR -4 PM 4:09
 HAYWOOD COUNTY, C.S.C.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

THOMAS STARK
 STARK LAW GROUP
 6011 FARRINGTON RD Suite 300
 Chapel Hill, NC 27517



9590 9402 3253 7196 6742 29

2.

(for use from service label)
 7017 0190 0000 7796 3452

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

- Agent
- Addressee

B. Received by (Printed Name)

M. A. Long

C. Date of Delivery

3/29/18

D. Is delivery address different from item 1? If YES, enter delivery address below:

- Yes
- No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

FILED
 2018 APR -14 PM 4:09
 HAYWOOD COUNTY, C.S.C.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Robin Hayes Chair NCGOP
 NC Republican Party
 1506 Hillsborough ST.
 Raleigh, NC 27605



9590 9402 3253 7196 6742 36

2. Tracking Number (transfer from service label)

7017 0190 0000 7796 3469

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Agent

Addressee

B. Received by (Printed Name)

Catherine Whiteford

C. Date of Delivery

2-30-18

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below:

No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

FILED
 2018 APR -4 PM 4:09
 LAYWOOD COUNTY, C.S.C.
 BY _____

FILED

2018 APR -4 PM 4:10

HAYWOOD COUNTY, C.S.C.

Monroe A. Miller, Jr.
2200 Camp Branch Road
Waynesville, NC 28786
(828) 456-3718
March 31, 2018

The Grievance Committee
The North Carolina State Bar
208 Fayetteville Street
PO Box 25908
Raleigh, NC 27611
(919) 828-4620

BY _____

Subject: Complaint against Thomas H. Stark.

I, the undersigned hereby complain against

Mr. Thomas H. Stark, ID 10052
Stark Law Group, PLLC
6011 Farrington Rd., Ste. 300
Chapel Hill, NC 27517
Phone (919) 490-5550
Fax (919) 490-5551
License Date 08/22/1981
Status Active

I agree to cooperate by furnishing to the representatives of the North Carolina State Bar all pertinent information and records in my possession concerning the alleged misconduct of said attorney. I further agree that if a hearing or inquiry is ordered concerning the alleged misconduct of said attorney, then I will furnish evidence concerning the facts by submitting to deposition or personal attendance at the hearing or inquiry. I hereby indicate that this information is provided and transmitted by me to the North Carolina State Bar for the purpose of investigating the alleged misconduct of the above named attorney. I understand that I may also need to reveal this information to a privately-retained attorney to pursue private remedies on my behalf. I further understand that the immunity granted by North Carolina General Statute 84-28.2 applies only to those statements made without malice and intended for transmittal only to the North Carolina State Bar.

I also understand that the North Carolina State Bar may reveal this information to the accused attorney for his response to a formal inquiry and to others pursuant only to the Rules and Regulations of the North Carolina State Bar.

The information in this complaint raises questions of whether Mr. Stark violated the North Carolina Rules of Professional Conduct, as more specifically set forth herein, or in the alternative, whether Mr. Stark exhibited bias and a conflict of interest which significantly impaired his professional judgement, performance and competency as an attorney, and whether Mr. Stark had engaged in conduct which is contemptuous and considered contrary to community standards of justice, honesty, or good morals, in attempting to embarrass, delay or burden me, as a third party, and prevent me from my duties as a lawfully elected Precinct Chair of the Allens Creek Precinct in Haywood County.

RULE 4.4: RESPECT FOR RIGHTS OF THIRD PERSONS

(a) In representing a client, a lawyer shall not use means that have no substantial purpose other than to embarrass, delay, or burden a third person, or use methods of obtaining evidence that violate the legal rights of such a person.

A. BACKGROUND INFORMATION

Certain factions within the HCGOP organization had become dissatisfied, which I will label Establishment vs. Conservatives. The Establishment group started plotting to vanquish the Conservative Group.

Exhibit 1, dated 1/11/2017, is my unofficial roll call of Officers and Precinct Chairs (and Vice Chairs), all voting members.

HCGOP held Precinct Meetings on 2/4/2017. It was at these precinct meetings that Ken Henson, Debbie King, Lynda Bennett and Pat Carr orchestrated a take-over of most of the Precinct Chairs and Vice Chairs. I, and two other people, Jonnie Curie and Barbara Buck, remained as Precinct Chairs. This entitled all three of us to remain voting members at HCGOP Executive Committee meetings. During the actual precinct meetings, "recommended" voting guides were distributed by Lynda Bennett. **Exhibit 2** shows the "recommended" voting guide for Allens Creek. I am not even on the recommended list, but I managed to obtain the most votes for Precinct Chair.

Exhibit 3 is an announcement for the 2017 HCGOP Party Convention. Tom Stark attended this convention, and provided legal / parliamentary guidance during this convention. It was at this convention that Kevin Ensley [RINO], motioned a slate of officers to be nominated, and Pat Bennett, Lynda Bennett's husband, motioned to close the nominations, and boom! It was done. Michele Nix, NCGOP Vice Chair, also in attendance, indicated she had no problem with this sneaky procedure.

There was considerable discourse over social media after the convention, aimed at several people. Ousted HCGOP members formed a new organization, The Haywood Republican Alliance . HCGOP members prevailed upon Tom Stark to write several letters - NOTICE OF TRESPASS, ALL NORTH CAROLINA REPUBLICAN PARTY PROPERTIES AND EVENTS.

Exhibit 4 is such a Notice to Jeremy Davis, aimed at preventing Jeremy Davis and Eddie Cabe from attending the Republican State Party Convention, June 2-4, 2017.

Jeremy Davis conferred with the Haywood County Sheriff's Department, and Jeff Haynes, Chief of Deputies, indicated that the Sheriff's Department would not enforce this threat, i.e. NOTICE OF TRESPASS.

An HCGOP meeting was held on 7/13/2017 at the Juke Box Junction. Notes and minutes are contained in **Exhibit 5**. On the advice of Tom Stark, HCGOP created a PETITION BY CERTAIN MEMBERS OF THE HAYWOOD COUNTY REPUBLICAN PARTY EXECUTIVE COMMITTEE, **Exhibit 6**. This was to be a special called meeting to be held on August 3, 2017, for the purpose of holding a hearing to remove me as Allens Creek Precinct Chair. Ted Carr handed me a personal copy of this Petition as I was exiting the meeting.

I received a NOTICE OF HEARING on 7/20/2017, **Exhibit 7**.

The Hearing was held on August 3, 2017. **Exhibit 8**. Tom Stark had dispatched a subordinate, John Lewis, to chair the meeting. **Exhibit 9**. There were two (2) Sheriff's Deputies at the meeting. I attempted to record the proceedings, but was escorted out of the meeting by Aubrey Woodard and the two Sheriff's Deputies. The reason - Trespass. I was not allowed to attend any portion of this "fair and open hearing". The result of this hearing (hearsay), is that I was removed from my duly elected position of Allens Creek Precinct Chair.

I did have my recorder running at the beginning of the meeting, and captured the minute and half or so of my interaction with Aubrey Woodard (District 11 Chair) and Haywood County Sheriff's Deputies. **Exhibit 10.**

I did not, nor after multiple repeated attempts, nor have ever been provided written notice of the results of this "fair and open hearing". This forms the beginning basis for my multiple e-mails to HCGOP / District 11 / NCGOP in obtaining such written notice, and ultimately, the basis for Tom Stark sending me a NOTICE OF TRESPASS, dated 3/20/2018. To this day, I have not seen any of the charges that were presented at that hearing.

I then received a letter from Tom Stark, dated 9/28/2017, **Exhibit 11**, informing me and four other Haywood County Republicans, of Party Disloyalty. These charges would be brought up at the upcoming NC Republican Party Executive Committee meeting in Cary on 11/11/2017.

I subsequently received an extensive packet of CONFIDENTIAL INFORMATION to be presented at the meeting. **Exhibit 12.** One of the documents contained in the packet was a RESOLUTION ADOPTED BY THE EXECUTIVE COMMITTEE OF THE NORTH CAROLINA 11TH DISTRICT REPUBLICAN PARTY. It was blank, i.e., there were no signatures. I did not, nor after multiple repeated attempts, nor have ever been provided with any copies of this resolution that were actually signed by anyone. This forms a continuing basis for my multiple e-mails to HCGOP / District 11 / NCGOP in obtaining such proof that this resolution was actually signed by anyone, and ultimately, the basis for Tom Stark sending me a NOTICE OF TRESPASS, dated 3/20/2018. To this day, I have not seen any resolution by the 11th district that had been signed by anyone.

Furthermore, the Cary Executive Committee meeting was under strict confidentiality. Rumors and hearsay indicated that I, Richard West and Eddie Cabe had been banned from Republican Party activity for five (5) years. Jeremy Davis was banned for three years, and Paul Yeager was not banned. I did not, nor after multiple repeated attempts, nor have ever been provided with any official notice that I had been banned from party activity for five years. This forms a continuing basis for my multiple e-mails to HCGOP / District 11 / NCGOP in obtaining such proof that I had indeed been banned, and ultimately, the basis for Tom Stark sending me a NOTICE OF TRESPASS, dated 3/20/2018. To this day, I have not seen any written notice that I have been banned for Five years.

On or about 11/14/2017, I began sending e-mails to various party officials, attempting to gain clarification of my status with the NC Republican Party. **Exhibit 13**, show e-mail dialog between 11/14/2017 - 3/21/2018.

The HCGOP held only a couple of Executive Committee meetings, but used any and every means possible to attempt to remove me or have me removed from attending these meetings. One meeting that I was asked to leave the meeting, was held on 11/6/2017 by a motion from Ted Carr. **Exhibit 14.** The minutes show two things:

- I was addressed as a guest, as: "Ch. Monroe Miller AC". Lynda Bennett had addressed me as the current Precinct Chair of Allens Creek.
- The minutes state: "Monroe Miller requested that the Decision be put into writing and sent to him". This was not the Decision about this meeting and why I was being thrown out, but I wanted it in writing that I was removed as Precinct Chair at the August 3, 2017 HCGOP "hearing".

Things came to a head with the e-mail dialog, when I was invited to attend the Haywood County Convention on 3/20/2018, with a special e-mail invitation from Ken Henson, HCGOP Chair to attend the convention. **Exhibit 15.** A particularly nasty response by Dallas Woodhouse finally prompted Tom Stark to issue me a NOTICE OF TRESPASS, EXHIBIT 16.

CONDUCT WHICH MAY SUPPORT IMPOSITION OF PROFESSIONAL DISCIPLINE.

The following conduct raises questions of whether Mr. Stark may have violated the North Carolina Rules of Professional Conduct, or in the alternative, whether Mr. Stark is exhibiting a bias or conflict of interest which significantly impairs his professional judgement, performance or competency as an attorney by use of means that have no substantial purpose other than to embarrass, delay, or burden a third person.

The NOTICE OF TRESPASS issued by Tom Stark, essentially the same notice that had been sent to Jeremy Davis and Eddie Cabe on 5/15/2017, accused me of *libel per se*. Libel, as I understand it, is where you write something false about someone else. Well, there is nothing in the e-mail dialog, on my website www.haywoodtp.net, or anywhere else that I have written libel. Stark has made a false accusation.

The NOTICE OF TRESPASS has not been issued by a judge. In my world, a lawyer can only express an opinion, it is the Judge that makes the Ruling. Tom Stark's letter is simply an opinion and a threat, and I don't appreciate threats.

The Haywood County Sheriff's Office had been apprised of the letters of NOTICE OF TRESPASS sent to Jeremy Davis and Eddie Cabe. The Sheriff, through the Chief of Deputies, Jeff Haynes, indicated that they would not enforce the NOTICE OF TRESPASS in Haywood County.

