

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.

MOTION TO PERMIT COUNTERCLAIM AGAINST PLAINTIFF AND ATTORNEY MCLEAN

NOW comes the Defendant Haywood Republican Alliance (HRA), an Unincorporated Association, by and through its friends/members A. E. Cabe and Monroe A. Miller, Jr; Motioning this Court to permit this counterclaim, even though it is tardy. The reasoning for the delay is that this Defendant was not sure that the within Plaintiff/Attorney would continue their efforts to defame the defendant herein through this entire episode; The beginning of the Respondents herein's efforts to libel and slander the Defendant's reputation was: Involvement in a conspiracy that removed over 40 members of the Haywood County GOP including defendants, Sending false information to the NCGOP leaders and Lawyers to have No Trespass orders taken out on 4 Haywood Republican defendant's , spearheading the efforts to get 5 Haywood Republican defendant's charged with Party Disloyalty, followed by the fraudulent Complaint filed on 6 FEB 2018. However, it did not stop then but continued to date. Mr. McLean filed his motion for a Protective Order for Plaintiff, alleging a variety of improbable acts. As a result of the actions of both respondents, the recipients of this Counterclaim (NCGS 59B-8) have jointly and severally damaged the reputation of this political group, Haywood Republican Alliance, in favor of Plaintiff's group, Haywood County GOP/NCGOP. As it was in the beginning so is it still. The tendency in this jurisdiction is for the one swinging the axe of the Plaintiff to be the one in the right; when the publicity in the Smoky Mountain News, Waynesville Mountaineer, Blue Ridge Public Radio, Daily Haymaker, even the Charlotte Observer was published accompanied by said filing, the HRA was powerless to counteract this adverse publicity. It is true that the HRA did put up a spirited defense through the briefs of others; however, there is not one scintilla of evidence produced by Plaintiff/Counsel connecting the HRA group to any misconduct alleged. It was thought that the Plaintiff & Counsel would observe this fact and discharge the HRA from the suit. Not so, after one individual defendant, who committed no act, petitioned the Plaintiff for a dismissal against him without a

response; it was seen that any approach to the Two (Plaintiff and Counsel) would be futile. These are the reasons that this filing is late; a hope for sanity to Emerge, but it did not.

FILED

JUN -5 AM 9:06

HAYWOOD COUNTY, C.S.C.

Damages are primarily to the reputation of the Haywood Republican Alliance, if it cannot encourage others to affiliate, solely because of the printing of Smoky Mountain News, ex parte, of Plaintiff's biased remarks about the HRA; AND the wording of the complaint by McLean to defame this group. A reputation is very hard to value and its diminution by unwarranted remarks/publicity is likewise incapable of precise monetary Determination. There are roughly 20 or so members and perhaps another 10 or so attendees at times. This is not a plea for any individual and no portion of any awarded finances goes to any person. The Defendant herein seeks enough funds to continue to present its version of Conservative government To the public AND nothing else. In finality, to defame any organization/group in a rural county, is a sting not easily eased. We know from experiences that words can hurt and printed words can damage more; the HRA Prays for some amount of damages to be awarded, for the reasons outlined herein against Plaintiff Deborah King and her Attorney, Mr. McLean, both jointly and severally AND Defendant HRA be given such other considerations as deemed proper.

Respectfully Submitted this 5th day of June 2018

HAYWOOD REPUBLICAN ALLIANCE

BY Donald E. Cabe

A.E. CABE, PRO SE

HRA Member,

And

BY Monroe A. Miller, Jr.

Monroe A. Miller, Jr.

HRA Member

FILED

2006 JUN 5 AM 9:06
CLERK OF COURT, C.S.C.

§ 59B-8. Capacity to assert and defend; standing.

(a) A nonprofit association, in its name, may institute, defend, intervene, or participate in a judicial, administrative, or other governmental proceeding or in an arbitration, mediation, or any other form of alternative dispute resolution.

(b) A nonprofit association may assert a claim in its name on behalf of its members or persons referred to as "members" by the nonprofit association if one or more of them have standing to assert a claim in their own right, the interests the nonprofit association seeks to protect are germane to its purposes, and neither the claim asserted nor the relief requested requires the participation of a member or a person referred to as a "member" by the nonprofit association. (2006-226, s. 1.)

