

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD

2018 MAY 17 PM 1:20

SUPERIOR COURT DIVISION

HAYWOOD COUNTY, C.S.C

CASE NO. 18CVS 116

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL

AMENDMENT TO DEFENDANTS MOTION TO STRIKE PLAINTIFF;'S MOTION For PROTECTIVE ORDER

WHEREFORE, DEFENDANT CABE SEEKS THE COURT'S PERMISSION TO AMEND HIS MOTION  
TO STRIKE FILED 5/17/2018

THE reasoning for this request is to specify Counsel's violations of Rule 11, NCRC Procedure; in order to clarify, in details, most of Counsel's erroneous presentations to this Court. He and his Employer, the Plaintiff violated the provisions of Rule 11 b (1)(2)(3) in that he alleged, in some Cases, misconduct without an offender ,i.e. filing of public documents on Facebook and sending same to an Appellate Judge. It is unknown if either of these is a violation of NC laws, HOWEVER, the latter might be as this disclosure does excuse him from sitting on this case. He violates the cited authorities by alleging with signature that the "assertions are truthful and there is evidence to prove Plaintiff's charges"; if there is evidence said Counsel has failed to produce any by testimony, affidavit, deposition or any authorized method.

His Motion is simply a ploy to divert attention from his failure and refusal to cooperate with the undersigned in moving this case towards a conclusion. Although his actions have been documented in other filings, it is critical to point out his failures, by going on a vacation during the busiest portion of the discovery; THEN failing to outline this reason for his request for 30 days enlargement on the answers(not received to date)to interrotatories /request for documents, 1st set. An inexperienced Asst. Clerk failed to press him for a legitimate reason; this Counsel was guilty of misrepresentation in this instance.

The motive behind Counsel's machinations is simply to placate his Client, moreover, to hide her Evidence of mental disorders, i.e. prescriptions, visits for Psychological problems, evidence leading to other witnesses who may corroborate Defendant's inquiries into Plaintiff's background.

He violates the provisions as outlined by stating matters throughout his Motion that are, not Only untrue but are unbelievable.

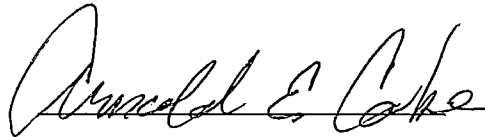
See LANE V WINN DIXIE, 169 NCAPP180; JOHNS V JOHNS, 195

NC APP 201, BROWN V HURLEY, 124 NCAPP 377.

The experiences of the Movant herein is that it is much harder to entrap one engaged in mendacity than an honest, but misguided Party.

To deal with all the unrealed, undocumented and, likely, untrue allegations; Defendant denies paras 2 and 3; para 4 in re posting public items to the Jury Panel has no factual basis,, merely a figment of Counsel's imagination; para 5 is intelligible but denied anyway; para 6 is too general in its objections to Defendant's discovery but violates Rule 11 by not being succinct and specific. Defendant adopts the Prayers Outlined in the Motion to which this Amendment is attached.

RESPECTFULLY SUBMITTED, this 17<sup>th</sup> day of May, 2018.

A handwritten signature in cursive script, appearing to read "A.E. Cabe".

A.E. CABE, PRO SE

SERVICE NOTICE

FILED

STATE OF NORTH CAROLINA

2018 MAY 17 PM 1:20

COUNTY OF HAYWOOD

HAYWOOD COUNTY, C.S.C

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

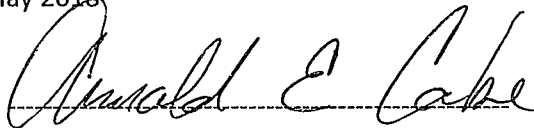
AMENDMENT TO DEFENDANTS MOTION TO STRIKE PLAINTIFF;'S MOTION For  
PROTECTIVE ORDER

On this 17<sup>th</sup> day of MAY, 2018, a copy of attached AMENDMENT TO DEFENDANTS MOTION TO STRIKE  
PLAINTIFF;'S MOTION For PROTECTIVE ORDER 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 DEFENDANTS MOTION TO STRIKE PLAINTIFF;'S MOTION For PROTECTIVE ORDER

On this 17<sup>th</sup> Day of May 2018,



A.E. Cabe PRO\_SE

STATE OF NORTH CAROLINA  
COUNTY OF HAYWOOD

FILED IN THE GENERAL COURT OF JUSTICE  
MAY 17 11:03 AM SUPERIOR COURT DIVISION  
HAYWOOD COUNTY, C.S.C. CASE NO. 18CVS 116

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

MOTION TO STRIKE ALL OF PLAINTIFF'S REQUESTED PROTECTIVE ORDER

NOW COMES Defendant Cabe and Moves this Honorable Court to Strike Plaintiff's Motion For a Protective Order for these reasons:

The matters alleged by Plaintiff in said Motion are, at the least, irrelevant, scandalous, untrue as well as frivolous, a sham on the Court and a departure from the matters alleged in her Complaint.