All throughout my e-mails to HCGOP, District 11 and NCGOP, the central theme repeated at nauseam, were questions related to the HCGOP "fair and open hearing" which allegedly removed me from my elected position as Allens Creek Precinct Chair, and the NCGOP hearing which allegedly convicted four of the five "HAYWOOD 5" of party disloyalty. Specifically, I asked for the following in a majority of my e-mail communications:

- Signed Resolutions from District 11, which should have been presented to the Executive Committee,
- Signed Resolutions from HCGOP, which should have been presented to the Executive Committee,
- An indication if you, Robin, knew how to use e-mail and were going to send the Haywood 5 notice that four of us have been banned and one had been dismissed,
- Could you have either Tom Stark or "Dallas Woodhouse here" send us a copy of the affidavit with the Notary Seal?,
- Can you urge Kebbie (i.e. Ken Henson and Debbie King) to send me an official notice from the "Fair and Open Hearing" HCGOP Kangaroo Court Closed Meeting of August 3, 2017, you know, the one you send John Lewis to chair the meeting,
- Your concurrence that Ken Henson should resign as HCGOP Chair for being a hypocrite regarding the Ted Carr fiasco of getting reimbursed for selling T shirts at the Haywood County Fair that he personally bought in advance.

In a particularly testy e-mail response from NCGOP Executive Director, Dallas Woodhouse, on 3/18/2018, EXHIBIT 13, copied to Tom Stark, is both an incoherent tantrum and threatening. Dallas Woodhouse said:

Miller: You are currently under a No Trespass Order than you are legally prevented from attending this or any other NCGOP event on properties we maintain and control.

You have no legal right to attend, no do we have any obligation to provide you anything and we will not be doing so. This as forwarded to the local authorities, is a legal notice for you to stay away from our

property. We have told you this many times before and you have been served legal notice via courier.

We are a private organization and have full control who is invited to our events and who is not.

You are not invited. You have been served multiple legal notices that you are banned. Should you defy these legally binding orders we will have you arrested.

You may also take this as legal notice that your continued emails to me, Chairman Hayes, our local and/or State Officers are not welcome and constitute harassment.

You are bound under multiple state and federal cyber-stalking and other laws to stop this. We have no desire to communicate with you on any matter, now or in the future.

We have met our legal obligation to inform you of this MULTIPLE times. We demand you leave us alone.

This is notice once again that you are to CEASE AND DESIST contacting myself, Robin Hayes, Michele Nix, any and all officers of the North Carolina and Haywood County Republican parties.

Should you not do so, we will seek a restraining order and work to have you prosecuted under the full extent of the law.

As the North Carolina Republican Party Executive Director, I have the legal authority on these matters as granted to me by the North Carolina Republican Party.

Once again, we demand that you stay away from our events and properties and leave us alone.

*Dallas Woodhouse
North Carolina Republican Party Executive Director.*

When advised that I had never received a No Trespass Order, Dallas Woodhouse continued the same day with another e-mail, again copying Tom Stark:

*If you have not received one. You will receive one
This week. And this is your final warning to stop
Contacting us.*

Sent from my iPhone

Tom Stark, who allegedly does not get paid for what he does for the NCGOP, was taunted by the Dallas Woodhouse tantrum to jump into a Bear Trap - SNAP! Tom Stark was ordered by this character Dallas Woodhouse, for the primary reason of preventing me from attending the HCGOP Executive Committee Meeting on 3/20/2018. Since this was being held in Canton, the NOTICE OF TRESPASS order would have been enforced by then Police Chief Brian Whitner, who has since resigned, not the Sheriff's Department.

https://www.themountaineer.com/news/whitner-s-final-bow/article_7798c750-334c-11e8-b986-87f00bd60c32.html

This NOTICE OF TRESPASS is an attempt to embarrass me, prevents and delays me from my legal responsibility of duties as Allens Creek Precinct Chair, and has placed a heavy burden upon me.

Tom Stark's conduct raises questions of whether Mr. Stark may have violated the North Carolina Rules of Professional Conduct, or in the alternative, whether Mr. Stark is exhibiting a bias or conflict of interest which significantly impairs his professional judgement, performance or competency as an attorney by use of means that have no substantial purpose other than to embarrass, delay, or burden a third person.

Monroe A. Miller Jr.
Monroe A. Miller Jr.
2200 Camp Branch Road
Waynesville, NC 28786
(828) 456-3718

[Notary Stamp Here]

Jurat

Signed and sworn before me Amir F. Reentry, on this day, the 2 day of April, 2018.

Signed: Amir F. Reentry

Printed: Amir F. Reentry

My commission expires on October 22, 2021

LIST OF EXHIBITS

1. HCGOP 2017 Executive Committee Members, 1/11/2017.
2. HCGOP Precinct Meeting Suggested Election Guide List, by Lynda Bennett, 2/4/2017.
3. HCGOP announcement for Republican Party Convention, 2/24/2017.
4. NOTICE OF TRESPASS, issued by Tom Stark to Jeremy Davis, 5/15/2017.
5. HCGOP Summary of Meeting July 13, 2017, 5/14/2017.
6. PETITION BY CERTAIN MEMBERS OF THE HAYWOOD COUNTY REPUBLICAN PARTY EXECUTIVE COMMITTEE, 5/13/2017.
7. NOTICE OF HEARING, 5/20/2017.
8. HCGOP Executive Committee Hearing, 8/3/2017.
9. John Lewis Bar Card information, chaired the 8/3/2017 "fair and open hearing".
10. Audio recording of my being thrown out of the "fair and open hearing", 8/9/2017.
11. Party Disloyalty Notice from Tom Stark, 8/28/2017.
12. NCGOP *CONFIDENTIAL COMMUNICATIONS* Office of NCGOP General Counsel. General Counsel Letter along with detailed packet of stuff, 11/8/2017.
13. E-mail dialog with HCGOP, District 11 and NCGOP, 3/27/2018.
14. Minutes from HCGOP Executive Committee Meeting on Nov. 6, 2017, 1/10/2018.
15. Invitation to attend the HCGOP Executive Committee Meeting, 3/15/2018.
16. NOTICE OF TRESPASS by Tom Stark, 3/20/2018.

SERVICE NOTICE

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD


IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT
Civil Case 18CVS 116

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE,

JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

FILED
2018 APR -2 AM 10:13
HAYWOOD COUNTY, C.S.C.
BY 

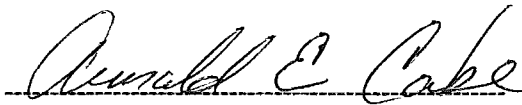
MOTION TO MAKE MORE DEFINITE

On this 2nd day of April, 2018, a copy of attached MOTION TO MAKE MORE DEFINITE was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786.

And Hand delivered to the Haywood County Clerk of Court.

MOTION TO MAKE MORE DEFINITE

On this 2nd Day April 2018



A.E. CABE, PRO-SE

A.E.CABE

13 Haven Place

Canton, N.C.28716

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

HAYWOOD SUPERIOR COURT

18 CVS 116

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST, A.E. CABE, ET AL

FILED
2018 APR -2 AM 10:13
HAYWOOD COUNTY, C.S.C.

MOTION TO MAKE MORE DEFINITE

NOW COMES DEFENDANT CABE ; DEFENDANT CABE SUBMITS TO THIS HONORABLE COURT some justification for his tardiness in bringing this matter up after time has elapsed, some authority holds, after the filing of Defensive Pleadings. However filing Pro Se does hamper one unlearned in the law and time was taken to acquaint myself by consulting others about the process of initiating a Defense. This Motion, where made now or in the trial, will serve to outline for myself and other Defendants, the precise allegations against each rather than as presently stated, especially in paras 10 thru 14, each Defendant committed each alleged act. We know that this is untrue and not factual.

Therefore, Defendant motions this Court to order the Plaintiff to assess by allegation each one's transgressions, omitting the inclusive words of "they", "them", "all", etc, being inclusive without justification or legal reasoning. The Plaintiff or her Counsel are aware of the incriminating nature of joining and implying equal concert between several who are solely joined by membership in the HAYWOOD REPUBLICAN ALLIANCE. The alternative is to sever my case from all the other Defendants. Pleadings can be corrected easily. This of course is more expensive for the Court and all Parties WHEN the simple remedy, if the Court pleases, is to mandate the requested changes.

WHEREFORE, DEFENDANT CABE PRAYS:

1. THAT this Motion be received by the Court with the humility in which it is offered ;
2. THAT complete consideration be given to the Defendant's failure to submit earlier;
3. That justice be done and Plaintiff be compelled to modify her pleadings to reflect the suggested changes; AND
4. That this Honorable Court grant such consideration as deemed appropriate.

Respectfully submitted this 2nd day of April 2018.

A handwritten signature in cursive script, reading "A.E. Cabe". The signature is written in black ink and is positioned above a horizontal line.

A.E.CABE, PRO SE

FILED

STATE OF NORTH CAROLINA
HAYWOOD COUNTY

2018 MAR 29

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

HAYWOOD COUNTY, C.S.C.
FILE NO: 18 CVS 116

BY RT

DEBORAH KING,
Plaintiff,

v.

HAYWOOD REPUBLICAN ALLIANCE,
A Non-Incorporated Political Action Committee,
and RICHARD OWEN WEST, Treasurer of
HAYWOOD REPUBLICAN ALLIANCE and
individually; JEREMY DAVIS, individually, and
as Chairman of the HAYWOOD REPUBLICAN
ALLIANCE and JOHN DOE 1 THROUGH 6
Defendant(s),

**MEMORANDUM IN
OPPOSITION OF DEFENDANT'S
MOTION TO DISMISS**

Plaintiff's law suit states a cause of action for invasion of privacy by appropriation of her name or license for a commercial use or benefit. The Plaintiffs also sought punitive damages and injunctive relief. The allegation in the complaint was that the Plaintiffs likeness was sold within a commercial setting without her consent. It is based upon this single tort that the Plaintiff has brought this action. It appears from the Defendants brief that they have missed the mark on what the complaint is about.

Each of the defendants Richard Owen, Jeremy Davis, and Eddie Cabe were sued in their individual capacities. The Plaintiff alleges and maintains that these men sold Kebbie Buttons at various activities in an around Haywood county including the hillbilly jam and other public venues within Haywood County for monetary benefit.

LEGAL ARGUMENT

Each of these individuals named in this as Defendants engaged in the activities complained of by only participating as members of Haywood Republican Alliance. These are the only individuals that the Plaintiff seeks recovery of for damages caused by the tort. Under the case of *Hien*

Nguyen v. Jayceon Taylor, et. al. 219 N.C. app 1, (2012) stands in support and on all fours with the cause of action asserted herein. Justice Calabria stated as follows: “ North Carolina recognizes a claim for invasion of privacy by means of “ appropriation, for the Defendants advantage, of Plaintiff’s name or likeness” *Renwick v. News and Observer Publishing Company*, 310 N.C. 312, 322,312 S.E. 2nd 405, 411 (1984).

In the *Nguyen* case cited above the Plaintiffs who are officers of the Greensboro Police Department arrested the Defendant Taylor for criminal trespass among other charges. An individual in Taylor’s entourage recorded the arrest. Thereafter, the defendant released a DVD and began an internet marketing service of his arrest. The Plaintiffs filed a complaint against Taylor and others including his publishing company among others for dissemination in the appropriation of the Plaintiffs likeness for commercial use. The Court went on to hold that his principal of appropriation for the Defendants advantage of the Plaintiffs likeness was a new field in legal juris prudence when the Court first addressed *Flake v. Greensboro News Company*, 212, N.C. 780, 195 S.E. 55 (1938). The cause of action asserted by the Defendant has developed as a result of the various decisions by our Courts over the last almost 50 years. As technology has developed the use of invasion of privacy claims, where if, a Defendant publishes an appropriation of a Plaintiff without their consent for money or advantage, the Plaintiff has such cause of action available in North Carolina.

North Carolina Rules of Pattern of Jury Instructions 800.75 sets forth the elements that must be found by the preponderance of the evidence by the trier of fact.

“did the Defendant appropriate the likeness of the Plaintiff for the Defendants own commercial use and benefit without the Plaintiff’s consent.