SERVICE NOTICE

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

FILED
2018 JUN -5 AM 9:05
HAYWOOD COUNTY, N.C.
IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT
Civil Case 18CVS 116

DEBORAH KING

VS

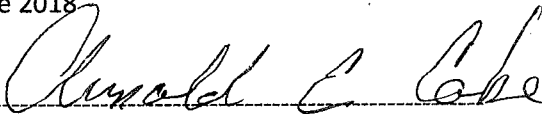
HAYWOOD REPUBLICAN ALLIANCE,

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

MOTION TO PERMIT COUNTERCLAIM AGAINST PLAINTIFF AND ATTORNEY MCLEAN
On this 5th day of June, 2018, a copy of attached MOTION TO PERMIT COUNTERCLAIM AGAINST
PLAINTIFF AND ATTORNEY MCLEAN 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 PERMIT COUNTERCLAIM AGAINST PLAINTIFF AND ATTORNEY MCLEAN

On this 5th Day of June 2018



A.E. Cabe PRO_SE

and



Monroe A. Miller, Jr
HRA Member

STATE OF NORTH CAROLINA
COUNTY OF HAYWOOD

FILED
2017 JUN -4 PM 12:24
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 TO COMPEL DISCOVERY

This case began on 2/6/2018 and was promptly answered with general denials. Shortly thereafter, about , this Defendant filed and served on the Plaintiff 33 interrogatories and approximately 12 requests for documents (D 1-2). Service was on March 2nd 1:09 PM some 92 days ago. No response from Plaintiff, or requests for clarification or Modification. Since that date, there has been no answer from Plaintiff's Attorney; Defendant Herein has filed at least two requests for action by this Court as well as 6-8 Defendant to Attorney Requests for responses to the 1st set of Interrogatories/ requests for documents. In fact within the Last 5 days of this Motion, Opponent's Attorney was again notified of his failure to assist in Discovery. Once more, no response from Plaintiff. The discovery items were generally inquisitive of any evidence of her mental status to include its Nature, origin, diagnosis along with her treating Physicians, time of treatments as well as medications Taken. Shortly thereafter, a Motion to order a Psychiatric Exam was filed with the Court; To my Recollection this has not been answered But was buttressed with two Affidavits. In the opinion of this Defendant, some of Plaintiff's obstinacy is due to her desire to protect any evidence of any nature about her mental status, and any involvement of the NCGOP to bring down the Haywood Republican alliance.

The neglect and refusal to comply with art. 37(a), NCRCP and other authorities has created for this Defendant great difficulties in preparing for a trial without ANY of the information needed to delve into the reasoning behind this trial, in fact, a minor proceeding considering the convoluted complaint of the Plaintiff. Not only these missing pieces of the entire web but the stress and worry on my wife and Myself about the vast sum of \$75000 being requested of myself. Not being in Court before, I have no idea or conception of the possibility of being burdened with a large judgment. When a supposedly experienced Attorney acts and reacts in such a bizarre manner, causing myself and other Defendants serious trial difficulties and a Trial Judge is not present (not his fault) to moderate the issues; chaos

develops promptly and leaves a Pro Se Defendant without any protection or guidance from the Court. hp
audio switch Even if he (McLean) complies within a reasonable time, his actions have or will stretch out
the time of the Trial a substantial bit.

WHEREFORE DEFENDANT PRAYS THAT PLAINTIFF AND HER ATTORNEY BE:

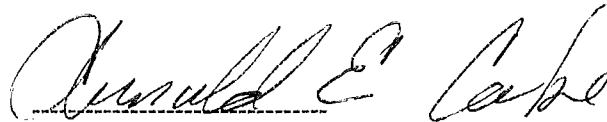
ORDERED by the Court to deliver to the Defendant no later than _____ answers to Defendant's

First submission of Interrogatories/ requests for Documents AND:

Expenses of _____ as well as Attorney's Fees _____ are granted Defendant AGAINST

Plaintiff and Mr. Russell McClean, Plaintiff's Attorney

Respectfully Submitted this 4th day of June, 2018.

