

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.

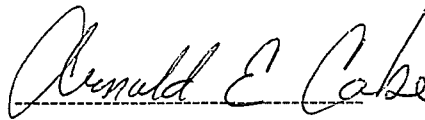
TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

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

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

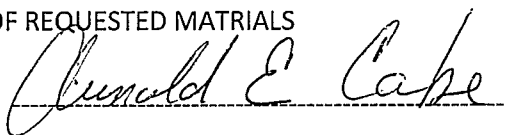
Thomas Stark Chief Legal Counsel North Carolina Republican Party
Stark Law Group
6011 Farrington Road, suite 300
Chapel Hill, NC 27517

Aubery Woodard Chairman 11th District North Carolina Republican Party
70 Cheestoonaya 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 "A.E. Cabe", written over a horizontal dashed line.

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 1:02
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

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

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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

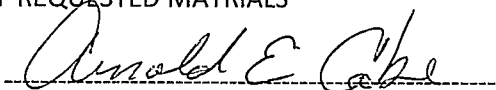
Thomas Stark Chief Legal Counsel North Carolina Republican Party
Stark Law Group
6011 Farrington Road, suite 300
Chapel Hill, NC 27517

Aubery Woodard Chairman 11th District North Carolina Republican Party
70 Cheestoonaya 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.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**

**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.

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

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 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

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.

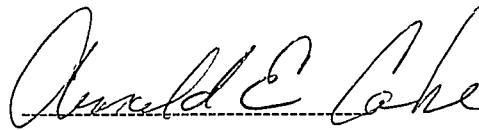
TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

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

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

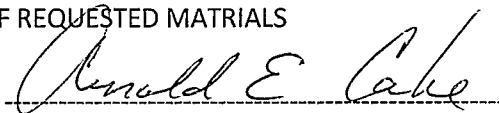
Thomas Stark Chief Legal Counsel North Carolina Republican Party
Stark Law Group
6011 Farrington Road, suite 300
Chapel Hill, NC 27517

Aubery Woodard Chairman 11th District North Carolina Republican Party
70 Cheestoonaya 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
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 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.

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

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 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

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.
BY _____

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

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

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1506 Hillsborough St.
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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

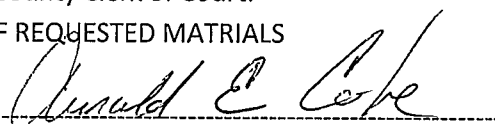
Thomas Stark Chief Legal Counsel North Carolina Republican Party
Stark Law Group
6011 Farrington Road, suite 300
Chapel Hill, NC 27517

Aubery Woodard Chairman 11th District North Carolina Republican Party
70 Cheestoonaya 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, appearing to read "A.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
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 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.

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

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 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

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.

HAYWOOD COUNTY, C.S.C.

2018 APR 13 PM 1:06

FILED

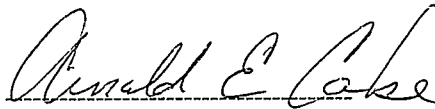
TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

Thomas Stark , Chief Legal Counsel North Carolina Republican Party:

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Submitted this 13 day of April.



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

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Raleigh, NC 27605

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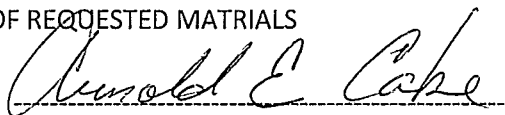
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Stark Law Group
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Chapel Hill, NC 27517

Aubrey Woodard Chairman 11th District North Carolina Republican Party
70 Cheestoonaya Court
Brevard, NC 28712

And Hand delivered to the Haywood County Clerk of Court.

TIME AND DATE FOR PRODUCTION OF REQUESTED MATERIALS

On this 13th Day April 2018

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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

FILED SERVICE NOTICE

STATE OF NORTH CAROLINA APR 10 PM 4:27

HAYWOOD COUNTY, C.S.C.