- (1) That the Defendant appropriated the Plaintiffs likeness for the Defendants own commercial use and benefit and
- (2) That the Plaintiff did not consent to the Defendants appropriation of her likeness.”

This is the cause of action set forth in the complaint filed in this matter in that the exhibits attached to the complaint set forth the locations of the commercial activity the number of Kebbie Buttons offered at the Haywood County Fair, the gun show where the Defendants attended with their Kebbie Buttons and that Eddie Cabe almost sold out of the Kebbie Buttons at the Hillbilly Jam in Maggie Valley to support the Plaintiffs allegation of her likeness being appropriated for Defendants and each of their own commercial use and benefit with Plaintiff’s consent.,

While the Defendants have attempted to couch this in a First Amendment issue, it is clear that this cause of action is not grounded in libel or slander and has no connection to any advertising purposes of any defamation of claim none of the Defendants have been sued for defamation or slander.

Respectfully submitted this the 29th day of March, 2018.

McLEAN LAW FIRM, P.A.



Russell L. McLean III
P.O. Box 4
Waynesville, NC 28786
Phone: (828) 452-2896
Fax: (828) 356-6517

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Memorandum by placing a copy of same in the U.S. mail, properly addressed and postage prepaid upon the following:

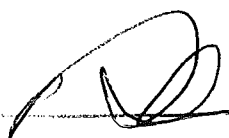
C. Amanda Martin
Attorneys for Defendants
1101 Haynes Street, Suite, 100
Raleigh, NC 27604

Arnold E. Cabe
13 Haven Place
Canton, NC 28716

Haywood Republican Alliance
Richard Owen West
561 Westwood Circle
Waynesville, NC 28786

Jeremy Davis
127 Rebel Ridge Road
Canton, NC 28716

This the 29th day of March, 2018.



Russell L. McLean, III
P.O. Box 4
Waynesville, NC 28786
Phone: (828) 452-2896
Fax: (828) 356-6517

SERVICE NOTICE

FILED

STATE OF NORTH CAROLINA

2018 MAR 28 AM 10:27

COUNTY OF HAYWOOD

HAYWOOD COUNTY, C.S.C.

DEBORAH KING

IN THE GENERAL COURT OF JUSTICE
BY
SUPERIOR COURT

VS

Civil Case 18CVS 116

HAYWOOD REPUBLICAN ALLIANCE,

JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

NOTICE OF REQUEST FOR ADMISSIONS

On this 28TH day of March, 2018, a copy of attached REQUEST FOR ADMISSIONS was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786. And Hand delivered to the Haywood County Clerk of Court.

NOTICE OF REQUEST FOR ADMISSIONS

On this 28th Day March 2018



A.E. CABE, PRO-SE

A.E.CABE

13 Haven Place

Canton, N.C.28716

STATE OF NORTH CAROLINA
DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE,

JEREMY DAVIS, A.E. CABE, RICHARD WEST, ET.AL

FILED

2018 MAR 28 AM 10:27

GENERAL COURT OF JUSTICE
HAYWOOD SUPERIOR COURT
HAYWOOD COUNTY, C.S.C.

BY _____

CASE 18CVS116

REQUEST FOR ADMISSIONS

NOW COMES Defendant A.E. Cabe in this request UP Article 36, N.C. Rules of CIVIL PROCEDURE AND SUBMITS HIS REQUEST FOR ADMISSIONS TO THE PLAINTIFF, to be answered within the period permitted by N.C. Statutes:

1. Admit that your suit is not yours alone but is driven by your associates in the HCGOP, persons in the 11th District GOP as well as officers in the N.C. GOP, Raleigh;
2. Admit that you have and are accepting contributions from others to fund your lawsuit as well as relying on their rumors, hearsay, innuendo and matters unknown to fuel your campaign;
3. Admit that your sole purpose by initiating this suit is to divest the Defendants of all assets; and shut down the Haywood Republican Alliance;
4. Admit that you at meetings of the HCGOP did in the presence of others, defame, slander and vilify the three Individual Defendants and/or other members of the Haywood Republican Alliance;
5. Admit that you waited until the 6th of March, 2018, to bring this action, just before the Haywood Convention JUST to embarrass the Haywood Republican Alliance members and inflate your own HCGOP.
6. Admit that your secondary objective of the legal action is to impose on the Defendants the identical defamatory measures that you falsely allege against them;
7. Admit that you consulted with one or more of the leadership of the 11th District GOP about the matters that you allege in your complaint;
8. Admit that you have during your husband's three campaigns for county commissioner carried, made, encouraged harsh, untrue, and demeaning language, about opponents, to be placed on placards and signs and publically displayed;

9. Admit that you with other HCGOP officers at the Haywood County GOP convention in 2017 solicited, transported, cajoled and totally controlled the voting selections of almost everyone, including a number of very elderly persons, who had not attended a meeting in many years And were not in possession of their complete faculties, solely, to vote out Many members of the Haywood GOP Executive Committee;

10. Admit that you and Lynda Bennett conspired to conduct the activities outlined in question 9 above; As well as print out Voter cheat sheets with the sole purpose of eliminating everyone from the Haywood GOP who would not vote your way.

11. Admit that you consulted, advised and encouraged the NCGOP Officers to impose severe sanctions on the undersigned, Jeremy Davis, Richard West and Monroe Miller, all Haywood Republican Alliance members, of restricting their rights to hold GOP offices and fully participate in GOP activities; having them banned from the Republican party for a period of 5 years , and having false "No Trespass orders" against above named individuals drawn up by Thomas Stark chief legal counsel for the North Carolina Republican Party: all illegal under N.C. statutes;

12. Admit that your actions for several years in politics have been devoted to eliminating any free thinkers FROM participating in GOP activities rather than opening the HCGOP to all who have the objective of improving the party;

13. Admit that your thoughts, methods, actions and influence the past two years have been monopolized by your antipathy, malice, disdain and extreme dislike for Jeremy Davis, Richard West, A.E. Cabe and Haywood Republican Alliance members; culminating in a lawsuit, unlike any successful or meritorious suit brought in the State of North Carolina;

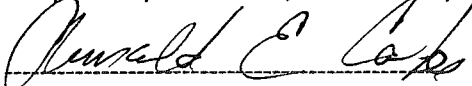
14. Admit that you did not read, or have read ALL of the allegations and statements made by your Counsel in your Complaint that you swore to:

15. Admit that you're only after money, power, and Control; and not any slighted feelings in these proceedings;

16. Admit that the description of you as a timid, tender and inflective lady is a false representation of your true Character;

17. Admit that the answers to these requests are not yours but your attorney's.

Respectfully Submitted, this 28th day of March 2018.

A handwritten signature in black ink, appearing to read "A.E. Cabe", written over a horizontal dashed line.

A.E. Cabe PRO-SE

SERVICE NOTICE **FILED**

2018 MAR 27 PM 1:42

HAYWOOD COUNTY, C.S.C.

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

BY _____ IN THE GENERAL COURT OF JUSTICE
~~SUPERIOR COURT~~

DEBORAH KING

Civil Case 18CVS 116

VS

HAYWOOD REPUBLICAN ALLIANCE,
JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

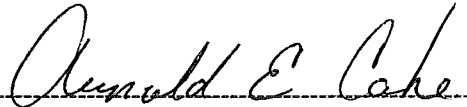
NOTICE OF SUBPOENA DUCES TECUM

On this 27TH day of March, 2018, a copies of attached, 5) SUBPOENA DUCES TECUM was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786. And Hand delivered to the Haywood County Clerk of Court, and sent by certified mail to each on the 5 listed below

- Robin Hayes, Chairman North Carolina Republican Party
- Michele Nix, Vice chair North Carolina Republican Party
- Dallas Woodhouse, Executive Director North Carolina Republican Party
- Thomas Stark, Chief Legal Counsel North Carolina Republican Party
- and
- Aubery Woodard, Chair of the 11th District North Carolina Republican Party

NOTICE OF SUBPOENA DUCES TECUM

On this 27th Day March 2018



A.E. CABE, PRO-SE

A.E.CABE
13 Haven Place
Canton, N.C.28716

011

STATE OF NORTH CAROLINA
 Haywood County
 FILED
 File No. 18-CVS-116
 In The General Court Of Justice
 District Superior Court Division

Deborah King
 Vice Chair Haywood GOP
 2018 MAR 27
 Additional File Numbers
 HAYWOOD COUNTY, C.S.C.

VERSUS
 Haywood Republican Alliance
 Jeremy Davis, Richard West,
 A.E. Cabe
 SUBPOENA
 G.S. 1A-1, Rule 45; G.S. 8-59

Party Requesting Subpoena
 State/Plaintiff Defendant
 NOTE TO PARTIES NOT REPRESENTED BY COUNSEL: Subpoenas may be produced at your request, but must be signed and issued by the office of the Clerk of Superior Court, or by a magistrate or judge.

TO Name And Address Of Person Subpoenaed
 THOMAS STARK
 6011 FARRINGTON RD SW #300
 Chapel Hill, NC 27517
 Telephone No.
 Alternate Address
 Telephone No.

YOU ARE COMMANDED TO: (check all that apply):
 appear and testify, in the above entitled action, before the court at the place, date and time indicated below.
 appear and testify, in the above entitled action, at a deposition at the place, date and time indicated below.
 produce and permit inspection and copying of the following items, at the place, date and time indicated below.
 See attached list. (List here if space sufficient)

See Attached: Subpoena Duces Tecum

Name And Location Of Court/Place Of Deposition/Place To Produce
 Superior Court, Haywood County
 Waynesville, NC
 Date To Appear/Produce
 April 10, 2018
 Time To Appear/Produce
 AM PM

Name And Address Of Applicant/Or Applicant's Attorney
 Arnold Cabe PRO-SE
 13 HAVEN PLACE
 CANTON, NC 28716
 Date
 3-27-2018
 Signature
 Arnold E. Cabe PRO-SE

Telephone No. Of Applicant Or Applicant's Attorney
 828-734-0422
 Deputy CSC Assistant CSC Clerk Of Superior Court Superior Court Judge
 Magistrate Attorney/DA District Court Judge

RETURN OF SERVICE

I certify this subpoena was received and served on the person subpoenaed as follows:
 By personal delivery. registered or certified mail, receipt requested and attached.
 telephone communication by Sheriff (use only for a witness subpoenaed to appear and testify).
 telephone communication by local law enforcement agency (use only for a witness subpoenaed to appear and testify in a criminal case).
 NOTE TO COURT: If the witness was served by telephone communication from a local law enforcement agency in a criminal case, the court may not issue a show cause order or order for arrest against the witness until the witness has been served personally with the written subpoena.
 I was unable to serve this subpoena. Reason unable to serve:

Service Fee \$ Paid Due
 Date Served
 Name Of Authorized Server (Type Or Print)
 Signature Of Authorized Server
 Title

NOTE TO PERSON REQUESTING SUBPOENA: A copy of this subpoena must be delivered, mailed or faxed to the attorney for each party in this case. If a party is not represented by an attorney, the copy must be mailed or delivered to the party. This does not apply in criminal cases.

Subpoena Duces Tecum

To: Thomas Stark , Chief Legal Counsel North Carolina Republican Party

You are directed no later than the 10th day of April, 2018 to deliver to the issuer of this Subpoena Duces Tecum,

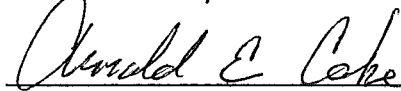
Any and all Audio recorded, video recorded, written and preserved in any retrievable form, whether in Email, typed, preserved or any retained form, any and all discussions, questions, comments and/or vocal, written or videotaped interactions in your possession, or retained on any personal or business computer used by you in the past 18 months concerning/about, relating to contacts with Deborah King, Vice Chair of Haywood County GOP, her immediate family, representative or agent, regarding Any Mention of the Haywood Republican Alliance, Eddie Cabe, Or any Aspect of her present lawsuit pending in Haywood Superior Court, against Haywood Republican Alliance, Eddie Cabe AKA A.E. Cabe Defendant in 12 CVS 116, in said court, Failure to obey this directive within the time allotted shall subject you to any punishment permitted by N.C. statutes. Return of requested documents may be by first class mail. If Desired the originator can prepare the copies for themselves/court.