A handwritten signature in cursive script, appearing to read "A.E. Cabe", written over a horizontal dashed line.

A.E. CABE, PRO SE

SERVICE NOTICE

FILED

STATE OF NORTH CAROLINA

2018 JUN -4 PM 12:24

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,

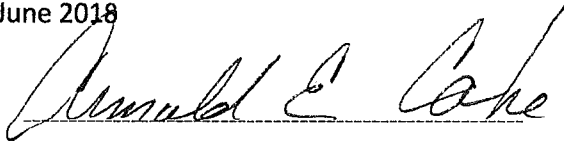
JEREMY DAVIS, RICHARD WEST, A.E.CABE, ET. AL

MOTION TO COMPEL DISCOVERY

On this 4th day of June, 2018, a copy of attached MOTION TO COMPEL DISCOVERY 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 COMPEL DISCOVERY

On this 4th Day of June 2018



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

AMENDMENT TO MOTION TO DENY PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

NOW COMES Defendant Cabe and Moves This Court to admit this Amendment to Defendant's Motion To Deny Plaintiff's Motion For an Injunction: Buttressing the facts and law submitted earlier as stated herein, Defendant shows that a Preliminary Injunction is a summary matter not to be taken lightly; that there are basically three requirements for the Proponent to meet before such action is approved: 1.A likelihood of success on the merits;2.Irreparable harm must be shown ; AND 3.A showing of danger to Movant's rights in the interim to the trial.(NAPCO V PBM GRAPHICS,NCBC,09CV157,2009; GLOBAL V TDI,LLC et al,2017 NCBC106).

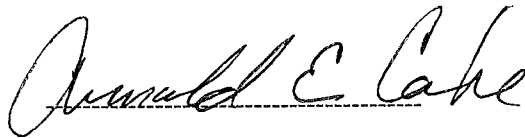
Plaintiff has failed to show any evidence that any of the three requirements are met; as to the likelihood of success, a pleading/complaint dealing in generalities, with a group, no individuals named, responsible for some faintly described act. Is vague, not reaching the status required for an Order of Preliminary Injunction (Wilson V NC Dept Commerce Nc Apps....(2015). The 2d requirement for a Preliminary Injunction requires an affirmative showing by the Plaintiff of irreparable harm to the plaintiff SHOULD said Injunction Not be granted; again, there is no showing of such potential harm or, in fact, any harm to Plaintiff, who has failed to show this Court the specifics of the alleged harm, its type, its source as well as its affect on the Plaintiff. Since this case is now some 101 days old, without any threat from this Defendant, the claim of 'irreparable harm' is without merit. The question is where is the threat and from whom? The plaintiff sued some 28 persons; 3 by name; 25 as unnamed members of the Haywood Republican Alliance and 6 Alias Defendants. Which of these is the likely offender? The bringing of an action without a definite suspect is not permitted in the laws of this state unless unusual circumstance exist, i.e. Act of God, accident without a negligent party, etc.

The third requirement is a clear danger to the Movant's rights until the trial. No showing by the Plaintiff whatsoever of ANY violations of her rights of any type at any time. Another generality of An accusation without an offender and without any specific details on the type of intrusion into her life or anything at all to show that any offense is likely to occur (VISONAIR V JAMES,167 NCAPPS 504, 2004) AGAIN, the 101 days and counting, counteract any claim by the Plaintiff that any threat exists to the Safety and solitude of her person. It appears unlikely that Plaintiff will be able to procure a bond for some 28 persons plus the Alias 6, assuming their identities are revealed and they are served with the complaint. The highest number of persons requiring a bond is, therefore, could reach the number of 34. Plaintiff must make a clear financial showing of ability to procure said bond; but she has not. Injunction will not be granted where there is an adequate legal remedy available to the Court, (GLOBAL V TDI WORLDWIDE,LLC, supra).

WHEREAS DEFENDANT CABE PRAYS THAT THIS COURT PERMIT THIS AMENDMENT TO HIS PRIOR MOTION BE ACCEPTED AND THAT;

Plaintiff's motion for injunction be denied AND Defendant be granted such other relief as deemed appropriate.