MOREOVER, her allegations without an alleged offender and complaints against legal events are an insult to N.C. statutes, the Defendant Cabe and this Court; her Motion should be stricken as well as her Complaint; to continue to try to present an orderly defense in the face of such outrageous conduct by Plaintiff is daunting;

THEREFORE, DEFENDANT PRAYS FOR a DISMISSAL of Plaintiff's Motion for Protective Order for the Reasons stated AND; in view of Plaintiff's aberrant behavior towards the Court and Opposing Parties, Defendant Prays for a Dismissal of her Complaint.


Defendant Cabe's Legal Authorities to Strike:

SIMPSON V SPECIALITY, 121FRD 261, MDNC, 1988

KRON M ED. V GROTH, 119 FRD 636, MDNC, 1988

MEDLIN V ANDREW, 113 FRD650, MDNC, 1987

RESPECTFULLY SUBMITTED, this 17<sup>th</sup> day of May, 2018.



A.E. CABE, PRO SE

SERVICE NOTICE

FILED

2018 MAY 17 AM 10:31

HAYWOOD COUNTY, C.S.C

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL.

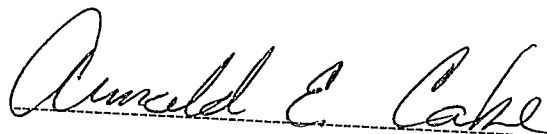
MOTION TO STRIKE ALL OF PLAINTIFF'S REQUESTED PROTECTIVE ORDER

On this 17<sup>th</sup> day of MAY, 2018, a copy of attached MOTION TO STRIKE ALL OF PLAINTIFF'S REQUESTED PROTECTIVE ORDER 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 STRIKE ALL OF PLAINTIFF'S REQUESTED PROTECTIVE ORDER

On this 17<sup>th</sup> Day of May 2018



A.E. Cabe PRO\_SE

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

FILED  
2018 MAY 14 AM 11:30  
HAYWOOD COUNTY, C.S.C.

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.

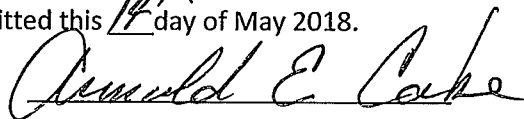
MOTION UP NCRCIVIL PROCEDURE RULE 37 (A) 2 FAILURE TO ANSWER INTERROGATORIES

NOW COMES Defendant Cabe and moves this Honorable Court to issue an order directed to Plaintiff requiring her to answer 33 interrogatories as well as requests for documents that Plaintiff has had for 68 days without attempting to offer any excuse to Defendant for her failure. Plaintiff's conduct is unreasonable, illegal and defiant of the cited authority in the heading of this Motion. Instead of trying to work out arrangements for answering said interrogatories and producing designated documents, Plaintiff filed a misguided Motion defying all the interrogatories without complying with NCRCP rules when a Party disagrees with a requested interrogatory. Such conduct by Plaintiff is unacceptable from a member of the NC Bar and; the Defendant seeks sanctions of attorney's fees and court costs for Plaintiff's irrational acts.

WHEREFORE, DEFENDANT PRAYS that this motion be granted AND Plaintiff be mandated to answer said interrogatories and deliver requested documents posthaste without delay AND; any delay of more than four days from date of order, shall receive sanctions;

Defendant seeks further relief as deemed appropriate.

Respectfully Submitted this <sup>14<sup>th</sup></sup> day of May 2018.



A.E.CABE, PRO SE

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 MAY 14 AM 11:30  
HAYWOOD COUNTY, C.S.C.