Questions may be directed to Tel. 828-734-0422

Please send Requested Documents to:

A.E. Cabe
13 Haven Place
Canton, NC 28716

Sent this 27th Day of March 2018



A.E. Cabe PRO-SE

CM

STATE OF NORTH CAROLINA
 Haywood County
 FILED
 File No. 18-CVS-116
 In The General Court Of Justice
 District Superior Court Division

Deborah King
 Vice Chair Haywood GOP
 2018 MAR 27 PM
 Additional File Numbers
 HAYWOOD COUNTY, C.S.C.

VERSUS
 Haywood Republican Alliance,
 Jeremy Davis, Richard West,
 A.E. Cabe
 SUBPOENA
 G.S. 1A-1, Rule 45; G.S. 8-59

Party Requesting Subpoena
 State/Plaintiff Defendant
 NOTE TO PARTIES NOT REPRESENTED BY COUNSEL: Subpoenas may be produced at your request, but must be signed and issued by the office of the Clerk of Superior Court, or by a magistrate or judge.

TO Name And Address Of Person Subpoenaed
 Dallas Woodhouse, NC Republican Party
 1506 Hillsborough St.
 Raleigh, NC 27605
 Telephone No. 1-919-671-1050
 Alternate Address
 Telephone No. 1-919-828-6423 - Ex 139

YOU ARE COMMANDED TO: (check all that apply):
 appear and testify, in the above entitled action, before the court at the place, date and time indicated below.
 appear and testify, in the above entitled action, at a deposition at the place, date and time indicated below.
 produce and permit inspection and copying of the following items, at the place, date and time indicated below.
 See attached list. (List here if space sufficient)

See Attached: Subpoena Duces Tecum

Name And Location Of Court/Place Of Deposition/Place To Produce
 Superior Court Haywood County
 Waynesville, NC
 Date To Appear/Produce
 April 10, 2018
 Time To Appear/Produce
 AM PM

Name And Address Of Applicant Or Applicant's Attorney
 Arnold Cabe PRO-SE
 13 HAVEN PLACE
 CANTON, NC 28716
 Telephone No. Of Applicant Or Applicant's Attorney
 828-734-0422
 Deputy CSC Assistant CSC Clerk Of Superior Court Superior Court Judge
 Magistrate Attorney/DA District Court Judge
 Date 3-27-2018
 Signature Arnold E. Cabe PRO-SE

RETURN OF SERVICE

I certify this subpoena was received and served on the person subpoenaed as follows:
 By personal delivery. registered or certified mail, receipt requested and attached.
 telephone communication by Sheriff (use only for a witness subpoenaed to appear and testify).
 telephone communication by local law enforcement agency (use only for a witness subpoenaed to appear and testify in a criminal case).
 NOTE TO COURT: If the witness was served by telephone communication from a local law enforcement agency in a criminal case, the court may not issue a show cause order or order for arrest against the witness until the witness has been served personally with the written subpoena.
 I was unable to serve this subpoena. Reason unable to serve: _____

Service Fee \$ Paid Due
 Date Served
 Name Of Authorized Server (Type Or Print)
 Signature Of Authorized Server
 Title

NOTE TO PERSON REQUESTING SUBPOENA: A copy of this subpoena must be delivered, mailed or faxed to the attorney for each party in this case. If a party is not represented by an attorney, the copy must be mailed or delivered to the party. This does not apply in criminal cases.

Subpoena Duces Tecum

To: Dallas Woodhouse, Executive Director North Carolina Republican Party

You are directed no later than the 10th day of April, 2018 to deliver to the issuer of this Subpoena Duces Tecum,

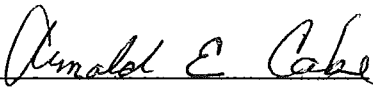
Any and all Audio recorded, video recorded, written and preserved in any retrievable form, whether in Email, typed, preserved or any retained form, any and all discussions, questions, comments and/or vocal, written or videotaped interactions in your possession, or retained on any personal or business computer used by you in the past 18 months concerning/about, relating to contacts with Deborah King, Vice Chair of Haywood County GOP, her immediate family, representative or agent, regarding Any Mention of the Haywood Republican Alliance, Eddie Cabe, Or any Aspect of her present lawsuit pending in Haywood Superior Court, against Haywood Republican Alliance, Eddie Cabe AKA A.E. Cabe Defendant in 12 CVS 116, in said court, Failure to obey this directive within the time allotted shall subject you to any punishment permitted by N.C. statutes. Return of requested documents may be by first class mail. If Desired the originator can prepare the copies for themselves/court.

Questions may be directed to Tel. 828-734-0422

Please send Requested Documents to:

A.E. Cabe
13 Haven Place
Canton, NC 28716

Sent this 27th Day of March 2018



A.E. Cabe PRO-SE

STATE OF NORTH CAROLINA

HAYWOOD County

FILED

File No.

18-CK5-116

In The General Court Of Justice

District Superior Court Division

Deborah King
Vice Chair HAYWOOD GOP

2018 MAR 27 PM Additional File Numbers

VERSUS HAYWOOD COUNTY, C.S.C.

HAYWOOD REPUBLICAN ALLIANCE,
Jeremy Davis, Richard West,
A.E. Cabe

SUBPOENA

G.S. 1A-1, Rule 45; G.S. 8-59

Party Requesting Subpoena

State/Plaintiff Defendant

NOTE TO PARTIES NOT REPRESENTED BY COUNSEL: Subpoenas may be produced at your request, but must be signed and issued by the office of the Clerk of Superior Court, or by a magistrate or judge.

TO Name And Address Of Person Subpoenaed

Aubrey Woodard Chairman
1176 Distric
70 Chestnutway Court
BREVARD, NC 28712

Telephone No.

Telephone No.

YOU ARE COMMANDED TO: (check all that apply):

- appear and testify, in the above entitled action, before the court at the place, date and time indicated below.
- appear and testify, in the above entitled action, at a deposition at the place, date and time indicated below.
- produce and permit inspection and copying of the following items, at the place, date and time indicated below.
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See Attached: Subpoena Duces Tecum

Name And Location Of Court/Place Of Deposition/Place To Produce

Superior Court Haywood County
Waynesville NC

Date To Appear/Produce

April 10, 2018

Time To Appear/Produce

AM PM

Name And Address Of Applicant Or Applicant's Attorney

Arnold Cabe PRO-SE
13 HAVEN PLACE
CANTON, NC 28716

Date

3-27-2018

Signature

Charnold E. Cole PRO-SE

Telephone No. Of Applicant Or Applicant's Attorney

828-734-0422

Deputy CSC

Magistrate

Assistant CSC

Attorney/DA

Clerk Of Superior Court

District Court Judge

Superior Court Judge

RETURN OF SERVICE

I certify this subpoena was received and served on the person subpoenaed as follows:

- By personal delivery. registered or certified mail, receipt requested and attached.
- telephone communication by Sheriff (use only for a witness subpoenaed to appear and testify).
- telephone communication by local law enforcement agency (use only for a witness subpoenaed to appear and testify in a criminal case).

NOTE TO COURT: If the witness was served by telephone communication from a local law enforcement agency in a criminal case, the court may not issue a show cause order or order for arrest against the witness until the witness has been served personally with the written subpoena.

I was unable to serve this subpoena. Reason unable to serve:

Service Fee

Paid

Date Served

Name Of Authorized Server (Type Or Print)

Signature Of Authorized Server

Title

\$ Due

NOTE TO PERSON REQUESTING SUBPOENA: A copy of this subpoena must be delivered, mailed or faxed to the attorney for each party in this case. If a party is not represented by an attorney, the copy must be mailed or delivered to the party. This does not apply in criminal cases.

off

STATE OF NORTH CAROLINA

Haywood County FILED

File No. 18-CVS-116

In The General Court Of Justice
District Superior Court Division

Deborah King
Vice Chair Haywood GOP

2018 MAR 27 PM 4:42 Additional File Numbers

HAYWOOD COUNTY, C.S.C.

VERSUS

HAYWOOD Republican Attorney,
Jeremy Davis, Richard West
A.E. CABE

SUBPOENA

G.S. 1A-1, Rule 45; G.S. 8-59

Party Requesting Subpoena
State/Plaintiff Defendant

NOTE TO PARTIES NOT REPRESENTED BY COUNSEL: Subpoenas may be produced at your request, but must be signed and issued by the office of the Clerk of Superior Court, or by a magistrate or judge.

TO Name And Address Of Person Subpoenaed
Michele Ann Nix
3003 Hillman Rd
KINSTON, NC 28504

Alternate Address
Michele Nix
Vice Chair NCGOP
1506 Hillsborough St.
RALEIGH, NC 27605

YOU ARE COMMANDED TO: (check all that apply):

- appear and testify, in the above entitled action, before the court at the place, date and time indicated below.
appear and testify, in the above entitled action, at a deposition at the place, date and time indicated below.
produce and permit inspection and copying of the following items, at the place, date and time indicated below.
See attached list. (List here if space sufficient)

See Attached: subpoena Duces Tecum

Name And Location Of Court/Place Of Deposition/Place To Produce
Superior Court
Haywood County
Waynesville, NC

Date To Appear/Produce
April 10, 2018
Time To Appear/Produce
AM PM

Name And Address Of Applicant Or Applicant's Attorney
A.E. CABE
13 HAVEN PLACE
CANTON, NC 28716

Date
3-27-2018
Signature
Chanda E. Cabe PRO-SE

Telephone No. Of Applicant Or Applicant's Attorney
828-734-0422
Deputy CSC Assistant CSC Clerk Of Superior Court Superior Court Judge
Magistrate Attorney/DA District Court Judge

RETURN OF SERVICE

I certify this subpoena was received and served on the person subpoenaed as follows:
By personal delivery registered or certified mail, receipt requested and attached.
telephone communication by Sheriff (use only for a witness subpoenaed to appear and testify).
telephone communication by local law enforcement agency (use only for a witness subpoenaed to appear and testify in a criminal case).
NOTE TO COURT: If the witness was served by telephone communication from a local law enforcement agency in a criminal case, the court may not issue a show cause order or order for arrest against the witness until the witness has been served personally with the written subpoena.
I was unable to serve this subpoena. Reason unable to serve:

Service Fee \$ Paid Due Date Served Name Of Authorized Server (Type Or Print) Signature Of Authorized Server Title

NOTE TO PERSON REQUESTING SUBPOENA: A copy of this subpoena must be delivered, mailed or faxed to the attorney for each party in this case. If a party is not represented by an attorney, the copy must be mailed or delivered to the party. This does not apply in criminal cases.

Subpoena Duces Tecum

To: Michele Nix , Vice Chair North Carolina Republican Party

You are directed no later than the 10th day of April, 2018 to deliver to the issuer of this Subpoena Duces Tecum,

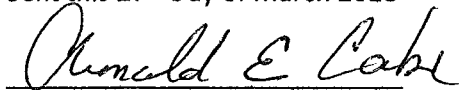
Any and all Audio recorded, video recorded, written and preserved in any retrievable form, whether in Email, typed, preserved or any retained form, any and all discussions, questions, comments and/or vocal, written or videotaped interactions in your possession, or retained on any personal or business computer used by you in the past 18 months concerning/about, relating to contacts with Deborah King, Vice Chair of Haywood County GOP, her immediate family, representative or agent, regarding Any Mention of the Haywood Republican Alliance, Eddie Cabe, Or any Aspect of her present lawsuit pending in Haywood Superior Court, against Haywood Republican Alliance, Eddie Cabe AKA A.E. Cabe Defendant in 12 CVS 116, in said court, Failure to obey this directive within the time allotted shall subject you to any punishment permitted by N.C. statutes. Return of requested documents may be by first class mail. If Desired the originator can prepare the copies for themselves/court.