RESPECTFULLY SUBMITTED THIS 4th DAY OF June 2018

A handwritten signature in cursive script that reads "Arnold E Cabe". The signature is written over a horizontal dashed line.

A.E. CABE, PRO SE

SERVICE NOTICE

STATE OF NORTH CAROLINA

2018 JUN 14 PM 2:05
CLERK OF COURT

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

AMENDMENT TO MOTION TO DENY PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

On this 14th day of JUNE, 2018, a copy of attached AMENDMENT TO MOTION TO DENY PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

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 MOTION TO DENY PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

On this 14th Day of JUNE, 2018

A. E. Cabe

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.

MOTION TO APPLY DE MINIMIS NON CURAT LEX

This Latin phrase means to us,; 'trivial, not worth the effort.' This concept of dismissing or reducing minute, very small presentations of amounts, usually of figures or money. It is not new, having been on American Jurisprudence for several hundred years. What was its purpose? Simply to save resources, both time and effort , by avoiding hair-splitting, divisive concepts; many other cases or disagreements are in the pipeline, necessitating better and more effective processing. In a frank analysis, this alleged evidence is really not evidence. Does this mean that it has NO eviditiary substance at all. NO, but neither Party will benefit if it is given more value than merited. The Court does examine the effects on the Parties.

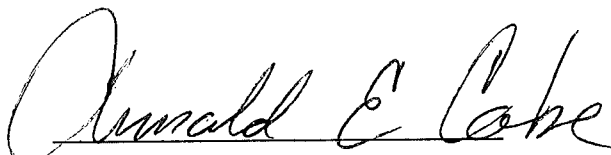
A fee that he had to reimburse an insurance company for a .60c fee paid to the ins. Co. for coverage on The Plaintiff's loan. A Class Action, the Court found out that any judgment would only pay each out About \$1.00. The Court dismissed the case, ,Wilson V Nat.Finance Co, 243 SE 2d 145, 1978 Wright V N.C. 2015, a voting rights case from Wake County where a number of groups sued the Wake Co. Bd of Education and the State of N.Carolina, whereby the 2010 Division of Wake County Education Board seats was under attack for deviations in numbers within districts. The US Supreme Court held That the standard applied was a five % maximum of difference between the 7 districts. The NC Numbers used were all less than the maximum permitted . The Sup.Ct. held that 'the deminimis Concept applied to this factual situation, affirming the US District Ct. Ruling,See STATE V PRINCE, 183 NC 798(1921), CRENSHAW V PRITSOAD, 144 NC 320).

THE case of WARREN V KELLER, USDC, WESTERN CAROLINIA (2012) a life sentenced prisoner tried figuring his 'good time' into the equation to determine that he should be released. He had made a number or errors And his sentence was not nearly completed. The Court held that since the issue was not even close, they would end it with a dismissal for De Minimis reasons.

In the present case, examining any possible scenario it is: that the HRA, unknown culprit, made ,at most 12 of the noteworthy buttons(actually made by Jib-Jab, on site internet); of this 12 only 3 were selected at some outdoor event in Haywood during the summer of 2017. There was no sale; the selector could donate to the HRA, by virtue of the 'donation' jar in one of Plaintiff's exhibits. No one can recall the precise amount received in the jar as there was money already in the jar. At the most, an estimate is \$9.00. This case is unlike any in N.C. or the entire U.S. Besides being a fraud on the Court and costing Some thousands of Dollars, its motives are solely political driven by hatred and revenge. Dismissal of This case is in the best interests of all Parties and the Court.

WHEREFORE DEFENDANT PRAYS THAT THIS Honorable COURT INQUIRE INTO THIS MOTION, AND; Dismiss this Suit For The reasons Stated Herein AND; Award Defendant Attorney's Fees, Expenses of Litigation And Such Damages as Permitted by Law.

