

K.G. Watson
112 Raven Ridge
Maggie Valley, N.C.
28751

North Carolina Bar Association
NC State Bar, 217 E Edenton St.
Raleigh, N.C.,27601

Sirs: Re; Complaint Against Thomas Stark;
Violation Of Professional Ethics

I, the undersigned Hereby complain Against
Thomas H. Stark, ID 10052, 6011 Farrington Rd. , Suite 300, Chapel Hill, NC 27611
License date 8/22/1981 status Active, phone 919-490-5550.
Enclosed as Exhibits A1 - F is documentary proof of an intentional effort of the Four(4)persons stated
to ignore the efforts of A.E. Cabe, who issued subpoenas duces tecum to the 4 named plus Thomas
Stark, who it is clear has orchestrated the joint efforts to cover for him in his false assertions that all 4
are clients. The scheme is to prevent their answering the subpoenas D,T
(Exhibits A1-A5: the 5 Original Subpoenas Duces Tecum with attached letters), (Exhibits B1-B5 : Mr.
Starks 5 responses' and objections to Subpoenas Duces Tecum) , (Exhibits C1-C5: our 2nd letter of
request to the 5 dated April 13 2018 Time and Date for production) , (D1: letter to Michele Nix), (D2:
Letter to Dallas Woodhouse), (Exhibit E: our last letter to Thomas Stark), (Exhibit F :Mr. Starks Response
in Opposition to A.E.Cabes April 113 2018 filing))

In a civil suit currently in Haywood County District Court, 18 CVS 116, D. KING Vs HAYWOOD
REPUBLICAN ALLIANCE,WEST, DAVIS, A.E. CABE,PRO SE, PLUS 6 ALIAS PLURES.
THIS is a political case brought by a member of the Haywood County GOP against the defendants,
members of the Haywood Republican Alliance over a pin-on button, showing two unidentified persons,
one female and one male. The assumption of Mr. Cabe is that the 4 plus Stark had numerous
communications with the Plaintiff in her support over the past 12 months; possibly within the Emails of
the Parties might be incriminating or necessary matters admissible in the pending trial of the case
alleged.

In the past, the group of Five has been supportive of the group of the Plaintiff and a few of the HRA have been barred, by questionable methods, of Mr. Stark and the Four, from holding any office of the NCGOP for 4-5 years. None has challenged Mr. Stark about his methods and, perhaps, improper procedures.

This complaint is not about rumors or hearsay; it is about 'whether an attorney may allege that non-clients are his real clients AND; hampering sincere efforts to delve into the relationship of Stark and the Four. It is true that he is the counsel for the NCGOP, but, to date there is no connection between the Subpoenas D.T. and their responsibilities to the members of the NCGOP. Mr. Cabe seeks any documentary evidence that might show Involvement of any in the initiation of this suit. Why should a GOP official fear to show their Emails if they are not relevant. In my opinion, Mr. Stark has inserted himself improperly, possibly illegally, in a civil matter that should not affect his group, unless they are in it already.

I know about politics BUT I also know about right and wrong. When an attorney involves himself in something, improperly, using his license as a shield AND endangering others by Contempt of Court; it is past time for the knowing to take action. Mr. Cabe is Pro-Se, as he doesn't have funds to hire an attorney. I am filing Pro Hac Tunc as soon as a Judge is assigned. I assisted Mr. Cabe with some advice as he defended himself.

I thank you for your time in considering this serious matter.

Sincerely, K.G. Watson

K.G. WATSON

Member Ga. Bar (1963) 7410700
Phone 828 333 1423

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

STATE BAR
OF GEORGIA

K. Glynn Watson

Membership Number

741700

Year Admitted

1963

GM

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
 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
Chapel Hill, NC 27517
 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
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.