MOTION UP NC RULES of CIVIL PROCEDURE RULE 37 (A) 2 FAILURE TO ANSWER

INTERROGATORIES

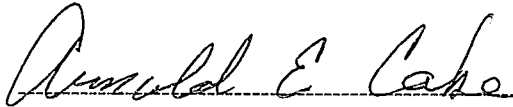
On this 14<sup>th</sup> day of MAY, 2018, a copy of attached MOTION UP NC RULES of CIVIL PROCEDURE RULE 37 (A) 2 FAILURE TO ANSWER INTERROGATORIES was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786.

And Hand delivered to the Haywood County Clerk of Court.

MOTION UP NC RULES of CIVIL PROCEDURE RULE 37 (A) 2 FAILURE TO ANSWER

INTERROGATORIES

On this 14<sup>th</sup> Day of May 2018



A.E. Cabe PRO\_SE

STATE OF NORTH CAROLINA  
HAYWOOD COUNTY

FILED

2018 MAY 11 PM 1:44

HAYWOOD COUNTY, C.S.C.

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

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),

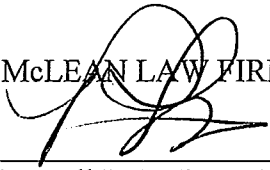
**NOTICE OF HEARING**  
**NOTICE OF HEARING ON**  
**MOTION FOR PROTECTIVE ORDER**  
**PURSUANT TO NCGS 1A-26(C)**

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 11<sup>th</sup> 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



## 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 upon the following:

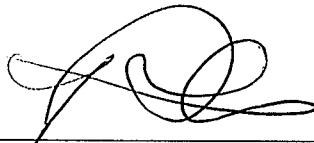
Arnold E. Cabe  
13 Haven Place  
Canton, NC 28716

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 11<sup>th</sup> day of May, 2018.



---

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

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD

2018 MAY 10 PM 2:33

SUPERIOR COURT DIVISION

HAYWOOD COUNTY, C.S.C.

CASE NO. 18CVS 116

BY RT

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

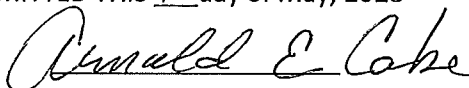
A.E. CABE, ET. AL.

MOTION FOR SANCTIONS UP RULES 37 AND 33 NCRCPROCEDURE

NOW COMES THE PLAINTIFF and shows this Honorable Court the following: Over 60 days ago Plaintiff served on Plaintiff 33 Interrogatories as well as Requests to Produce certain documents; all of these submissions were and are essential, necessary, And critical to Defendant Cabe's Defense to the allegations of Plaintiff's Complaint; AND The background behind Plaintiff's Failures were the decision of her Counsel to go 'bird Hunting' in South America in late March and early April. He, upon rendered unto the Asst. Clerk Haywood County Clerk of Court, a lame excuse that he had been 'busy or occupied' not Considered a legitimate by most Attorneys. Now this latest 30 day extension has elapsed, Without any communication from said Counsel ; AND Defendant Cabe has not been able to Formulate his complete defense, solely because of Counsel's failures to show respect For the NC Rules of Civil Procedure; AND It is mandatory that he comply with the cited authorities and, as well, suffer sanctions as Determined by this Honorable Court, with costs , attorneys Fees and such other measures as deemed appropriate.

DEEFENDANT PRAYS that this Court inquire into this motion, granting such relief and sanctions As deemed appropriate.

RESPECTFULLY SUBMITTED THIS 10<sup>th</sup> day of May, 2018.



A.E.CABE, PRO SE EDDIE CABE

SERVICE NOTICE

FILED

STATE OF NORTH CAROLINA

2018 MAY 10 PM 2:33

COUNTY OF HAYWOOD

HAYWOOD COUNTY, C.S.C.

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

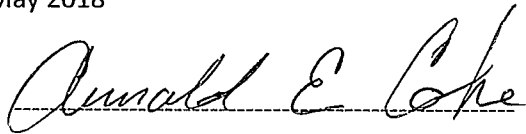
MOTION FOR SANCTIONS UP RULES 37 AND 33 NCRCPROCEDURE

On this 10<sup>th</sup> day of MAY, 2018, a copy of attached MOTION FOR SANCTIONS UP RULES 37 AND 33 NCRCPROCEDURE 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 FOR SANCTIONS UP RULES 37 AND 33 NCRCPROCEDURE

On this 10<sup>th</sup> Day of May 2018



A.E. Cabe PRO\_SE

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD

2018 MAY 10 PM 2:32

SUPERIOR COURT DIVISION

HAYWOOD COUNTY, C.S.C.