RESPECTFULLY SUBMITTED THIS 4th DAY OF JUNE, 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,

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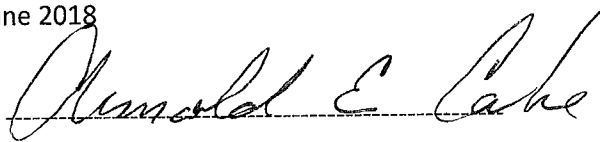
MOTION TO APPLY DE MINIMIS NON CURAT LEX

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And Hand delivered to the Haywood County Clerk of Court.

MOTION TO APPLY DE MINIMIS NON CURAT LEX

On this 4th Day of June 2018



A.E. Cabe PRO_SE

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

DEBORAH KING

VS

HAYWOOD REPUBLICAN ALLIANCE

JEREMY DAVIS, RICHARD WEST,

A.E. CABE, ET. AL

IN THE GENERAL COURT OF JUSTICE

SUPERIOR COURT DIVISION

CASE NO. 18CVS 116

MOTION TO DISMISS UP NCGS 41(B), NCRCP RULES 37 and 11

NOW COMES DEFENDANT CABE AND MOVES THIS HONORABLE COURT TO DISMISS PLAINTIFF'S COMPLAINT under the cited authorities; offering the following in support of said Motion: Plaintiff's Counsel has interfered with the discovery process by refusing to comply with Defendant's Requests to Answer Interrogatories, served on 10 March 2018, along with a request for documents. He has refused to communicate with Defendant but has been contacted by mail, requesting the Plaintiff's compliance. In early Counsel requested of the Asst. Clerk of Court a 30 day extension as he was too busy. Said Counsel had just returned from a hunting trip to South America. Plaintiff has NEVER requested any discovery from Defendant in this case. Furthermore, quite a few Motions have been filed against, perhaps as many as 20, without any answers from Opposing Counsel. These Motions are important to move this case forward and, Defendant is unable to finalize his Defense without the requested materials. One particular Motion to Require the Plaintiff to Submit to a Psychiatric Exam is largely dependent upon the information/documents requested by the Defendant on 10 March 2018. Opposing Counsel is wasting the time and assets of Defendant by his Continuing obstinate attitude towards discovery.

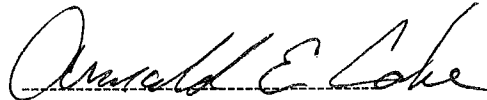
Counsel is guilty of violations of Article 11 as cited herein, by signing a complaint, alleging that he had Investigated/inquired into Plaintiff's Complaints, finding them meritoriously accurate, as well as the same violations about -10 May 2018, when he filed a Motion for Protective Order, giving no evidence of any facts supporting his Motion AND, claiming bizarre and highly unusual actions occurring without any culprit named. One was his assertion that an unnamed Appellate Judge in NC was sent matters pertaining to this case AND that someone, unnamed was tainting the jury pool by similar airings of pleadings, filings, etc. The question is : how does a Court address such allegations against none? This is suspicious, and unproven, and another attempt to delay this case;

UNDER Rule 41(b) the Counsel is refusing to move the case forward by taking advantage of the absence of a Sitting Judge from this county, assigned to this case. While this trial is pending, said Counsel sued his

wife or ex-wife, in Haywood District Court, over a joint Personal Computer, thereby depleting his time and energy, affecting his ability to properly discharge his responsibilities to the Plaintiff (see McClean V Kosir, 18 CVD 345, Haywood District Court; ~~attached~~).

Of all the Motions filed by the Defense, all requiring an answer; Opposing Counsel has failed to answer Even One; the 30 day period having run on several. It is impossible to try a case AGAINST one who deliberately attempts to circumvent the process, Especially when the assigned Judge is unavailable.

RESPECTFULLY SUBMITTED THIS 4th 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 the typed name.