A 1

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,

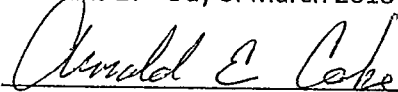
Any and all Audio recorded, video recorded, written and preserved in any retrievable form, whether in Email, typed, preserved or any retained form, any and all discussions, questions, comments and/or vocal, written or videotaped interactions in your possession, or retained on any personal or business 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

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

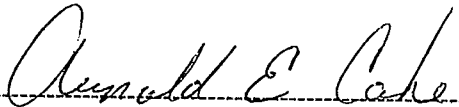
NOTICE OF SUBPOENA DUCES TECUM

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

CPH

STATE OF NORTH CAROLINA

File No.

18-CV5-116

Haywood County

In The General Court Of Justice

District Superior Court Division

Deborah King
Vice Chair Haywood GOP

Additional File Numbers

FILED
MAR 27 PM 1:42

VERSUS

Haywood Republican Attorneys
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

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

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.

(Please See Reverse Side)

AOC-G-100, Rev. 5/13

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A 2

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

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

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
Michele Ann Nix
3003 Hillman Rd
KINSTON, NC 28504

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

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 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

PRO-SE

Date

3-27-2018

Signature

Chad E. Cabe PRO-SE

Telephone No. Of Applicant Or Applicant's Attorney

828-434-0422

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.

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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.

(Please See Reverse Side)

AOC-G-100, Rev. 5/13

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A3

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.

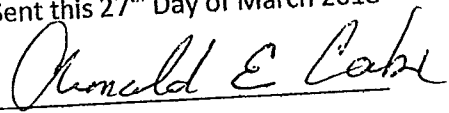
If Desired the originator can prepare the copies for themselves/court.

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.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

2018 MAR 27 PM Additional File Numbers

Vice Chair Haywood GOP

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

Alternate Address

Telephone No.

1-919-671-1050

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

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

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

Paid

Date Served

Name Of Authorized Server (Type Or Print)

Signature Of Authorized Server

Title

\$ Due

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A 4

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,

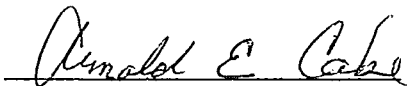
Any and all Audio recorded, video recorded, written and preserved in any retrievable form, whether in Email, typed, preserved or any retained form, any and all discussions, questions, comments and/or vocal, written or videotaped interactions in your possession, or retained on any personal or business 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 Republican Alliance,
Jeremy Davis, Richard West
A.E. Cohe

HAYWOOD COUNTY, C.S.C.

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
170 Chestnutway Court
BREVARD, NC 28712

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 Cohe PRO-SE
13 HAVEN PLACE
CANTON, NC 28716

Date
3-27-2018
Signature
Arnold E Cohe 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).
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- I was unable to serve this subpoena. Reason unable to serve: _____

Service Fee	<input type="checkbox"/> Paid <input type="checkbox"/> Due	Date Served	Name Of Authorized Server (Type Or Print)	Signature Of Authorized Server	Title
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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.

A5

Subpoena Duces Tecum

To: Aubery Woodard , Chairman 11th District North Carolina GOP

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

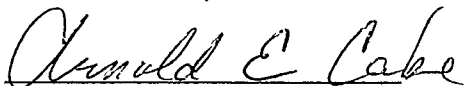
Any and all Audio recorded, video recorded, written and preserved in any retrievable form, whether in Email, typed, preserved or any retained form, any and all discussions, questions, comments and/or vocal, written or videotaped interactions in your possession, or retained on any personal or business 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
COUNTY OF HAYWOOD

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

DEBORAH KING, Vice Chair of
Haywood GOP,

Plaintiff,

v.

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

Defendants.

**WRITTEN OBJECTION TO
SUBPOENA**

**RESPONSES AND OBJECTIONS TO
SUBPOENA *DUCES TECUM* FOR DOCUMENTS**

Non-party Thomas H. Stark serves the following responses and objections to A. E. Cabe's Subpoena *Duces Tecum* for Documents ("Subpoena"), which was filed in the above-referenced case on March 27, 2018, pursuant to Rule 45 of the North Carolina Rules of Civil Procedure.