Questions may be directed to Tel. 828-734-0422

Please send Requested Documents to:

A.E. Cabe
13 Haven Place
Canton, NC 28716

Sent this 27th Day of March 2018

A handwritten signature in cursive script that reads "A.E. Cabe". The signature is written in black ink and is positioned above a horizontal line.

A.E. Cabe PRO-SE

6/1

STATE OF NORTH CAROLINA

File No.

18-CVS-116

Haywood County

FILED

In The General Court Of Justice
 District Superior Court Division

Deborah King
Vice Chair Haywood GOP

Additional File Numbers

2018 MAR 27 PM 1:42

VERSUS

Haywood Republican Association
Jeremy Davis, Richard West,
A.E. Cabe

SUBPOENA

G.S. 1A-1, Rule 45; G.S. 8-59

Party Requesting Subpoena

State/Plaintiff Defendant

NOTE TO PARTIES NOT REPRESENTED BY COUNSEL: Subpoenas may be produced at your request, but must be signed and issued by the office of the Clerk of Superior Court, or by a magistrate or judge.

Name And Address Of Person Subpoenaed

TO Robin HAYES Chair NCGOP
1506 Hillsborough St.
Raleigh, NC 27605

Alternate Address

Telephone No.

Telephone No.

YOU ARE COMMANDED TO: (check all that apply):

- appear and testify, in the above entitled action, before the court at the place, date and time indicated below.
- appear and testify, in the above entitled action, at a deposition at the place, date and time indicated below.
- produce and permit inspection and copying of the following items, at the place, date and time indicated below.
- See attached list. (List here if space sufficient)

See Attached: Subpoena Duces Tecum

Name And Location Of Court/Place Of Deposition/Place To Produce

Superior Court Haywood Co.
Waynesville, NC

Date To Appear/Produce

April 10, 2018

Time To Appear/Produce

AM PM

Name And Address Of Applicant Or Applicant's Attorney

ARNOLD CABE PRO-SE
13 HAVEN PLACE
CANTON, NC 28716

Date

3-27-2018

Signature

Arnold E Cabe PRO-SE

Telephone No. Of Applicant Or Applicant's Attorney

828-734-0422

Deputy CSC
 Magistrate

Assistant CSC
 Attorney/DA

Clerk Of Superior Court
 District Court Judge

Superior Court Judge

RETURN OF SERVICE

I certify this subpoena was received and served on the person subpoenaed as follows:

- By personal delivery.
 - registered or certified mail, receipt requested and attached.
 - telephone communication by Sheriff (use only for a witness subpoenaed to appear and testify).
 - telephone communication by local law enforcement agency (use only for a witness subpoenaed to appear and testify in a criminal case).
- NOTE TO COURT: If the witness was served by telephone communication from a local law enforcement agency in a criminal case, the court may not issue a show cause order or order for arrest against the witness until the witness has been served personally with the written subpoena.
- I was unable to serve this subpoena. Reason unable to serve: _____

Service Fee

Paid
 Due

Date Served

Name Of Authorized Server (Type Or Print)

Signature Of Authorized Server

Title

NOTE TO PERSON REQUESTING SUBPOENA: A copy of this subpoena must be delivered, mailed or faxed to the attorney for each party in this case. If a party is not represented by an attorney, the copy must be mailed or delivered to the party. This does not apply in criminal cases.

Subpoena Duces Tecum

To: Robin Hayes , Chairman North Carolina Republican Party

You are directed no later than the 10th day of April, 2018 to deliver to the issuer of this Subpoena Duces Tecum,

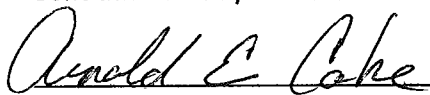
Any and all Audio recorded, video recorded, written and preserved in any retrievable form, whether in Email, typed, preserved or any retained form, any and all discussions, questions, comments and/or vocal, written or videotaped interactions in your possession, or retained on any personal or business computer used by you in the past 18 months concerning/about, relating to contacts with Deborah King, Vice Chair of Haywood County GOP, her immediate family, representative or agent, regarding Any Mention of the Haywood Republican Alliance, Eddie Cabe, Or any Aspect of her present lawsuit pending in Haywood Superior Court, against Haywood Republican Alliance, Eddie Cabe AKA A.E. Cabe Defendant in 12 CVS 116, in said court, Failure to obey this directive within the time allotted shall subject you to any punishment permitted by N.C. statutes. Return of requested documents may be by first class mail. If Desired the originator can prepare the copies for themselves/court.

Questions may be directed to Tel. 828-734-0422

Please send Requested Documents to:

A.E. Cabe
13 Haven Place
Canton, NC 28716

Sent this 27th Day of March 2018

A handwritten signature in cursive script that reads "Arnold E. Cabe". The signature is written in black ink and is positioned above the typed name and title.

A.E. Cabe PRO-SE

IN THE GENERAL COURT OF JUSTICE
STATE OF NORTH CAROLINA

FILED
2018 MAR 20 PM 12:39
HAYWOOD SUPERIOR COURT
HAYWOOD COUNTY, C.S.C. CASE 18CVS 116

DEBORAH
KING

BY RT

VS
HAYWOOD FREPUBLICAN ALLIANCE, JEREMY DAVIS,
RICHARD WEST, A.E.CABE,ET AL

MOTION TO DISMISS

NOW COMES THE DEFENDANT, HAYWOOD REPUBLICAN ALLIANCE AND MOVES THIS HONORABLE COURT TO DISMISS PLAINTIFF'S COMPLAINT for failure to state a cause of action, N.C. Civil Procedure, Rule 12 (b)(6). Defendant adopts each Defense, Averment Cases with cites and DICTA proffered, Delivered, submitted and filed by Attny. Amanda Martin in support of a Motion to Dismiss for Defendants West and Davis. Wherefore, Defendant Prays for this motion to be granted AND such other and further relief as deemed justified. Submitted this 20th day of March 2018 by:

Richard West Treasurer of Defendant Haywood Republican Alliance
Richard West

IN THE GENERAL COURT OF JUSTICE **FILED**
STATE OF NORTH CAROLINA **2018 MAR 20 PM 12:39** HAYWOOD SUPERIOR COURT
HAYWOOD COUNTY, C.S.C. CASE 18CVS 116

DEBORAH KING
VS
HAYWOOD REPUBLICAN ALLIANCE,
JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

BY *RJ*

NOTICE OF MOTION TO DISMISS

On this 20th day of March, 2018, a copy of attached Motions was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786.
And Hand delivered to the Haywood County Clerk of Court

MOTION TO DISMISS

Submitted this 20th day of March 2018 by:

 Richard West Treasurer of Defendant Haywood Republican Alliance
Richard West

C20180437

STATE OF NORTH CAROLINA

File No.

18 cvs 116

HAYWOOD

County

FILED

In The General Court Of Justice
 District Superior Court Division

Name Of Plaintiff
DEBORAH KING

2018 FEB -8 PM 3:56

Address
c/o Russell L. McLean, III

HAYWOOD COUNTY, N.C.

CIVIL SUMMONS

ALIAS AND PLURIES SUMMONS (ASSESS FEE)

City, State, Zip
P.O Box 4, Waynesville, NC 28786

VERSUS

G.S. 1A-1, Rules 3 and 4

Name Of Defendant(s)
HAYWOOD REPUBLICAN ALLIANCE, a Non-Incorporated
Political Action Committee, by and through RICHARD OWEN
WEST, Individually and as Treasurer, et al

Date Original Summons Issued

02/06/2018

Date(s) Subsequent Summons(es) Issued

To Each Of The Defendant(s) Named Below:

Name And Address Of Defendant 1
HAYWOOD REPUBLICAN ALLIANCE
By and through its Treasurer RICHARD OWEN WEST
561 Westwood Circle
Waynesville, NC 28786

Name And Address Of Defendant 2
RICHARD OWEN WEST
Individually
561 Westwood Circle
Waynesville, NC 28786

A Civil Action Has Been Commenced Against You!

You are notified to appear and answer the complaint of the plaintiff as follows:

1. Serve a copy of your written answer to the complaint upon the plaintiff or plaintiff's attorney within thirty (30) days after you have been served. You may serve your answer by delivering a copy to the plaintiff or by mailing it to the plaintiff's last known address, and
2. File the original of the written answer with the Clerk of Superior Court of the county named above.

If you fail to answer the complaint, the plaintiff will apply to the Court for the relief demanded in the complaint.

Name And Address Of Plaintiff's Attorney (if none, Address Of Plaintiff)
Russell L. McLean, III
McLean Law Firm, P.A.
P.O Box 4
Waynesville, NC 28786

Date Issued
2-8-18

Time
3:56 AM PM

Signature
[Handwritten Signature]

Deputy CSC Assistant CSC Clerk Of Superior Court

ENDORSEMENT (ASSESS FEE)

This Summons was originally issued on the date indicated above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is extended sixty (60) days.

Date Of Endorsement

Time AM PM

Signature

Deputy CSC Assistant CSC Clerk Of Superior Court

NOTE TO PARTIES: Many counties have MANDATORY ARBITRATION programs in which most cases where the amount in controversy is \$25,000 or less are heard by an arbitrator before a trial. The parties will be notified if this case is assigned for mandatory arbitration, and, if so, what procedure is to be followed.

RECEIVED

FEB 08 2018

(Over)

BY: _____

NORTH CAROLINA
HAYWOOD COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO. 18-CVS-110

DEBORAH KING,

Plaintiff,

vs.

HAYWOOD REPUBLICAN
ALLIANCE, a Non-Incorporated
Political Action Committee by and
through, RICHARD OWEN WEST,
Individually and as Treasurer of the
HAYWOOD REPUBLICAN
ALLIANCE, JEREMY DAVIS,
Individually and as Member of the
HAYWOOD REPUBLICAN
ALLIANCE, and EDDIE CABE,
Individually and as Member of the
HAYWOOD REPUBLICAN
ALLIANCE, and JOHN DOE 1
THROUGH 6,

Defendants.

MOTION TO DISMISS

FILED
2019 MAR 12 AM 8:50
HAYWOOD COUNTY, C.S.C.
RT

NOW COME Defendants Richard Owen West and Jeremy Davis, by and through undersigned counsel and pursuant to Rules 8 and 12(b)(6) of the North Carolina Rules of Civil Procedure, and move the Court to dismiss the Complaint filed by Plaintiff in its entirety, for failure to state a claim upon which relief can be granted.

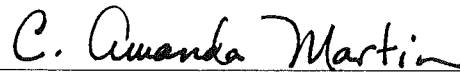
The alleged facts do not state a claim for misappropriation or intentional infliction of emotional distress. Additionally, the complaint fails to state with particularity any specific actions by defendants West and Davis, and pursuant to

G.S. § 59B-7, neither defendant is vicariously liable for any alleged liability of the defendant Haywood Republican Alliance or any of its members.

WHEREFORE, Defendants West and Davis request (a) that the Court dismiss the Complaint filed by Plaintiff in its entirety for failure to state a claim upon which relief can be granted, (b) that the Court find a complete absence of justiciable issues raised by the complaint and (c) all other proper relief.

Respectfully submitted this the 8th day of March, 2018.

STEVENS MARTIN VAUGHN & TADYCH, LLP



C. Amanda Martin
N.C. Bar No. 21186
Attorneys for Defendants
1101 Haynes St., Suite 100
Raleigh, North Carolina 27604
Telephone: (919) 582-2300
Facsimile: (866) 593-7695

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing upon plaintiff by depositing a copy with the United States Postal Service, first-class postage prepaid, addressed to:

Russell L. McLean, III
P.O. Box 4
Waynesville, NC 28786

This the 8th day of March, 2018.



C. Amanda Martin

STATE OF NORTH CAROLINA

File No.

18 cvs 116

HAYWOOD

County

FILED

In The General Court Of Justice
District Superior Court Division

Name Of Plaintiff
DEBORAH KING

FEB -8 PM 3:55

Address
c/o Russell L. McLean, III

HAYWOOD COUNTY, N.C.