COUNTY OF HAYWOOD

BY RT

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

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE,

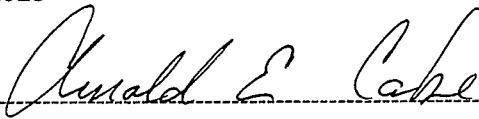
JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

WAIVER OF TRIAL BY JURY

On this 9th day of April, 2018, a copy of attached WAIVER OF TRIAL BY JURY 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.

WAIVER OF TRIAL BY JURY

On this 10th Day April 2018



A.E. CABE, PRO-SE

A.E.CABE

13 Haven Place

Canton, N.C.28716

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD 2018 APR 10 PM 4:27

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.

WAIVER OF TRIAL BY JURY

NOW COMES the Defendant A. E. Cabe herein and under the provisions of 38 (D) and 5 (d), N.C. Rules Of CIVIL PROCEDURE, KNOWINGLY WAIVES HIS CONSTITUTIONAL RIGHT to a trial by jury. Although This written waiver is not required, however, in order to facilitate an orderly disposal of the within case, the undersigned, desires to inform this Honorable Court of his desire for a Bench Trial for reasons outlined here:

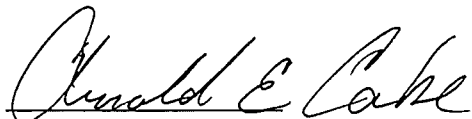
Plaintiff's case is predicated upon a "shrimp net" approach to multiple defendants, i.e. sweep up all associates of the HAYWOOD REPUBLICAN ALLIANCE or any of the other defendants, without regard to veracity of the allegations. Since it is doubtful if Plaintiff will dismiss any of the named defendants, even if she has no evidence against them; this trial is unlikely to be as orderly as desired AND, the severance of this Defendant is more likely to simplify all issues for all parties.

No request or acquiescence to Plaintiff's request for jury trial has been communicated or considered by this Petitioner.

In conclusion, the utilization of the 'shotgun' approach to 'bagging' any and all of one's opponents is, not only bad tactics but worse ethics, whether by design or ignorance.

WHEREFORE, DEFENDANT PRAYS for approval of this 'insurance' request informing all of my desires.

RESPECTFULLY SUBMITTED THIS 10th DAY OF APRIL, 2018.



A.E. CABE, PRO-SE

FILED

2018 APR 10 AM 9:20

SERVICE NOTICE

STATE OF NORTH CAROLINA

HAYWOOD COUNTY, C.S.C.

COUNTY OF HAYWOOD, RT

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

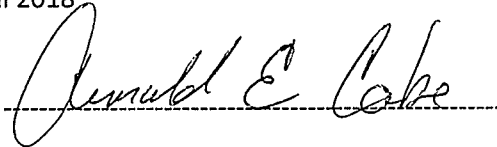
MOTION IN OPPOSITION TO PLAINTIFF;S REQUEST FOR A TIME EXTENSION TO
PREPARE ANSWERS TO DEFENDANT'S INTERROGATORIES & REQUEST FOR DOCUMENTS

On this 9th day of April, 2018, a copy of attached MOTION IN OPPOSITION TO PLAINTIFF;S REQUEST FOR A TIME EXTENSION TO PREPARE ANSWERS TO DEFENDANT'S INTERROGATORIES & 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.

MOTION IN OPPOSITION TO PLAINTIFF;S REQUEST FOR A TIME EXTENSION TO
PREPARE ANSWERS TO DEFENDANT'S INTERROGATORIES & REQUEST FOR DOCUMENTS

On this 10th Day April 2018



A.E. CABE, PRO-SE

A.E.CABE

13 Haven Place

Canton, N.C.28716

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

FILED

2018 APR 10 AM 9:20

HAYWOOD COUNTY, C.S.C.

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

BY _____

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL.