GENERAL OBJECTIONS

1. The undersigned objects to the Subpoena because the Subpoena is procedurally defective on its face.
2. The only file in the possession of the undersigned is a client file, which is protected by the attorney-client privilege. The client has not consented to disclosure.

3. The undersigned objects to the Subpoena because the Subpoena requires disclosure of privileged or other protected matter and no exception or waiver applies to the privilege or protection, except for documents which were available to Mr. Cabe and are attached hereto as Exhibit A as a courtesy and without waiver of any rights.

4. The undersigned objects to the Subpoena because the Subpoena is unreasonable or oppressive in the following manner: (a) clarity of request, and (b) threat for nondisclosure.

5. The undersigned objects to the Subpoena because the Subpoena subjects the undersigned to an undue burden or expense by requiring the undersigned to review numerous e-mails for the client and to identify requested communications.

6. Nothing herein is intended to be or should be construed as a waiver of the attorney-client privilege, the work product doctrine, or any other protection. Inadvertent production of such protected information is not intended to be and shall not operate as a waiver of the applicable privilege.

7. The production of any documents or information by the undersigned is made without waiver, and with preservation, of any privilege or protection against disclosure afforded to documents containing confidential or proprietary information.

This the 6th day of April, 2018.

STARK LAW GROUP, PLLC

BY: 

Thomas H. Stark

NC Bar Number: 10052

Stark Law Group, PLLC

6011 Farrington Rd, Suite 300

Chapel Hill, NC 27517

Phone: (919) 490-5550

Fax: (919) 490-5551

Email: tom@starklawgroup.com

CERTIFICATE OF SERVICE

I hereby certify that this Written Objection to Subpoena was served via first

class mail upon:

A. E. Cabe

13 Haven Place

Canton, North Carolina 28716

This the 6th day of April, 2018.

STARK LAW GROUP, PLLC

BY: 

Thomas H. Stark

NC Bar Number: 10052

Stark Law Group, PLLC

6011 Farrington Rd, Suite 300

Chapel Hill, NC 27517

STATE OF NORTH CAROLINA
COUNTY OF HAYWOOD

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

DEBORAH KING, Vice Chair of
Haywood GOP,
Plaintiff,

v.

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

**WRITTEN OBJECTION TO
SUBPOENA**

**RESPONSE AND OBJECTION TO
SUBPOENA DUCES TECUM FOR DOCUMENTS**

Non-party Robin Hayes, in his capacity as Chairman of the North Carolina Republican Party (“Mr. Hayes”), through undersigned counsel, serves the following response and objection to A. E. Cabe’s Subpoena *Duces Tecum* for Documents (“Subpoena”), which was filed in the above-referenced case on March 27, 2018, pursuant to Rule 45 of the North Carolina Rules of Civil Procedure.

GENERAL OBJECTION

1. Mr. Hayes objects to the Subpoena on the grounds that the Subpoena from Mr. Cabe is procedurally defective on its face, pursuant to Rule 45.

2. Mr. Hayes objects to the Subpoena on the grounds that the Subpoena is unreasonable or oppressive in the following manner: (a) the Subpoena's request is unclear, and (b) the Subpoena asserts a threat for nondisclosure.

3. Mr. Hayes objects to the Subpoena on the grounds that responding to the Subpoena would subject him to an undue burden or expense.

This the 17th day of April, 2018.

STARK LAW GROUP, PLLC

BY: 

Thomas H. Stark

NC Bar Number: 10052

Attorney for NC Republican Party

Stark Law Group, PLLC

6011 Farrington Rd, Suite 300

Chapel Hill, NC 27517

Phone: (919) 490-5550

Fax: (919) 490-5551

Email: tom@starklawgroup.com

DEBORAH KING, Vice Chair of
Haywood GOP,
Plaintiff,

v.

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

**WRITTEN OBJECTION TO
SUBPOENA**

**RESPONSE AND OBJECTION TO
SUBPOENA *DUCES TECUM* FOR DOCUMENTS**

Non-party Michele Ann Nix, individually and in her capacity as Vice Chair of the North Carolina Republican Party (“Ms. Nix”), through undersigned counsel, serves the following response and objection to A. E. Cabe’s Subpoena *Duces Tecum* for Documents (“Subpoena”), which was filed in the above-referenced case on March 27, 2018, pursuant to Rule 45 of the North Carolina Rules of Civil Procedure.