CIVIL SUMMONS

ALIAS AND PLURIES SUMMONS (ASSESS FEE)

City, State, Zip
P.O Box 4, Waynesville, NC 28786

VERSUS

G.S. 1A-1, Rules 3 and 4

Name Of Defendant(s)
HAYWOOD REPUBLICAN ALLIANCE, a Non-Incorporated
Political Action Committee, by and through RICHARD OWEN
WEST, Individually and as Treasurer, et al

Date Original Summons Issued 02/06/2018
Date(s) Subsequent Summons(es) Issued

To Each Of The Defendant(s) Named Below:

Name And Address Of Defendant 1
HAYWOOD REPUBLICAN ALLIANCE
By and through its Treasurer RICHARD OWEN WEST
561 Westwood Circle
Waynesville, NC 28786

Name And Address Of Defendant 2
RICHARD OWEN WEST
Individually
561 Westwood Circle
Waynesville, NC 28786

A Civil Action Has Been Commenced Against You!

You are notified to appear and answer the complaint of the plaintiff as follows:

- 1. Serve a copy of your written answer to the complaint upon the plaintiff or plaintiff's attorney within thirty (30) days after you have been served. You may serve your answer by delivering a copy to the plaintiff or by mailing it to the plaintiff's last known address, and
2. File the original of the written answer with the Clerk of Superior Court of the county named above.

If you fail to answer the complaint, the plaintiff will apply to the Court for the relief demanded in the complaint.

Name And Address Of Plaintiff's Attorney (if none, Address Of Plaintiff)

Russell L. McLean, III
McLean Law Firm, P.A.
P.O Box 4
Waynesville, NC 28786

Date Issued 2-8-18 Time 3:55 AM PM

Signature [Handwritten Signature]
Deputy CSC Assistant CSC Clerk Of Superior Court

ENDORSEMENT (ASSESS FEE)

This Summons was originally issued on the date indicated above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is extended sixty (60) days.

Date Of Endorsement Time AM PM

Signature
Deputy CSC Assistant CSC Clerk Of Superior Court

NOTE TO PARTIES: Many counties have MANDATORY ARBITRATION programs in which most cases where the amount in controversy is \$25,000 or less are heard by an arbitrator before a trial. The parties will be notified if this case is assigned for mandatory arbitration, and, if so, what procedure is to be followed.

RECEIVED

FEB 08 2018

(Over)

BY: _____

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE,

JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT

Civil Case 18CVS 116

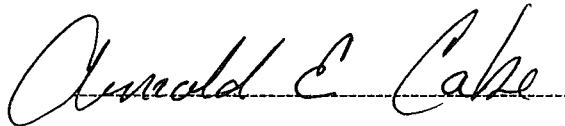
LIBEL

FILED
2018 MAR -8 PM 12:53
HAYWOOD COUNTY, C.S.C.

NOTICE OF MOTION

On this 8 day of March, 2018, a copy of attached Motions was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786.
And Hand delivered to the Haywood County Clerk of Court

AMENDMENT TO ANSWER and
MOTION TO DISMISS II



A.E. CABE, PRO-SE

A.E.CABE
13 Haven Place
Canton, N.C.28716

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD

SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

DEBORAH KING

VS

JEREMY DAVIS, HAYWOOD REPUBLICAN,
RICHARD WEST AND A.E.CABE

AMENDMENT TO ANSWER and
MOTION TO DISMISS II

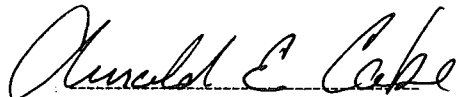
FILED
2018 MAR -8 PM 12:53
HAYWOOD COUNTY, C.S.C.
BY _____

NOW comes the Defendant herein, and moves to replace his original Amendment to Answer/Motion to Dismiss Filed on 7 March 2018 for an inadvertent missing passage; this amendment modifies the Answer of Defendant, dated 2 March 2018 by A motion for Dismissal. Complaint, dated the 2d day of March in the year 2018 by: Adopting each Defense, Averment Cases with cites and DICTA proffered, delivered, submitted and filed BY: Amanda Martin

The Honorable Attorney for Defendants Davis and West on March 8, 2018 in their Motion to Dismiss said Complaint of Plaintiff; Defendant herein restates his amendment to his Answer by Moving this Honorable Court to Dismiss Plaintiff's Complaint for Failure to properly to state a legal cause of action; AND to receive authorities in support of this Motion as Offered and filed by Defendants' Davis and West's Attorney on 8 March 2018 with the Clerk of Court, Haywood County, North Carolina.

WHEREFORE, DEFENDANT PRAYS that this Honorable Court entertain this amended AMENDMENT/MOTION TO DISMISS;

RESPECTFULLY SUBMITTED, THIS 8th day of March, 2018.



A.E.CABE, DEF. PRO-SE

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT

DEBORAH KING

Civil Case 18CVS 116

VS

HAYWOOD REPUBLICAN ALLIANCE,

LIBEL

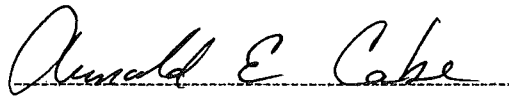
JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

HAYWOOD CO., N.C.
2/7/18
FILED
7 PM 2:16

NOTICE OF MOTIONS

On this ^{7th} day of March, 2018, a copy of attached Motions was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786.
And Hand delivered to the Haywood County Clerk of Court

MOTION IN LIMINE III
AND
AMENDMENT TO ANSWER and
MOTION TO DISMISS



A.E. CABE, PRO-SE

A.E.CABE
13 Haven Place
Canton, N.C.28716

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD

SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

DEBORAH KING

VS

JEREMY DAVIS, HAYWOOD REPUBLICAN ALLIANCE,
RICHARD WEST AND
A.E.CABE

HAYWOOD CO., C.S.C.
2018 MAR -7 PM 2:16
FILED

AMENDMENT TO ANSWER and

MOTION TO DISMISS

NOW comes the Defendant herein, and moves to Amend his original Answer to Plaintiff's Complaint, dated the 2d day of March in the year 2018 by: Adopting each Defense, Averment Cases with cites and DICTA proffered, delivered, submitted and filed BY: C Amanda Martin

The Honorable Attorney for Defendants Davis and West on March 6, 2018 in their Motion to Dismiss said Complaint of Plaintiff; Defendant herein restates his amendment to his Answer by Moving this Honorable Court to Dismiss Plaintiff's Complaint for reasons stated explicitly, directly, with an abundance of legal authorities, on point, disputing in Its entirety said complaint .

WHEREFORE, DEFENDANT PRAYS that this Honorable Court entertain this AMENDMENT/MOTION TO DISMISS;

Giving consideration to all legal theories and case law contained within and; with the wisdom of this Court And its dedication to Justice; Dismissing said Complaint while Accepting this amendment and Motion to Dismiss.

RESPECTFULLY SUBMITTED, THIS 7th day of March, 2018.



A.E.CABE, DEF. PRO-SE

STATE OF NORTH CAROLINA
COUNTY OF HAYWOOD

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT
CIVIL CASE 18CVS 116

MOTION IN LIMINE III

DEBORAH KING
VS
HAYWOOD REPUBLICAN ALLIANCE
JEREMY DAVIS, RICHARD WEST
A.E. CABE

FILED
MAR 07 PM 2:16
HAYWOOD CO., C.S.O.
BY

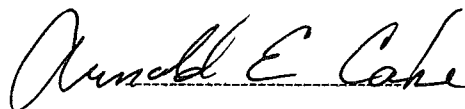
WHEREFORE, THE issues of Plaintiff's Exhibits are in violation of the statutes and case law By, primarily, the placing of irrelevant, prejudicial items in the case file, not even renewing the objection of unauthenticated material in the file knowing that most of the exhibits are inadmissible in their present formats and posture.

THEREFORE exhibits C-1 is challenged due to statements contained by a 3rd party, not in this case; C-4 where Plaintiff put the exhibit with a bowl of money, implying that this in some way was connected to this Defendant; this should be removed and Plaintiff and Counsel rebuked. Exhibits D's and E's- again full of conversations by 3rd parties, irrelevant, not germane and prejudicial. E-4 full of hearsay by parties with no connection to the case; F. the entire exhibit is conversations and observations, all irrelevant, hearsay and prejudicial. Exhibit G, again replete with observations and comments of others. If these travesties are not remedied to the satisfaction of the Defendant, then consideration might be given to requesting the extra time from this Honorable Court to file a Counterclaim.

WHEREFORE, DEFENDANT PRAYS THAT;

1. This Honorable Court inquire into this Motion and requires remedial action of the Plaintiff to correct the Exhibits; AND
2. Defendants have such other relief as deemed appropriate.

Respectfully submitted this 7th day of March, 2018



A.E.CABE, PRO SE

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

2018 MAR -6 AM 11:32

COUNTY OF HAYWOOD

HAYWOOD COUNTY, C.S.C.

HAYWOOD SUPERIOR COURT

BY PT

CIVIL CASE 18CVS 116

MOTION OF WITHDRAWAL

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RIC HARD WEST,

A.E. CABE, ET AL

COMES NOW THE DEFENDANT A.E. CABE AND MOVES TO WITHDRAW A MOTION FILED ON 2 MARCH 2018 titled "MOTION TO CLARIFY", as it was incomplete.

The complete Motion of Replacement Titled "MOTION TO DESIGNATE PLAINTIFF AS A LIMITED PURPOSE PUBLIC FIGURE" is filed this 6 day of March 2018.

Respectfully submitted this 6 day of March 2018.

RESPECTFULLY,

Arnold E. Cabe

A.E. CABE, PRO-SE

STATE OF NORTH CAROLINA

FILED

2018 MAR -6 AM 11:32

COUNTY OF HAYWOOD

HAYWOOD COUNTY, N.C. IN THE DISTRICT COURT

DEBORAH KING

BY RT Civil Case 18CVS 116

VS

HAYWOOD REPUBLICAN ALLIANCE,

LIBEL

JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

NOTICE OF MOTION

On this 6 day of March, 2018, a copy of attached Motion was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786. And the delivered to the Haywood County Clerk of Court

MOTION TO DESIGNATE PLAINTIFF
AS A LIMITED PURPOSE PUBLIC FIGURE

Donald E Cabe

A.E. CABE, PRO-SE

A.E.CABE
13 Haven Place
Canton, N.C.28716

STATE OF NORTH CAROLINA **FILED**

IN THE GENERAL COURT OF JUSTICE

2018 MAR -6 AM 11:32

COUNTY OF HAYWOOD HAYWOOD COUNTY, C.S.C.

HAYWOOD SUPERIOR COURT

BY PT

CIVIL CASE 18 CVS 116

MOTION TO DESIGNATE PLAINTIFF

AS A LIMITED PURPOSE PUBLIC FIGURE

NOW COMES THE DEFENDANT HEREIN and shows this Honorable Court the following : In order to facilitate an orderly progression of the pending trial AND; permit said Defendant to organize his defense; IT is necessary that the Plaintiff be designated and appointed as a Limited Purpose Public Figure or, in the alternative, some other Public Figure(GOETZ V

WELC H, 418 US 323, 1974). This decision will provide the Defendant with the certainty required to pinpoint and resist the Plain tiff's shotgun attacks.

Attached as exhibit A is the reasoning and facts to support this Motion; a enumeration of Plaintiff's Political activities in Haywood these past 8-10 years.

WHEREFORE, DEFENDANT PRAYSTHAT:

This Motion be inquired into and, the Plaintiff be designated as requested with legal limitations placed on her continuation of her Complaint; and That Defendant be given such other relief as deemed appropriate.

THIS ⁶-----Day of March, 2018.