CASE NO. 18CVS 116

BY \_\_\_\_\_

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

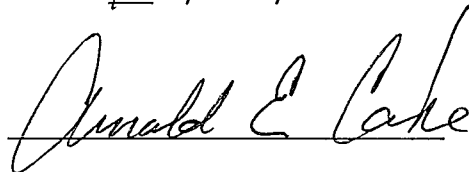
A.E. CABE, ET. AL.

MOTION TO ADD AFFIDAVITS TO MOTION FOR PSYCHIATRIC EXAM

NOW COMES Defendant Cabe requesting this Honorable Court to permit the supplementation Of Motion to Order a Psychiatric Exam of Plaintiff, WITH Attached Affidavits: These Affidavits were not submitted with the original Motion for Psychiatric Exam as they were not available; it required severe mental processes to recall with specificity the events outlined in said Affidavits AND put these recollections into coherent narratives of Plaintiff's words regarding 'threats' to her family. These personal interplays with Plaintiff, bolster Defendant's seeking of stated EXAM.; this medical determination of Plaintiff's mental condition is necessary in order to insure all Parties that Plaintiff is mentally fit for this arduous trial.

WHEREFORE, Defendant Cabe Prays For The Acceptance and Melding of These Affidavits With Filed Motion For Said Psychiatric Exam To Present To This Honorable Court a more complete picture of Plaintiff's Mental Difficulties AND; Other Such Considerations as Deemed Appropriate.

Respectfully Submitted this 10<sup>th</sup> day of May 2018.



A.E. CABE, PRO-SE

10am  
~~FILED~~

SERVICE NOTICE

FILED

2018 MAY 10 PM 2:32

HAYWOOD COUNTY, C.S.C.

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

A+B

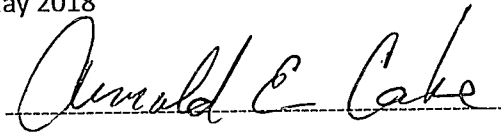
MOTION TO ADD AFFIDAVITS TO MOTION FOR PSYCHIATRIC EXAM

On this 10<sup>th</sup> day of MAY, 2018, a copy of attached MOTION TO ADD AFFIDAVITS TO MOTION FOR PSYCHIATRIC EXAM was served by U.S. Mail with sufficient postage affixed directed to Russell L. McLean at P.O. Box 4 Waynesville, N.C. 28786.

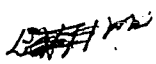
And Hand delivered to the Haywood County Clerk of Court.

MOTION TO ADD AFFIDAVITS TO MOTION FOR PSYCHIATRIC EXAM

On this 10<sup>th</sup> Day of May 2018



A.E. Cabe PRO\_SE



AFFIDAVIT IN SUPPORT OF MOTION TO REQUIRE PLAINTIFF TO SUBMIT  
TO PSYCHIATRIC EXAMINATION

The within is true and accurate to the best of my memory; I worked on Denny Kings Campaign for Haywood County Commissioner for 3 consecutive campaigns 2010- 2012- 2014, I attended his events and worked the early voting and election day polling places, handed out his information, and placed his campaign signs all over my end on the County. The morning after the November election of 2014, which Denny King lost Again by a small percentage, Debbie King called me on the phone extremely upset to the point of tears claiming the election had been rigged by the Haywood County Commissioners. She went on to say that the commissioners had gotten someone to break into the First united Methodist Church on Newfound St in Canton and change the voting results on the voting machines. Ms. King said it was a Conspiracy to keep Denny out of Office, and was begging me to contact the North Carolina Board of Elections and file a formal complaint accusing them of wrong doing.

I did some checking and found out this was a high school student who had run away from home and was cold and broke the church window to get warm of find a blanket, the Canton PD and the Haywood Sheriff investigated, the Haywood Board of elections was called and also investigated and I was told the voting machines' had not been tampered with. I did not file any complaint. I relayed this information to Ms. King, but she refused to change her mind, got even more upset, and stated on the phone that it was a good thing that Denny had been cheated out of the Election because she had information that the County Commissioners had planned to have Denny King Assassinated if he had won the election. Ms. King was in tears and appeared to me to be in extreme emotional distress.