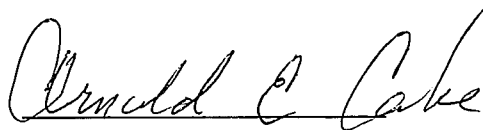
MOTION IN OPPOSITION TO PLAINTIFF'S REQUEST FOR A TIME EXTENSION TO PREPARE ANSWERS TO DEFENDANT'S INTERROGATORIES & REQUEST FOR DOCUMENTS

NOW COMES THE DEFENDENT HEREIN and submits his opposition to the Request for a time extension to answer interrogatories for the following reasons:

1. Plaintiff gives no reason for this delay in discovery; and
2. Plaintiff has little credibility for a number of reasons, namely, denying ALL of Defendant's requests for admissions when a number could be answered very easily with the truth; and
3. Counsel has, I believe, been out of his office for an extended period, not occupied with Plaintiff's business; and
4. All counsel should be dedicated to their client's business OVER their activities and NOT rely on their opponents to alter their schedules for the whims of opposing Counsel.

Wherefore Defendant Prays That The Request for an extension (delay) be denied; and That this Honorable Court grant Defendant such other and further relief as deemed appropriate.

Respectfully Submitted this 10th day of April, 2018.



A.E. CABE, PRO-SE

SERVICE NOTICE

FILED

2018 APR 10 AM 9:20

STATE OF NORTH CAROLINA

HAYWOOD COUNTY, C.S.C.

COUNTY OF HAYWOOD

BY AW 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

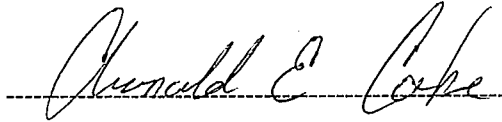
MOTION FOR ORDER FOR PSYCHIATRIC EXAMINATION

On this 9th day of April, 2018, a copy of attached MOTION FOR ORDER FOR PSYCHIATRIC EXAMINATION 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 ORDER FOR PSYCHIATRIC EXAMINATION

On this 10th Day April 2018



A.E. CABE, PRO-SE

A.E.CABE

13 Haven Place

Canton, N.C.28716

STATE OF NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE

COUNTY OF HAYWOOD

2018 APR 10 AM 9:20

SUPERIOR COURT DIVISION

HAYWOOD COUNTY, C.S.C.

CASE NO. 18CVS 116

RY _____

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E.CABE, ET. AL.

MOTION FOR ORDER FOR PSYCHIATRIC EXAMINATION

NOW COMES THE DEFENDANT CABE HEREIN, showing this Honorable Court the following:

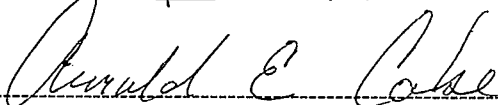
The Plaintiff has for some time exhibited bizarre behavior, indicative of one who might have a mental disease or disorder. In November 2016 on election night of the General Election Plaintiff told a number of persons at the festivities at HCGOP Hqs. Walnut Street, Waynesville, NC, that someone had telephoned her daughter (married to the Plastic Surgeon), and threatened her life. When pressed by the listeners as to further action, Mrs. King did not reply, Furthermore, there are items about in this county (unsubstantiated) about her consultations with Medical Personnel qualified in Psychiatric Studies as well as the usage of prescribed drugs.

Due to the absence of any personal observations of her actions to be submitted as evidence; the Defendant would acquiesce to receive from Plaintiff documentary proof since Jan 2015 of any visits to a Psychiatrist together with evidence of any drugs prescribed for mental issues, to include depression, bipolar, mendacity and persecution complex. In the event these items of possible evidence are not produced, then an Order North Carolina General Statutes Chapter 1A: Rules of Civil Procedure. Section 35(a) NCCCP will be again sought:

WHEREFORE DEFENDANT PRAYS THAT:

Plaintiff be ordered to produce all items stated herein within 10 days after receiving this request, AND Defendants have such other relief as deemed appropriate.

SUBMITTED THIS 10th DAY OF April, 2018.



A.E. CABE, DEFENDANT PRO-SE

FILED

SERVICE NOTICE
2018 APR -9 AM 10: 49

STATE OF NORTH CAROLINA

HAYWOOD CO., C.S.C.
BY RT

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

RESPONSE TO PLAINTIFF'S

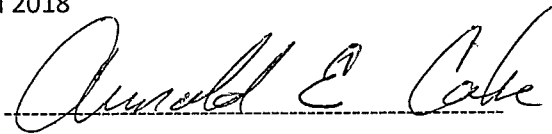
MEMORANDUM IN OPPOSITION

29 MARCH 2018

On this 9th day of April, 2018, a copy of attached RESPONSE TO PLAINTIFF'S MEMORANDUM IN OPPOSITION 29 MARCH 2018 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 deliyered to the Haywood County Clerk of Court.

