

OCT 26 2023

STATE OF NORTH CAROLINA

In the General Court of Justice

District Court Division

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2023 OCT 25 P 3:26  
HAYWOOD CO., N.C.

Haywood County

File No.: 23CVD845

Terry Ramey, Plaintiff/Victim

vs.

Cory Vaillancourt, Defendant

**MOTION FOR DISCOVERY**

Terry Ramey, the Plaintiff in the above-mentioned civil case, respectfully submits this Motion for Discovery pursuant to North Carolina Rules of Civil Procedure, Rule 33, Rule 34, and Rule 36. The purpose of this Motion for Discovery is the request by Plaintiff to seek the Court's permission to conduct discovery in this matter and hereby further requests that the following forms of discovery.

Interrogatories propounded upon the Defendant, attached as Exhibit A.

Request for Production of Documents propounded upon the Defendant, attached as Exhibit B.

Request for Admissions to the Defendant, attached as Exhibit C.

Depositions of the following parties, attached as Exhibit D.

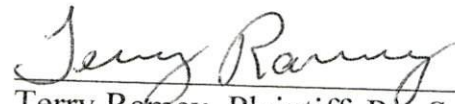
Plaintiff believes this discovery is necessary and essential in this case to clarify issues, gather relevant evidence, and to ensure fair and just resolution of this matter.

Plaintiff proposes a discovery period of thirty (30) days from the date of this Motion.

Plaintiff certifies that he has conferred or attempted to confer with the Defendant's attorney in a good faith effort to resolve discovery disputes but has been unable to do so.

Plaintiff respectfully requests that the Court grant this Motion for Discovery and permit the discovery described herein.

Dated this 25 day of October, 2023.



Terry Ramey, Plaintiff, Pro Se

72 Dakota Drive

Clyde, NC 28721

(828) 550-7638

terryramey2017@gmail.com

Exhibit A

STATE OF NORTH CAROLINA

In the General Court of Justice

District Court Division

2023 OCT 25 12:32:26  
DISTRICT COURT DIVISION

Haywood County

File No.: 23 CVD 845

Terry Ramey, Plaintiff/Victim

vs.

Cory Vaillancourt, Defendant

**PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Terry Ramey, the Plaintiff in the above-mentioned civil case, serves upon Cory Vaillancourt Defendant, the following written interrogatories under the provisions of Rule 33 of the North Carolina Rules of Civil Procedure.

Defendant is required to answer these interrogatories separately and fully in writing under oath and to serve a copy of his answers on the undersigned within thirty (30) days after the service hereof.

These interrogatories shall be continuing in nature until the date of trial, and you are required to serve supplemental answers as additional information may become available to you.

Where any question herein is inapplicable, please indicate same and state with particularity why said question is in applicable. Any reference to spouse or spouses refers to the parties in this action.

1. Please state your full name; date of birth; residence and post office address; home telephone number; cell phone number and name of mobile carrier; each business name, address, and telephone number that employs you; and all mobile, cellular, digital or pager telephone numbers. Please also state your full email addresses with internet provider for each email address you have individually or through an employer for the past seventeen (17) years preceding the answering of these interrogatories.

2. What is your present employment, including your employer's name, address, type of work done position, length of employment.
  
3. Have you, or anyone on or behalf ever harassed, recorded, intercepted, videotaped Plaintiff? If so, please indicate the date of said harassment, the dates of said recording, the date of said interception, or the video/audio taping.
  
4. Within the last seventeen (17) years, have charges, allegations, or complaints been filed or made against you for disturbing the peace, harassing any person individually or in their professional capacity? If so, please indicate the name and address of the person, the charges or allegations made, and location in which said issues occurred.

5. Please state the names and addresses of any and all witnesses you plan to call to testify, and the substance of each witnesses' testimony.

This 25 day of October, 2023.

  
\_\_\_\_\_  
Terry Ramey, Plaintiff, Pro Se  
72 Dakota Drive,  
Clyde, NC 28721  
(828) 550-7638  
terryramey2017@gmail.com



STATE OF NORTH CAROLINA

In the General Court of Justice

District Court Division

FILED  
2023 OCT 25 P 3:26  
WYOMING COUNTY, N.C.

Haywood County

File No.: 23CVD845

Terry Ramey, Plaintiff/Victim

vs.

Cory Vaillancourt, Defendant

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Terry Ramey, the Plaintiff in the above-mentioned civil case, serves upon Cory Vaillancourt Defendant, the following written request for production of documents under the provisions of Rule 34 of the North Carolina Rules of Civil Procedure.

Notice is hereby given to Defendant to produce for or permit the Plaintiff to inspect or copy the requested documents or tangible things so requested to be produced in this document in accordance with Rule 34 at the residence of Terry Ramey, 72 Dakota Drive, NC 28721 on or before a date of thirty (30) days after service of this document on you.

