

FILED

2018 MAY -9 PM 4:36

MAY 15 2018

DEBORAH KING,

Plaintiff,

HAYWOOD COUNTY, C. S. C.

BY _____

HAYWOOD REPUBLICAN ALLIANCE,

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

et al.

Defendant(s).

MOTION FOR PROTECTIVE
ORDER PURSUANT TO
N.C.G.S. 1A-26(c)


NOW COMES the Plaintiff and moves the Court pursuant to NCGS 1A Rule 26(c) to protect the Plaintiff and shows unto the court the following:

1. That Defendant Eddie Cabe served the Plaintiff with Interrogatories and Request for Admissions on March 6, 2018 and thereafter the Plaintiff secured on order extending time to answer to and including May 9, 2018.
2. That the Interrogatories and Request for Admissions are unreasonable, embarrassing and non-sequitur, and were done to harass the Plaintiff.
3. That the Defendants and others have exposed this complete court file on the internet through posts on social media to hundreds of people, and have sent emails to the State Court of Appeals Judge, among others.
4. That the Answers to these Interrogatories and Request for Admissions will be posted to members of the Jury pool in Haywood County, North Carolina which might prejudice either the Plaintiff or the Defendants.
5. The actions of Defendant Cabe and others in exposing such discoverable or non-discoverable information would and could have a chilling effect upon the administration of justice by this Court.

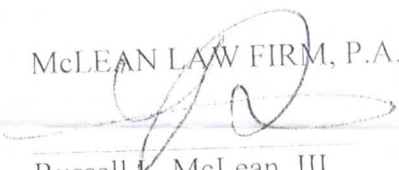
6. That the conduct of exposing the pleadings and discovery and its attendant commitments has been done to unreasonably annoy, harass, and been offered in an attempt to embarrass and oppress the Plaintiff and deny her access to the Courts for the harm caused to her including a posting that all she has to do is step down as Vice Chair of the County Party and this would all be over.

WHEREFORE, Plaintiff prays the Court as follows:

1. For an Order suspending the Plaintiff's duty to answer the Defendant's Interrogatories and Request for Admissions.
2. In the alternative, a discovery order protecting the Plaintiff's privacy during litigation for public documents.
3. That the Court limit the scope of discovery.
4. That discovery be conducted with only the parties and the same sealed to only be opened by the Court.
5. For reasonable attorney's fees to be awarded for the Defendant's filing of discovery in violation of the North Carolina General Rules of practice, specifically Rule 1.2.
6. For such other and further relief as the court may deem proper.

This the  day of May, 2018.

McLEAN LAW FIRM, P.A.


Russell E. McLean, III
Post Office 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 Notice and Motion by placing a copy of same in the U.S. mail, properly addressed and postage prepaid on the following:

FILED

2018 MAY 09 PM 4:36

WAYWOOD COUNTY, C.S.C.

Arnold E. Cabe
13 Haven Place
Canton, NC 28716

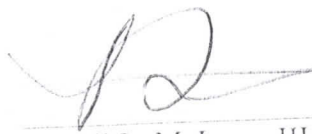
BY _____

C. Amanda Martin
Attorney for Defendants
7701 Haynes Street, Suite 100
Raleigh, NC 27604

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

Jeremy Davis
177 Rebel Ridge Road
Canton, NC 28716

This the 9th day of May, 2018.



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

FILED

2018 MAY -9 PM 4:41

MAY 15 2018

DEBORAH KING,

Plaintiff,

HAYWOOD COUNTY, C.S.C.

BY _____

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).

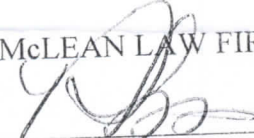
AMENDED
NOTICE OF HEARING
OF ALL DEFENDANT CABE'S
MOTIONS AND MOTION FOR
INJUNCTIVE RELIEF

PLEASE TAKE NOTICE that the undersigned will bring the all of Defendant Cabe's
Motions on for hearing before the court on the 11th day of June 2018, at 9:30 a.m., or as soon
thereafter as the court may hear same.

Plaintiff further moves the court to hear Plaintiff's claim for injunctive relief against the
named defendants at this hearing.

This the 9th day of May, 2018.

McLEAN LAW FIRM, P.A.



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

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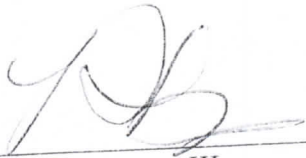
Arnold E. Cabe
13 Haven Place
Canton, NC 28716

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 2nd day of May, 2018.



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

FILED
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HAYWOOD COUNTY, C.S.C.
RY

STATE OF NORTH CAROLINA
HAYWOOD COUNTY

FILED

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

FILE NO: 18 CVS 116

2018 MAY 11 PM 1:44

HAYWOOD COUNTY, C.S.C.

MAY 15 2018

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),


NOTICE OF HEARING
NOTICE OF HEARING ON
MOTION FOR PROTECTIVE ORDER
PURSUANT TO NCGS 1A-26(C)

PLEASE TAKE NOTICE that the undersigned will bring the all of Defendant Cabe's Motions on for hearing before the court on the 11th day of June 2018, at 9:30 a.m., or as soon thereafter as the court may hear same.

Plaintiff further moves the court to hear Plaintiff's claim for injunctive relief against the named defendants at this hearing.

This the 11th day of May, 2018.

McLEAN LAW FIRM, P.A.


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CERTIFICATE OF SERVICE

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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 11th day of May, 2018.



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