RESPONSE TO PLAINTIFF'S MEMORANDUM IN OPPOSITION 29 MARCH 2018

On this 9th Day April 2018



A.E. CABE, PRO-SE

A.E.CABE

13 Haven Place

Canton, N.C.28716

FILED

STATE OF NORTH CAROLINA

2018 APR -9 AM 10: 49

IN THE GENERAL COURT OF JUSTICE

HAYWOOD COUNTY

HAYWOOD CO., C.S.C.
BY _____

SUPERIOR COURT DIVISION

CASE 18CVS116

DEBORAH KING,

PLAINTIFF

VS

DEFENDANTS

HAYWOOD REPUBLICAN ALLIANCE

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

RESPONSE TO PLAINTIFF'S

MEMORANDUM IN OPPOSITION

29 MARCH 2018

IT IS NOTED THAT PLAINTIFF'S COUNSEL omitted the undersigned herein from the multitude of Defendants named; was this a Fraudian slip?

ERRORS, OMISSIONS AND IRRELEVANT MATTERS

WHILE LEAFING THROUGH PLAINTIFF'S legal argument, it was noticed that a few errors were made in the quoting of authorities; in order to maintain an orderly approach with professionalism to our assigned tasks, it is necessary to point these out to Counsel for Plaintiff:

The case of Nguyen V Taylor is only de minimisly familiar to this one in which we're engaged AND That factor is not highlighted in any manner. In fact, the "appropriation" contained in both is only in the word.

1. A case that involves 40 Million \$ can hardly be mentioned in the same breath with one that offers at most, less than 13 of the infamous exhibits, prepared by whom? Moreover, any case that determines over \$10 million in punitive damages is proper is NOT on all fours with Ms. King's case; they use one word that is common...appropriation, which is used liberally in other cases not involving a violation of Privacy. In conclusion, to compare an acorn to a giant oak is ludicrous.

2. While Justice Calabria is certainly a learned and able deliverer or interpreter of North Carolina statutes, laws and authority, she was nor is involved in either of the cases Plaintiff quoted; Her name has no place in Plaintiff's Brief and one wonders if something was missed;

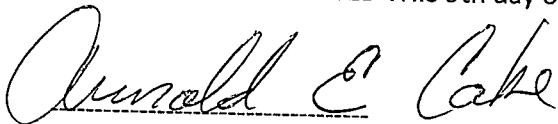
3. The second case mentioned has no connection or relationship to the issues of this trial; one wonders why it is in said Memorandum; perhaps to test my reading and retention skills? To take a 25 plus page case that goes into detail on subjects of libel, slander, defamation, "false" light: as well as the 4 types of Invasion of Privacy, propounded by Prosser, into a cited case for this case, admittedly presented as an appropriation, is pitiful. One reading the case would be unable to see any comparison to the Plaintiff's presentation.

Despite what Plaintiff alleges about the 'appropriation' the complaint is replete with assertions which can be construed as slander and libel, to perhaps confuse the opposition, the jury and perhaps the presiding Judge. To dazzle the opposition is acceptable but to deliberately confuse the other side as to the alleged wrong is close to a violation of Rule 3.3 in the Standards of Conduct for N.C. Attorneys. But maybe, the learned Counsel did not intend to do this; if so, a greatly Revised complaint is in order.

It is hopeful that the insertion, for whatever reason, of the N.C. Rules of Pattern of Jury Instructions, into the Memo of 29 March 2018 indicates an understanding of the laws to be applied to this effort AND the desire to obfuscate has declined.

It is interesting that the paragraph second from the end of said Memo contains not facts but the regurgitated rumors contained in the 'Complaint'. Repeating these is not instructional nor helpful if said Counsel sincerely desires to maintain amicable relations. I desire a redacted 'Memo' to reflect my observations of your case.

RESPECTFULLY SUBMITTED THIS 9th day of April, 2018.



A.E. Cabe PRO-SE