Respectfully Submitted.
A.E. CABE, PRO SE

Arnold E Cabe

Exhibit A

Debbie King "Limited Public Use Figure" Profile

2017-2018 Vice chair of the Haywood County GOP (Current HCGOP Vice Chairwoman)

2015-2016 Spear headed and lead the fight against Haywood County Emergency Management Ordinance
(Addressed County Board of Commissioner meeting and Public hearings on Video)

2015 Spear headed and lead the fight against Haywood County's Beaverdam Recycling center (held
rally's and meetings) (Addressed County Board of Commissioner meeting and Public hearings many
on Video)

2014 Campaign Manager and Campaign Finance Officer for Husband Denny King's run for Haywood
County Commissioner

2013 Law Suit against Haywood County Property Tax Commission (Addressed County Board of
Commissioner meeting and Public hearings on Video, and the Court)

2012 Campaign Manager and Campaign Finance Officer for Husband Denny King's run for Haywood
County Commissioner

2010 Campaign Manager and Campaign Finance Officer for Husband Denny King's run for Haywood
County Commissioner

2009 spear headed and lead the fight against Haywood county Board of Health Solid Waste Rule.
(Addressed County Board of Commissioner meeting and Public hearings at Haywood County Health
Department, Also on Video)

2008 Local Campaign organizer for Ron Paul for US President.

Other past and present Political elected Positions

Haywood GOP Vice Chair

Haywood County GOP Precinct Chair

Member at Large for 11th District NCGOP

County GOP Delegate

District 11 GOP delegate

State NCGOP Delegate

Other Activities

Fund raising for Haywood GOP and County, State, and National Republican and Libertarian Candidates.

And many other Public Figure activities.

Arnold E. Cole PRO-SE

March 6, 2018

IN THE SUPERIOR COURT OF HAYWOOD COUNTY

FILED

2018 MAR -2 PM 1:08

STATE OF NORTH CAROLINA
HAYWOOD COUNTY, C.S.C.

BY _____

PK

CASE File No. 18 CVS 116

DEBORAH KING VS. HAYWOOD REPUBLICAN ALLIANCE;

JEREMY DAVIS, RICHARD WEST, EDDIE CABE, ET AL

NOW COMES Defendant Cabe herein, filing his Answer, Objections, Counterclaim and illegality of Plaintiff's assertions and innuendoes:

GENERAL

Paras 1, 2, 3 Defendant cannot admit or deny any of these as assertions, demanding proof of same;

Para 4 is admitted.

Para 5 cannot be admitted or denied for lack of proof.

Para 6 Unknown

COUNT I

Invasion of Privacy

Paras:

7. Deny in totality;

8, 9 Admit

10. Cannot admit or deny without more proof;

11. Deny, demand strict and adequate proof;

12. Unable to agree as there are too many offenders alleged without any partitioning of specific acts;
cannot respond as to unknown defendants or members of HRA;

13. Unable to respond without specific proof directed to any possible acts of this defendant;

14. Deny;

15. Cannot admit/deny for lack of knowledge;

16. Unknown; demand proof before designating Defendant on these allegations;

17. Deny as alleged, political discourse engaged in by Plaintiff, are not illegal in N.C.;

18. Deny that ANY harm was intended or received; the Plaintiff has, herself, participated in political Acts towards others;

19. Deny receiving any profit from the sale of any items as alleged,

20. Unknown

PUNITIVE DAMAGES

21. Deny the unwarranted words of Plaintiff, i.e. intent to harm her, spiteful, reputation of Plaintiff, ridicule of her; demand strict proof of her reputation as well as alleged medical treatment for all of these unproven allegations of misconduct;

22. Deny the totality of this paragraph; no facts or veracity contained herein;

23. Unable to respond without the famous Emails referred to in this Para.

24. Not enough info to respond to;

25. Cannot comment of Plaintiff's mental problems with sufficient data as to medications, Psychiatrists and/or Psychologists;.

26. Unknown

INJUNCTIVE RELIEF


27. Deny this claim; Plaintiff is a Public Figure within libel/slander laws (NY Times V Sullivan, US Sup. CT), therefore, there can be no recovery or other actions without the proof by Plaintiff of intent, not just to embarrass, but to damage permanently her reputation by this Defendant.

28. Deny that Plaintiff s without remedies; Witness this lawsuit, is this not sufficient for Plaintiffs? She does not lack access to courts or resources to retain the attorney of her choice. I deny and challenge every false statement contained in this para.

29. Same answer as para28; NC laws do not permit such a proposed action without some request from Plaintiff to the Defendant to cease and desist. There has been no request AND no alleged acts in months and months.

30. Deny in its entirety.

Continuing Defendant challenges and denies any facts or evidence that would permit any damages, attorney fees or injunction, reserved for the most drastic types of actions; The political nature of this case disturbs most in this and other counties because of its instance on the most severe malignment and chastisement of anyone selected by lot by a Plaintiff to walk the plank. Additionally, this is just the reason that many avoid politics; not for the words BUT because of the courts.

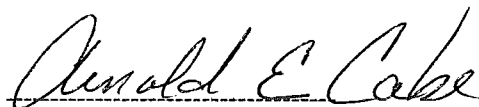
A handwritten signature in cursive script that reads "Arnold E. Cabe". The signature is written in black ink and is positioned above the typed name.

AE CABE, PRO-SE

PRAYER
CASE File No. 18 CVS 116

WHEREFORE, Defendant Prays that this Honorable Court administer justice with the following:

1. Dismiss all pleadings of Plaintiff as there is no precedent in North Carolina for the confused presentations of Plaintiff; no veracity in her claim of thousands of dollars for what? A bit of political embarrassment in which she was a major player;
2. Denial of any claim for punitive damages as the incidents even if vaguely valid are not permissible reasons in this state for the imposition of such a harsh remedy, resembling revenge and irrational in her attempts to profit rather than assert correct legal principles;
3. Strike and dismiss the count of the complaint seeking an injunction as there are NO facts or even vague allegations with legal standing to justify any authorization to issue such a fiat; their drastic remedy is reserved for situations requiring immediate action or where incidents have been repeated or continued for a period of time. In view of the facts and no request by Plaintiff for the conduct to abate, this request has no legs;
4. The allegations of the Plaintiff fail in most instances to identify and specify the individual who is alleged to have committed the acts, using instead the Haywood Republican Alliance or referring to a group. This, without elaboration, is improper, deficient and reckless. Pray that the Plaintiff be directed to revise her complaint to be specific about each claimed incident as to party, time and place. There is no way to defend oneself against generalized, shotgun like and careless allegations.
5. That Defendant receive attorney's fees from Plaintiff for abuse of process, irrational claims as well as ignoring the laws of the State of North Carolina in her eagerness to collect a few dollars.



EDDIE CABE, PRO-SE

STATE OF NORTH CAROLINA

FILED

COUNTY OF HAYWOOD

2818 MAR -2 PM 1:09

IN THE DISTRICT COURT

DEBORAH KING

HAYWOOD COUNTY, C.S.C.

Civil Case 18CVS 116

VS

BY RT

HAYWOOD REPUBLICAN ALLIANCE,

LIBEL

JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

NOTICE OF MOTIONS

On this 2nd day of March, 2018, a copy of attached Motions was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786. And the delivered to the Haywood County Clerk of Court

MOTION FOR SPECIFICITY
MOTION IN LIMINE #1
MOTION IN LIMINE #2
MOTION TO CLARIFY
MOTION ON EXHIBITS

Arnold E. Cabe

A.E. CABE, PRO-SE

A.E.CABE
13 Haven Place
Canton, N.C.28716

STATE OF NORTH CAROLINA

FILED

GENERAL COURT OF JUSTICE

2018 MAR -2 PM 1:09

COUNTY OF HAYWOOD

HAYWOOD COUNTY, C.S.C.

SUPERIOR COURT OF HAYWOOD

BY _____

CIVIL CASE 18CVS116

DEBORAH KING

VS

JEREMY DAVIS, RICHARD WEST, A.E.CABE,

HAYWOOD REPUBLICAN ALLIANCE, ET AL

MOTION for SPECIFICITY

Throughout the Complaint of Plaintiff, she uses the term group and organization as well as frequent referrals to the undersigned personally, et al, interchangeably. There is no way to separate the multitude of allegations and charges by Defendant nor is there any certainty or specificity as to whom the plaintiff is alleging did what to whom and when these acts occurred. With this mass confusion caused by a 'scattergun' the actions of the Plaintiff are unreasonable, unfair and unjustified. If she is lacking in knowledge of the party who supposedly did the things alleged by her, she should use methods of inquiry BEFORE rushing to the courthouse to accuse any and all for her woes. Defendant seeks this relief prior to the initiation of formal court in order to limit the possible issues, thereby preserving this Honorable Court's time and resources.

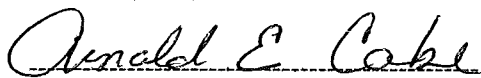
WHEREFORE,

1. Defendant Prays that this Motion be inquired into and corrective action be required of the Plaintiff;
AND

2. Plaintiff be admonished for "group" allegations, thereby tarnishing Defendant as she alleges was done to her;

3. Defendant receive such other justice and consideration as deemed proper.

Respectfully submitted this 2nd day of March 2018.



A.E. Cabe, PRO-SE

STATE OF NORTH CAROLINA
JUSTICE

FILED
2018 MAR -2 PM 1:09
HAYWOOD COUNTY, C.S.C.

IN THE GENERAL COURT OF
SUPERIOR COURT

COUNTY OF Haywood

CIVIL CASE 18 CVS 116

BY _____

DEBORAH KING
VS

HAYWOOD REPUBLICAN ALLIANCE,

RICHARD WEST, JEREMY DAVIS, A.E. CABE

ET. AL.

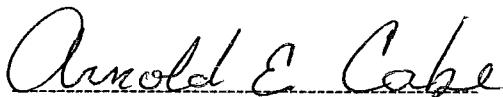
MOTION IN LIMINE #1

NOW COMES DEFENDANT CABE HEREIN and moves this Honorable Court to prohibit Plaintiff From speaking about, displaying, or referring in any manner to Exhibits attached to Plaintiff's Complaint, specifically as B,C2,C3,C4,D1,D3, E1, E2, F, G. These exhibits have no authentication, Contain Hearsay, and alleged messages from third parties, not parties to this action, nor with any consent of these third parties. Plaintiff should be cautioned by this Honorable Court should any delay ensue before a hearing on this Motion, to insure that the named exhibits are not released or referred to by her.

There is no showing that said exhibits were received in a lawful manner or achieve the status of evidence in any manner whatsoever.

WHEREFORE, Defendant Prays that this Honorable Court issue a protective order directed to Plaintiff Insuring that potentially illegal matters taint this trial; AND Render a decision invalidating and prohibiting any of said exhibits being produced in said Court.

Respectfully Submitted,



A.E. CABE, PRO-SE

This 2nd day of March, 2018.

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

2018 MAR -2 PM 1:09

COUNTY OF HAYWOOD

HAYWOOD COUNTY, C.S.C.

HAYWOOD SUPERIOR COURT

BY _____

DEBORAH KING

CASE File No. 18 CVS 116

VS

JEREMY DAVIS, RICHARD WEST, A.E.

CABE, HAYWOOD REPUBLICAN ALLIANCE,

ET. AL

MOTION IN LIMINE #2

NOW comes the Defendant A.E. Cabe and in furtherance of his motion shows this Honorable Court the following: certain of the exhibits alleged in the first Motion In Limine are incomplete, indicating that someone, intentionally or accidentally terminated or cut off parts of exhibits showing pictures or words, which are likely to give different meanings to characterizations, conversations or interplay of the parties.

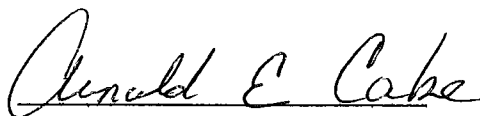
As the evidence proving this is technical, it might be necessary to retain an expert to Verify the allegations contained herein.

WHEREFORE DEFENDANT PRAYS THAT;

A, Plaintiff be precluded from changing, replacing any exhibits from B, C1, C2, C3, C4, D1, D2, D3,D4, E1,E2, F and G, until this matter is heard; AND

B. Defendant have a hearing on this matter prior to the initiation of trial.

Respectfully Submitted this 2nd day of March 2018.