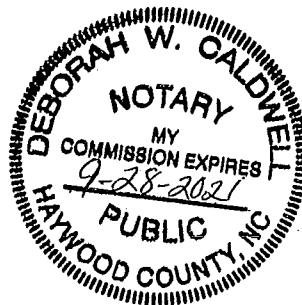
Oddly enough at the next GOP meeting Ms. King was laughing and acting very happy.

Arnold E. Cabe

A. E. Cabe

SIGNED AND SWORN TO BEFORE ME THIS 10<sup>th</sup> DAY OF MAY, 2018  
NOTARY PUBLIC, HAYWOOD CO., NC

State of NC, County of Haywood  
Signed before me on this 10<sup>th</sup> day  
May, 2018 by Arnold E. Cabe  
Notary Public Deborah W. Caldwell



EXH A

AFFIDAVIT IN SUPPORT OF MOTION TO REQUIRE PLAINTIFF TO SUBMIT  
TO PSYCHIATRIC EXAMINATION

The within is true and accurate to the best of my memory; ON the General Election Night in 2016, My wife, Phyllis , assisted in setting up for the ncelebration at the HCGOP Hqs. at that time on Walnut Street in the strip shopping Center, just off Russ Ave, Waynesville, NC 28786. I believe that it started at 2000 hours the food and refreshments. Lynda Bennett was working with the TV setup, trying to get the national results. At some time a bit later the two of us, myself and Phyllis, were talking with Deborah King, just making small talk, when she said emphatically, that someone had threatened her daughter over the phone, that they would kill her. We were shocked and awaited her explanation of the action taken to notify the authorities. There was nothing else said by her about protecting the daughter. It was almost as if the incident had not occurred. Deborah went on with her socializing without any tears being shed or our hearing this mentioned again.

She knew neither myself or my wife hardly at all. We did discuss the bizarre incident on the way home. I only had one question...how can one be so casual about a threat to her child?

*K G Watson*

K.G.WATSON

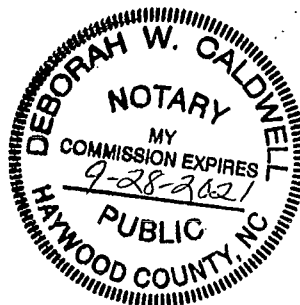
SIGNED AND SWORN TO BEFORE ME THIS

*10<sup>th</sup>*  
DAY OF MAY, 2018

State of NC County of Haywood  
Signed before me on this 10 day  
of May, 2018 by K.G. Watson  
Notary Public Deborah W. Caldwell

NOTARY PUBLIC, HAYWOOD CO., NC

*DWB*



STATE OF NORTH CAROLINA  
HAYWOOD COUNTY

FILED

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

2018 MAY -9 PM 4:37 FILE NO: 18 CVS 116

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),


**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



**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 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 MAY -9 PM 4:40  
WAYWOOD COUNTY, C.S.C.

This the 9<sup>th</sup> day of May, 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 MAY -9 PM 4: 36

HAYWOOD COUNTY, N.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 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.

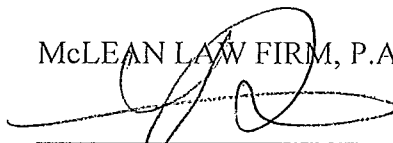
6. That the conduct of exposing the pleadings and discovery and its attendant commitments has been done to unreasonably annoy, harass, and been offered in an attempt to embarrass and oppress the Plaintiff and deny her access to the Courts for the harm caused to her including a posting that all she has 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 9<sup>th</sup> 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 FILED

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 upon the following: HAYWOOD COUNTY, C.S.C.

Arnold E. Cabe  
13 Haven Place  
Canton, NC 28716

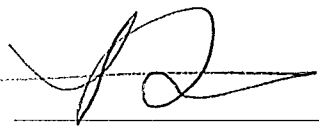
BY \_\_\_\_\_

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 9th day of May, 2018.



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

STATE OF NORTH CAROLINA  
COUNTY OF HAYWOOD

FILED  
2018 MAY -8 PM 4:07  
HAYWOOD COUNTY, C.S.C.  
RY \_\_\_\_\_

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.

DEFENDANT'S SECOND SET OF ADMISSIONS AND REQUEST FOR DOCUMENTS

NOW COMES Defendant Cabe herein and submits his Second Set of Admissions to the Plaintiff UP Rule 36,, NC Rules of Civil Procedure, for her completion:

1. Admit that you have consulted a Psychiatrist or Psychologist for medical reasons during the past 12 months:
2. Admit that you lost nothing if your likeness was appropriated:
3. Admit that your selection of 6 alias plures was and is a ploy to frighten the HRA members:
4. Admit that you need money so bad that you brought this suit:
5. Admit that you were encouraged by someone to engage in this lawsuit.