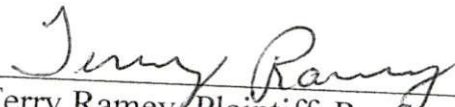
In lieu of said production for copying, Defendant may submit to Plaintiff as is requested herein, exact copies of the requested documents clearly designating to which request each such document pertains.

Where any request herein is inapplicable, please indicate same and state with particularity why said document is inapplicable.

1. Please produce copies of all text messages, voice mails, emails, and written correspondence among yourself and any Haywood County North Carolina Commissioners between (a) November 8, 2022 and February 1, 2023 and (b) May 1, 2023 and June 30, 2023.

2. Please produce back up copies for any recorded video or audio material relevant to interviews or conversations with Haywood County Commissioners for the time periods of (a) November 8, 2022 and February 1, 2023 and (b) May 1, 2023 and June 30, 2023.
3. Please produce exact copies of relevant articles or cartoon images created/written by you or Andy Bailey about the Plaintiff or Haywood County Commissions for the time periods of (a) November 8, 2022 and February 1, 2023 and (b) May 1, 2023 and June 30, 2023.
4. Please provide stored information concerning the storing of voicemail messages including if there is an option for storing messages, how long they remain on the system, and are the messages automatically purged.
5. Please provide phone records from Defendant's cell phone provider in a file format that can be searched for telephone numbers for the time periods of (a) November 8, 2022 and February 1, 2023 and (b) May 1, 2023 and June 30, 2023.

This 25 day of October, 2023.

  
Terry Ramey, Plaintiff, Pro Se  
72 Dakota Drive  
Clyde, NC 28721  
(828) 550-7638  
terryramey2017@gmail.com

STATE OF NORTH CAROLINA

In the General Court of Justice

District Court Division

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HAYWOOD CO., N.C.

Haywood County

File No.: 23CVD845

Terry Ramey, Plaintiff/Victim

vs.

Cory Vaillancourt, Defendant

**PLAINTIFF'S REQUEST FOR ADMISSIONS**

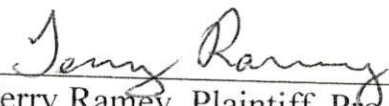
Terry Ramey, the Plaintiff in the above-mentioned civil case, serves upon Cory Vaillancourt Defendant, the following written request for production of documents under the provisions of Rule 36 of the North Carolina Rules of Civil Procedure.

1. Please admit that Defendant colluded with Haywood County Commissioners to create articles in the "Smoky Mountain News" on January 17, 2023 for Haywood Commissioners to issue a joint statement Plaintiff.
2. Please admit that Defendant aggressively harassed Plaintiff at the Haywood County Courthouse on June 5, 2023.
3. Please admit that the harassment stated in Request 2 above was recorded on film by the security cameras in the courthouse for which copies are available and will be produced.
4. Please admit that harassment depicted in the 20 second video taken in the Haywood County Courthouse on June 5, 2023 was posted on the Internet.



5. Please admit that Defendant recorded on Defendant's cell phone the entire harassment episode on his cell phone on June 5, 2023
6. Please admit that Defendant continued to write and publish in the Smoky Mountain News article about Plaintiff that defamed Plaintiff by using names such as "three-time loser," "tax cheat," "unqualified," "Howdy Dowdy," and "elected by uninformed voters".
7. Please admit that Defendant stated that "as of December 22, 2022 no tax payments had been made by Plaintiff"; however, Plaintiff had established a structured tax payment plan with Haywood County in September 2022.

This \_\_\_\_ day of October, 2023.

  
\_\_\_\_\_  
Terry Ramey, Plaintiff, Pro Se  
72 Dakota Drive  
Clyde, NC 28721  
(828) 550-7638  
terryramey2017@gmail.com

STATE OF NORTH CAROLINA  
In the General Court of Justice  
District Court Division  
OCT 25 P 3 26  
WAYNES CO., N.C.

Haywood County

File No.: 23CVD845

Terry Ramey, Plaintiff/Victim

vs.

Cory Vaillancourt, Defendant

**PLAINTIFF'S REQUEST FOR DEPOSITIONS**

Terry Ramey, the Plaintiff in the above-mentioned civil case, serves upon Cory Vaillancourt Defendant, the following written request for deposition under the North Carolina Rules of Civil Procedure for the below-stated individuals.

- 1. Cory Vaillancourt, Defendant
- 2. Joey Webb Jr.
- 3. Bryant Morehead
- 4. Kevin Ensley

This 25 day of October, 2023.

  
 Terry Ramey, Plaintiff, Pro Se  
 72 Dakota Drive  
 Clyde, NC 28721  
 (828) 550-7638  
 terryramey2017@gmail.com