A.E.Cabe

IN THE SUPERIOR COURT OF **FILED**

2018 MAR -2 PM 1:09

STATE OF NORTH CAROLINA HAYWOOD COUNTY, C.S.C.

IN THE GENERAL COURT OF JUSTICE

BY _____

DEBORAH KING

HAYWOOD SUPERIOR COURT

Vs

HAYWOD REPUBLICAN ALLIANCE,
JEREMY DAVIS, RICHARD WEST,
A.E. CABE
ET. AL.

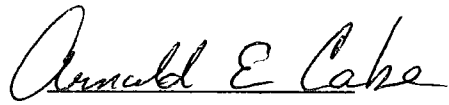
CIVIL CASE 18 CVS 116

LIBEL

MOTION TO CLARIFY

This Motion is made in efforts to clarify the status of the Plaintiff, i.e. private party or limited purpose public party. This determination to be made by the Court could save a great deal of time for all persons involved in this trial. The selections of manners of proof depend greatly on the Court's ruling on this Motion. The cases of Gaunt V Pittway, 139 NC Ct Appeals 778(2000) and Gertz V Welch, 418 US 323 are on "all fours" with the facts in the present case.

Respectfully Submitted THIS 2nd DAY OF MARCH 2018



E. CABE, PRO SE

STATE OF NORTH CAROLINA

FILED

2018 MAR -2 PM 1:09

COUNTY OF HAYWOOD

HAYWOOD COUNTY, C.S.C. IN THE GENERAL JUSTICE COURT

BY _____

MOTION ON EXHIBITS

HAYWOOD SUPERIOR COURT

DEBORAH KING

Vs

JEREMY DAVIS, RICHARD WEST,
A.E. CABE, HRA, ET AL

NOW COMES Defendant Cabe and Motions this Honorable Court as follows: While renewing objections in Motion 1 on Exhibits stated, Defendant makes the following objections to Exh. D4 as being incomplete, as shown by expiration shown on clock attached; Paused at 00:28 seconds, it appears as if this is only a partial exhibit; object to exh E-2 as being primarily the voices of persons not associated with this case, being hearsay and irrelevant. Objections to Exhibits F and G as not being relevant or pertinent and composed of language by third persons. The objection to all of hearsay, failure to authenticate and lack of original documents is renewed.

WHEREFORE, Defendant Prays that this Honorable Court grant this Motion, requiring Plaintiff to meet the standards outlined herein and in MOTION IN LIMINE 1 and 2 AND
2. Approve such other measures as deemed appropriate.

Submitted this 2d day of March, 2018,



A.E. Cabe, Pro Se

CASE 18 CVS 116

In Re: Service of Answer, Interrogatories, Prayer, and Request for Production of Documents

FILED

2018 MAR -2 PM 1:08

TO; MR. McLean, Attorney for Plaintiff WYOMING COUNTY, C.S.C.

BY AT

UP the provisions of Article 33, N.C. Rules of Civil Procedure, you are served the Answer and stated Documents, interrogatories, and request for Documents, to be completed and returned within 30 days from date of receipt.

INTERROGATORIES

Respectfully Submitted
A.E. Cabe, PRO-SE

 Arnold E Cabe

This 2^d day of March, 2018

A.E. Cabe
13 Haven Place
Canton, NC

IN THE CIRCUIT COURT OF HAYWOOD COUNTY

STATE OF NORTH CAROLINA

FILED
2016 MAR -2 PM 1:09

HAYWOOD COUNTY, C.S.C.

DEBORAH KING

BY _____

18 CVS 116

COMPLAINT FOR DAMAGES/INJUNCTION

V

HAYWOOD REPUBLICAN ALLIANCE, JEREMY

DAVIS, RICHARD WEST, EDDIE CABE, ET AL

MOTION TO ANSWER INTERROGATORIES

NOW COMES Defendant Cabe and submits the following interrogatories' for Plaintiff's

Completion IAW Civil Procedure, State of North Carolina:

1. State if you have been married before; the children that you have and the term of your Residence in Haywood County;
2. State if you have ever been a party to a lawsuit, your position and the court with case stated, as well as subject matter;
3. State the period that you have been involved in politics, local and statewide, and candidates whom you have supported, including family members. State in detail the conversations that you had on election night in 2016 at the HRA regarding your daughter being threatened by anonymous persons.
4. State if you ever advised, cajoled or pleaded with Eddie Cabe to cease his activities, if any, to pursue photographs, images, buttons, emails, etc. to embarrass you and your family. If not, why not. How long a period did you know about the alleged items in circulation? Why did you not act sooner to halt any embarrassment?

5. State any Psychiatrist, psychologist or medical person that you consulted, had an interview with or any contact with since 1 April 2017; also describe/list any drugs ingested by you, the total amount and number of prescriptions used or possessed since the date outlined.

6. State any hospitalization, trips to the ER or any contacts with medical personnel since 1 April 2017 not outlined herein. Did you receive any prescriptions from your Son-in-Law? If so what drug, amount and disorder treated?

7. Did you see any of THE buttons being sold or purloined or did anyone report it to you? If so, who told you and who was present at this conversation? If you knew, did you take action to stop the sales? If not, why not? How did you find out first about the buttons? And when did you find out?

8. Did anyone at the HCGOP urge or advise you to initiate this action? Did you talk to anyone at HCGOP at any time about your embarrassment or the way you felt about the alleged incidents?

9. Did you serve or undergo any confinement at home or a medical facility since 1 April 2017 for any of the conditions outlined in your complaint? Be specific, giving names of parties who can verify your illnesses.

10. When did you first see any picture of you, alone or with another, in a humorous pose? Did you consider at that point looking into the sponsors of the photos?

11. Have you never seen a politician's face on something hilarious? Did you know that most politicians are 'public figures' with impediments to their suing for defamation/libel etc.?

12. Have you ever said, since 1 April 2017; to a 3rd party anything derogatory about Jeremy Davis, Richard West or Eddie Cabe? If so, where and when and before whom did this occur?

13. Now you swore to each word, each sentence and each paragraph in your complaint; this is a massive pursuit. Do you want to revise or curtail your inflammatory language in favor of the facts of the issues?

14. From 1 April 2017 to the present, your parameters for the time element, have you reacted to your alleged stress by acting irrationally or doing acts not normal or sane? Indicate where, when and the witnesses.

15. You said in your appeal for an injunction that you were without remedies; what do you call this present suit with 9 Defendants? Is your statement referred to accurate?

16. You say in the midst of an expensive lawsuit that you never asked any Defendant, including Mr. Cabe To cease any activities embarrassing to you; isn't that your testimony? In effect you did nothing to keep these matters from festering, did you?

17. How many years have you been involved with politics, including your husband's races? Has no one during this period spoken in your presence profanity or other demeaning words?

18. Who are your closest associates (5 is enough)? Where do they live?

19. What bothers you the most, the picture of you and the man OR the joined name Kebbie? How did you first find out about the items floating around?

20. Have you in the last 5 years associated with anyone with a criminal background? If so, who was it? And where was the location?

21. Did you not consider that your failure of efforts to defuse these incidents led directly to the Courthouse?
Did you not know these 3 before the incidents? Weren't all of you associated politically? If not, explain.

22. You implied that you shied from publicity BUT your actions lead directly to more; explain. Were you involved in efforts to diminish the HRA or put it out of business?

23. If you are a peacemaker as inferred, why did you not attempt to resolve some of the issues between the two groups? If so, what specifically did you do in this regard?

24. You've held office in the HCGOP for many years now; would you say that there is stress in that position? If you suffer from stress, why did you not just resign the political position?

25. Do you not hold against the Defendants the same thoughts, i.e. that you allege against them.....evil, hateful, desire to hurt/embarrass? If not, why do you seek thousands of dollars from them?

26. Were you upset because a few might interpret the picture as showing you and the Chairman (HCGOP) as more than friends?

27. Did Mr. Cabe's wife Selena, not ask you repeatedly, not to call her husband and get him involved in your political problems? Did Selena not tell you that it was because Mr. Cabe had been through a year of chemotherapy and a bone marrow transplant, due to stage 4 Mantle Cell Lymphoma; that his health wasn't good and he did not need the stress and aggravation?

28. Has Michele Nix, Vice Chair of the North Carolina GOP, or Anyone else at the NCGOP contributed any money, legal advice, or encouragement for this Civil Action?

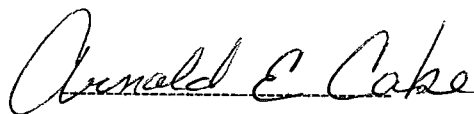
Arnold E Cabe *PRO-SE*

3/2/2018

PRAYER
CASE File No. 18 CVS 116

WHEREFORE, Defendant Prays that this Honorable Court administer justice with the following:

1. Dismiss all pleadings of Plaintiff as there is no precedent in North Carolina for the confused presentations of Plaintiff; no veracity in her claim of thousands of dollars for what? A bit of political embarrassment in which she was a major player;
2. Denial of any claim for punitive damages as the incidents even if vaguely valid are not permissible reasons in this state for the imposition of such a harsh remedy, resembling revenge and irrational in her attempts to profit rather than assert correct legal principles;
3. Strike and dismiss the count of the complaint seeking an injunction as there are NO facts or even vague allegations with legal standing to justify any authorization to issue such a fiat; their drastic remedy is reserved for situations requiring immediate action or where incidents have been repeated or continued for a period of time. In view of the facts and no request by Plaintiff for the conduct to abate, this request has no legs;
4. The allegations of the Plaintiff fail in most instances to identify and specify the individual who is alleged to have committed the acts, using instead the Haywood Republican Alliance or referring to a group. This, without elaboration, is improper, deficient and reckless. Pray that the Plaintiff be directed to revise her complaint to be specific about each claimed incident as to party, time and place. There is no way to defend oneself against generalized, shotgun like and careless allegations.
5. That Defendant receive attorney's fees from Plaintiff for abuse of process, irrational claims as well as ignoring the laws of the State of North Carolina in her eagerness to collect a few dollars.



A.E. CABE, PRO-SE

REQUEST FOR PRODUCTION OF DOCUMENTS

Copies of requested documents are sufficient; if documents have a different name or number than is commonly used, the closest document will satisfy. This request will be completed within the time allotted by N.C. laws:

Plaintiff will furnish requested documents, signing under oath as to her belief that these are compatible with the request OR such documents are not available:

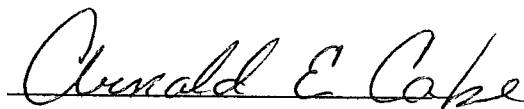
Produce any/all copies of prescriptions prescribed within 36 months from the date of your receipt

Of this request;

1. Identify each medical doctor that you have seen in said 36 month period, along with his/her address and phone number;
2. Produce copies of all Physicians' notes for each visit OR a complete narrative summary including facts each visit;
3. Copies of any notebooks, memo books, calendars or any written matter incorporating any Doctor's visit, or prescription;
4. Copies of all Emails that you sent or received at any time from 1/1/2017 till the date of your receipt of this request IN WHICH you or your correspondent mention, allude to or conceal any identity of this Defendant or the Haywood Republican Alliance.
5. Copy of any law enforcement report of your allegation made on election night 2016 that "someone had threatened your daughter's life".
6. Any correspondence from the NCGOP, any officer of same, or the 11th District GOP, REGARDING the HRA and/or the Defendant originating this request.

Respectfully Submitted

A.E. Cabe, PRO-SE



This 2nd day of March, 2018

HAYWOOD COUNTY CLERK OF COURT

L134596 04/09/18 11:22:52

PAYOR: MILLER, MONROE

PAYEE: COPIES

CASE#: VCAF:N

CITA#:

21410 COPY FEES 20.00

TOTAL PAID 20.00

CA TENDERED 100.00

CHANGE 80.00

5723 ID C43BCB