6. Admit that you knew of your Counsel taking the trip to South America recently:

7. Admit that the false information/photos submitted by you with your complaint, was taken from Facebook, a medium used by millions of persons, to surface innocent information:

8. Admit that Kenneth Henson refused to join in this lawsuit with you;

9. Admit that your request for \$75000 in this suit is just a product of your avaricious psyche:

10. Admit that you have your photos on Facebook, regardless of their origin:

11. Admit that your legal research as stated by your Spouse, failed to identify any other case of such de minimis non avant lex (trifling) , in N.C or any surrounding state:

12. Admit that your actions in this case display your temperament and veracity exactly:

13. Admit that you have requested others to testify for you in this case AND been refused:

14. Admit that your actions jeopardize the GOP being successful in Haywood County in the General Election this November:

15. Admit that you know nothing of a Counterclaim filed against you in this case on May 4th, 2018:

16. Admit that you do your research as you lack the funds to properly conduct your legal journey:

17. Admit that it is unwise for a layperson to do legal research for herself and her attorney:

18. Admit that your legal bills to date, have exceeded your expectations:

19. Admit that it took you over 6 months to determine to litigate AND this uncertainty was due to family disagreements over your ability to collect damages:

20. Admit that your support (non-financial) from local GOP leaners is paltry and they see you going down to ruin as a result of your suit:

DEFENDANT'S SECOND SET OF DOCUMENT REQUEST

FILED  
2016 MAY -8 PM 4:07  
WAYWOOD COUNTY, C.S.C.

1. Defendant Cabe hereby renews his First Request for Documents: Dated March 2, 2018
2. It is requested that Plaintiff provide any and all cancelled checks or on-line copies of disbursements for 6 months for medicines or medical bills for Psychiatrists/Psychologists;
3. Charge card records reflecting any expenses as outlined in Para 2 herein;
4. Any correspondence of any nature from Thomas Stark, NCGOP, Raleigh , within the past 100 days as well as copies of any cancelled checks from him to Plaintiff;
5. Any correspondence from Aubrey Woodward, 11th District, GOP, Official AND personal checks from him to Plaintiff, within 100 days;
6. Deliver all these for the past 10 months: copies of any/all correspondence/emails sent by you or received by you, not from your attorney, from other parties that mention this lawsuit or any lawsuit involving you.
7. Any documentation or records that you've received from any person with the NCGOP in Raleigh regarding the buttons, their production and delivery to any third party, including e-mails. Faxes or regular mail during the past 6 months.



8. Copies of any tickets, invitations, notices of any fundraising events for your lawsuit within the last 6 months; including a copy of any attendees to include a guest speaker

9. Any records, memos, bank deposits or similar of any amounts received from donors and their names within the past 6 months.

RESPECTFULLY SUBMITTED, this 8 day of May 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 dashed line.

A.E. CABE PRO\_SE

SERVICE NOTICE

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

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

FILED  
MAY 14 2018  
4:07 PM  
HAYWOOD COUNTY, C.S.C.

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE,

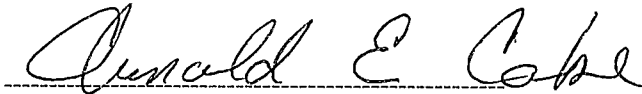
JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

DEFENDANT'S SECOND SET OF ADMISSIONS AND REQUEST FOR DOCUMENTS

On this 8 day of MAY, 2018, a copy of attached DEFENDANT'S SECOND SET OF ADMISSIONS AND REQUEST FOR DOCUMENTS 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.

DEFENDANT'S SECOND SET OF ADMISSIONS AND REQUEST FOR DOCUMENTS

On this 8 Day of May 2018



A.E. Cabe PRO\_SE

HAYWOOD COUNTY CLERK OF COURT

L135825            05/21/18 10:11:15

PAYOR: MILLER, MONROE

PAYEE: COPIES

CASE#:            VCAP:N

CITAH:

21410 COPY FEES            10.00

TOTAL PAID            10.00

CA TENDERED            20.00

CHANGE            10.00

5781 ID C43RCB