GENERAL OBJECTION

1. Ms. Nix objects to the Subpoena on the grounds that the Subpoena from Mr. Cabe is procedurally defective on its face, pursuant to Rule 45.

Exhibit B3

2. Ms. Nix objects to the Subpoena on the grounds that the Subpoena is unreasonable or oppressive in the following manner: (a) the Subpoena's request is unclear, and (b) the Subpoena asserts a threat for nondisclosure.

3. Ms. Nix objects to the Subpoena on the grounds that responding to the Subpoena would subject her to an undue burden or expense.

This the 21 day of April, 2018.

STARK LAW GROUP, PLLC

BY: 

Thomas H. Stark

NC Bar Number: 10052

Attorney for NC Republican Party

Stark Law Group, PLLC

6011 Farrington Rd, Suite 300

Chapel Hill, NC 27517

Phone: (919) 490-5550

Fax: (919) 490-5551

Email: tom@starklawgroup.com

DEBORAH KING, Vice Chair of
Haywood GOP,
Plaintiff,

v.

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

**WRITTEN OBJECTION TO
SUBPOENA**

**RESPONSE AND OBJECTION TO
SUBPOENA *DUCES TECUM* FOR DOCUMENTS**

Non-party Dallas Woodhouse, in his capacity as Executive Director of the North Carolina Republican Party, (“Mr. Woodhouse”), through undersigned counsel, serves the following response and objection to A. E. Cabe’s Subpoena *Duces Tecum* for Documents (“Subpoena”), which was filed in the above-referenced case on March 27, 2018, pursuant to Rule 45 of the North Carolina Rules of Civil Procedure.

GENERAL OBJECTION

1. Mr. Woodhouse objects to the Subpoena on the grounds that the Subpoena from Mr. Cabe is procedurally defective on its face, pursuant to Rule 45.

Exhibit B4

2. Mr. Woodhouse objects to the Subpoena on the grounds that the Subpoena is unreasonable or oppressive in the following manner: (a) the Subpoena's request is unclear, and (b) the Subpoena asserts a threat for nondisclosure.

3. Mr. Woodhouse objects to the Subpoena because the Subpoena requires disclosure of privileged or other protected matter and no exception or waiver applies to the privilege or protection. Mr. Woodhouse believes that any documents or data he might have in his possession would consist of attorney-client communications.

4. Mr. Woodhouse objects to the Subpoena because responding to the Subpoena would subject him to an undue burden or expense.

This the 9th day of April, 2018.

STARK LAW GROUP, PLLC

BY: 

Thomas H. Stark

NC Bar Number: 10052

Attorney for NC Republican Party

Stark Law Group, PLLC

6011 Farrington Rd, Suite 300

Chapel Hill, NC 27517

Phone: (919) 490-5550

Fax: (919) 490-5551

Email: tom@starklawgroup.com

DEBORAH KING, Vice Chair of
Haywood GOP,
Plaintiff,

v.

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

**WRITTEN OBJECTION TO
SUBPOENA**

**RESPONSE AND OBJECTION TO
SUBPOENA *DUCES TECUM* FOR DOCUMENTS**

Non-party Aubery Woodard, in his capacity as Chairman of the 11th District of the North Carolina Republican Party (“Mr. Woodard”), through undersigned counsel, serves the following response and objection to A. E. Cabe’s Subpoena *Duces Tecum* for Documents (“Subpoena”), which was filed in the above-referenced case on March 27, 2018, pursuant to Rule 45 of the North Carolina Rules of Civil Procedure.

GENERAL OBJECTION

1. Mr. Woodard objects to the Subpoena on the grounds that the Subpoena from Mr. Cabe is procedurally defective on its face, pursuant to Rule 45.

Exhibit B5

2. Mr. Woodard objects to the Subpoena on the grounds that the Subpoena is unreasonable or oppressive in the following manner: (a) the Subpoena's request is unclear, and (b) the Subpoena asserts a threat for nondisclosure.

3. Mr. Woodard objects to the Subpoena on the grounds that responding to the Subpoena would subject him to an undue burden or expense.

This the 14 day of April, 2018.

STARK LAW GROUP, PLLC

BY: 

Thomas H. Stark

NC Bar Number: 10052

Attorney for NC Republican Party

Stark Law Group, PLLC

6011 Farrington Rd, Suite 300

Chapel Hill, NC 27517

Phone: (919) 490-5550

Fax: (919) 490-5551

Email: tom@starklawgroup.com

FILED
2018 APR 13 PM 1:06
HAYWOOD COUNTY, C.S.C.

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL.

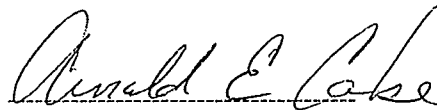
TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

Thomas Stark , Chief Legal Counsel North Carolina Republican Party:

You are advised of the time for production as well as the date of the materials requested in Your Subpoenas Duces Tecum dated 3/27/2018 at my house. A tentative schedule is at 1000 hours, 30 April 2018 at my house, located at
13 Haven Place ,
Canton NC 28716

If there is a change in time or date, you will be notified through your attorney, if you have one, if not, you will be notified telephonically if you forward your number.

Submitted this 13 day of April.



A.E. CABE, PRO SE

Exhibit
C1

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

TIME AND DATE FOR PRODUCTION OF REQUESTED MATRIALS

On this 13th day of April, 2018, a copy of attached TIME AND DATE FOR PRODUCTION OF REQUESTED MATRIALS was served by U.S. Mail with sufficient postage affixed directed to :

Robin Hayes Chairman North Carolina Republican Party
1506 Hillsborough St.
Raleigh, NC 27605

Michel Nix Vice Chair North Carolina Republican Party
1506 Hillsborough St.
Raleigh, NC 27605

Dallas Woodhouse Executive Director North Carolina Republican Party
1506 Hillsborough St.
Raleigh, NC 27605

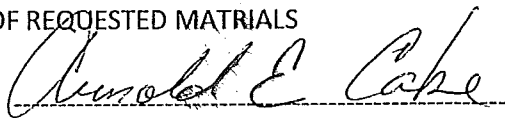
Thomas Stark Chief Legal Counsel North Carolina Republican Party
Stark Law Group
6011 Farrington Road, suite 300
Chapel Hill, NC 27517

Aubery Woodard Chairman 11th District North Carolina Republican Party
70 Cheestonaya Court
Brevard, NC 28712

And Hand delivered to the Haywood County Clerk of Court.

TIME AND DATE FOR PRODUCTION OF REQUESTED MATRIALS

On this 13th Day April 2018

A handwritten signature in cursive script, reading "Arnold E. Cabe", is written over a horizontal dashed line.

A.E. CABE, PRO-SE

STATE OF NORTH CAROLINA
COUNTY OF HAYWOOD

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL.

FILED
2018 APR 13 PM 1:06
HAYWOOD COUNTY, C.S.C.

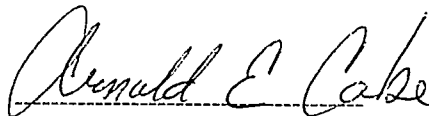
TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

Robin Hayes, Chairman North Carolina Republican Party:

You are advised of the time for production as well as the date of the materials requested in Your Subpoenas Duces Tecum dated 3/27/2018 at my house. A tentative schedule is at 1000 hours, 30 April 2018 at my house, located at
13 Haven Place ,
Canton NC 28716

If there is a change in time or date, you will be notified through your attorney, if you have one, if not, you will be notified telephonically if you forward your number.

Submitted this 13 day of April.



A.E. CABE, PRO SE

Exhibit C 2

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD

SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL.

FILED
2019 APR 13 PM 1:02
HAYWOOD COUNTY, C.S.C.

TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

Michele Ann Nix, Vice Chair North Carolina Republican Party:

You are advised of the time for production as well as the date of the materials requested in Your Subpoenas Duces Tecum dated 3/27/2018 at my house. A tentative schedule is at 1000 hours, 30 April 2018 at my house, located at

13 Haven Place ,
Canton NC 28716

If there is a change in time or date, you will be notified through your attorney, if you have one, if not, you will be notified telephonically if you forward your number.

Submitted this 13 day of April.



A.E. CABE, PRO SE

Exhibit C3

STATE OF NORTH CAROLINA
COUNTY OF HAYWOOD

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL.

FILED
2018 APR 13 PM 1:06
HAYWOOD COUNTY, C.S.C.

TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

Dallas Woodhouse, Executive Director North Carolina Republican Party:

You are advised of the time for production as well as the date of the materials requested in Your Subpoenas Duces Tecum dated 3/27/2018 at my house. A tentative schedule is at 1000 hours, 30 April 2018 at my house, located at
13 Haven Place ,
Canton NC 28716

If there is a change in time or date, you will be notified through your attorney, if you have one, if not, you will be notified telephonically if you forward your number.

Submitted this 13 day of April.



A.E. CABE, PRO SE

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD

SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL.

FILED
2018 APR 13 PM 1:06
HAYWOOD COUNTY, C.S.C.

TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

Aubrey Woodard, Chairman 11th District North Carolina Republican Party:

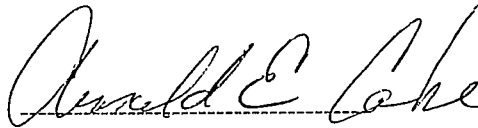
You are advised of the time for production as well as the date of the materials requested in Your Subpoenas Duces Tecum dated 3/27/2018 at my house. A tentative schedule is at 1000 hours, 30 April 2018 at my house, located at

13 Hayen Place,

Canton NC 28716

If there is a change in time or date, you will be notified through your attorney, if you have one, if not, you will be notified telephonically if you forward your number.

Submitted this 13 day of April.



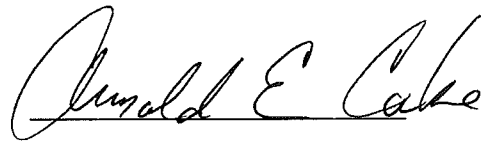
A.E. CABE, PRO SE

Exhibit C5

Michele Nix, Vice Chair North Carolina Republican Party,

Your reasons for your refusal to answer under NC statutes the Subpoena Duces Tecum served on you are disingenuous in that you failed to outline in detail, as required, your specific rather than generic reason, taken word for word from Section, of NCRCP of your refusal. You were advised of the possible penalty or consequences thereof for failure to provide or as a minimum attempt honestly to seek the requested information.

If you desire to clarify your reasons, you need to respond by 26 April 2018.

A handwritten signature in black ink that reads "Arnold E. Cabe". The signature is written in a cursive style with a horizontal line underneath the name.

A.E.Cabe, Pro-Se

Exhibit D 1

DALLAS WOODHOUSE, Executive Director North Carolina Republican Party

Your attempts to challenge your subpoena are ineffective and elementary. Your attorney, if he is so, wrote for you that the subpoena; if so you must state definitively, in what respect. Your response is expected by April 22. Your other excuses of a threat, not a threat, but required by NC laws for, perhaps, persons like yourself. Of course the privilege of Attny-Client is inviolate and most learned people would have recognized that. I will be seeking proof of that relationship, including documents, contracts and testimony of witnesses. I hope that you are correct. As for your final Attempts, you drug out the old, over-used: too burdensome and too expensive. I am of a different opinion and hopefully so will be our Judge.

If you desire to comply , you need to respond by 26 April 2018

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

A. E. Cabe PRO-SE

Exhibit
D 2

Thomas Stark
Stark Law Group PLLC
6011 Farrington Road
Suite 300
Chapel Hill, NC 27517

Dear Mr. Stark:

You have failed to remit to me evidence by documents of your claimed Attorney-Client relationship with

Robin Hayes ...Chairman North Carolina Republican Party

Michele NixVice Chair North Carolina Republican Party

Dallas WoodhouseExecutive director North Carolina Republican Party

Aubrey Woodard ...11th district chair North Carolina Republican Party

Your presumed or alleged clients have neglected to present proof of said relationship. Therefore, I am assuming that you have no evidence OR do not wish, for some reason, to reveal it. I do not have to remind you, their attorney, that your actions are contrary to regulatory and statutory authorities of the State of North Carolina.

Cutting to the chase, you have one more opportunity to clear this up if you submit to me by 3 May 2018, documentation to prove your claim of these four as your clients. If not, our correspondence will be brief from here on out. The Courts are better established to deal with those who respect not the authorities.

Sincerely,

April 24th 2018

A handwritten signature in cursive script that reads "A.E. Cabe".

A.E. Cabe PRO-SE

Exhibit E

STATE OF NORTH CAROLINA
COUNTY OF HAYWOOD

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

DEBORAH KING, Vice Chair of
Haywood GOP,
Plaintiff,

v.

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

**RESPONSE IN OPPOSITION
TO A.E. CABE'S FILING
DATED APRIL 13, 2018**

**RESPONSE IN OPPOSITION TO A.E. CABE'S FILING
DATED APRIL 13, 2018, ENTITLED TIME AND DATE FOR
PRODUCTION OF REQUESTED MATERIALS**

Non-parties Thomas H. Stark, in his capacity as counsel for the North Carolina Republican Party ("Mr. Stark"); Dallas Woodhouse, in his capacity as Executive Director of the North Carolina Republican Party ("Mr. Woodhouse"); Robin Hayes, in his capacity as Chairman of the North Carolina Republican Party ("Mr. Hayes"); Michele Ann Nix, in her capacity as Vice Chair of the North Carolina Republican Party ("Ms. Nix"); Aubery Woodard, in his capacity as Chairman of the 11th District of the North Carolina Republican Party ("Mr. Woodard"); collectively "the Non-Parties;" through undersigned counsel, serve the following response in opposition to A. E. Cabe's Filing dated April 13, 2018, entitled Time and Date for Production of

Exhibit F

Requested Materials ("Filing"), which was filed in the above-referenced case on April 13, 2018.

GENERAL OBJECTION

1. The Non-Parties incorporate by reference their previously served objections to the Subpoenas from Mr. Cabe in their entirety and allege the objections as if fully set forth herein.

2. The Non-Parties are responding to the Filing, whether served or unserved, and object to the Filing on the basis of lack of proper service.

3. Since the Filing is not a document contemplated by the North Carolina Rules of Civil Procedure, the Non-Parties do not believe that a response to Mr. Cabe's Filing is required; but to the extent that a response is required, the Non-Parties object to the Filing for the reasons specified in the previously served Objections as referenced in Paragraph 1 of this response.

This the 23rd day of April, 2018.

STARK LAW GROUP, PLLC

BY: _____

Thomas H. Stark

NC Bar Number: 10052

Attorney for NC Republican Party

Stark Law Group, PLLC

6011 Farrington Rd, Suite 300

Chapel Hill, NC 27517

Phone: (919) 490-5550

Fax: (919) 490-5551

Email: tom@starklawgroup.com

CERTIFICATE OF SERVICE

I hereby certify that this Response in Opposition to A. E. Cabe's Filing Dated

April 13, 2018 was served via first class mail upon:

A. E. Cabe
13 Haven Place
Canton, North Carolina 28716

This the 23rd day of April, 2018.

STARK LAW GROUP, PLLC

BY: 

Thomas H. Stark

NC Bar Number: 10052

Attorney for NC Republican Party

Stark Law Group, PLLC

6011 Farrington Rd, Suite 300

Chapel Hill, NC 27517

Phone: (919) 490-5550

Fax: (919) 490-5551

Email: tom@starklawgroup.com