A. E. CABE, PRO SE

SERVICE NOTICE

STATE OF NORTH CAROLINA

2018 JUN -6 PM 1:13
HAYWOOD COUNTY, N.C.

COUNTY OF HAYWOOD

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

DEBORAH KING

VS

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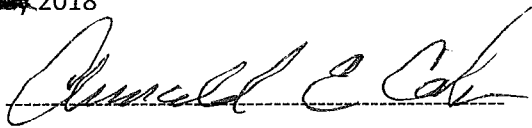
MOTION TO DISMISS UP NCGS 41(B), NCRCP RULES 37 and 11

On this 4th day of ~~MAY~~ JUNE, 2018, a copy of attached MOTION TO DISMISS UP NCGS 41(B), NCRCP RULES 37 and 11 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 DISMISS UP NCGS 41(B), NCRCP RULES 37 and 11

On this 4th Day of ~~MAY~~ JUNE 2018



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

AMENDMENT TO DEFENDANT'S COUNTERCLAIM AGAINST PLAINTIFF

NOW COMES Defendant Cabe and seeks permission of this Honorable Court to amend his Prior Counterclaim Against Plaintiff for the following reasons:

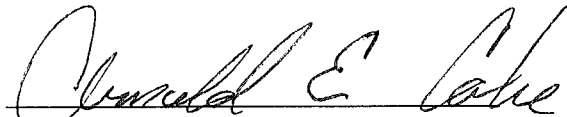
The Plaintiff's case has been injured by the continued blocking and delaying tactics of Plaintiff's Counsel in that he has not attempted to comply with Defendant's presentation Of 33 interrogatories and requests for documents critical to Defendant's defense to allegations of Plaintiff's Complaint. A number of requests and interest have reached Plaintiff's Counsel, fully alerting him to the seriousness of his failure to provide the discovery requested of the Plaintiff. Instead of trying to cooperate in order to expedite the trial, he files a Motion for A Protective Order alleging matters such as : sending matters on the pre-trial activities to an Appellate Judge, NCCAppeals AND putting public documents on Facebook. Additionally, he, in his Motion alleges some possible harm to his Client (unstated or unclear) by the actions described. He attacks the interrogatories and request for documents (Def.1) as being searches for privileged or unpermitted information. This, as he violated the provisions of Rule 33, NCRCProcedure, consistently since May 9, 2018. He obtained a 30 day extension on April 9, 2018, while concealing his personal trip to South America from the Asst. Clerk of Court, during late Mar-Early April. His attitude and actions have cost this Defendant in time and money and, moreover, have greatly hampered his defense to Plaintiff's charges. He has taken advantage of NO Judge being assigned to this case until the week of 7 May 2018. Without a Judge to control his activities, Counsel demonstrated his disdain for the regulations of the Law. He has violated the precepts of Rule 11 (1)(2)(3) NCRC Procedure by omitting the law, twisting any alleged facts and doing these for an improper purpose. Said Counsel is dedicated to being an obstacle to any efforts to retrieve valuable information about Plaintiff's mental status through the discovery mechanisms heretofore stated. Counsel knows that the information sought by this

Defendant proves the requested Motion for A Psychiatric Exam is meritorious. This exam will destroy her credibility, revealing her real reason for this lawsuit....Political revenge on the Movant herein; the money sought is just icing on the cake. Counsel desires to prohibit this Defendant from receiving information buttressing his defense from the discovery so long delayed.

Counsel is unsympathetic to the liability of his Client for his commissions and omissions in His unwise efforts to defy this Court, the Rules of Professionalism, as well as Rules 33 and 11 NCRCPcedure, have placed his Client in a hazardous position facing sanctions as well as two Counterclaims against Plaintiff. It is the opinion of the Movant herein that the entire scheme is built around a HOPE for a mistrial. No Party in this Trial has met with the Presiding Judge nor had any opportunity for anyone to monitor Counsel's conduct. Plaintiff's actions have caused this Defendant to spend money filing Motions in efforts to motivate opposing Counsel to comply with statutes, regulations, and Bar Rules in his representation. Besides the expenditures, Movant has devoted hours and hours of research time, seeking guidance on a solution to the "nondelivery" problem. Movant has suffered stress beyond belief just because of Counsel's and his client's disregard of discovery rules and any concern for others.

WHEREFORE, Defendant Prays that the empaneled Jury renders a verdict of \$Ten Thousand (\$10000) Dollars for the reasons outlined herein ; AND such further relief as deemed proper.

Respectfully Submitted, this 4th day of JUNE, 2018



A. E. Cabe PRO-SE

SERVICE NOTICE

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COUNTY OF HAYWOOD

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SUPERIOR COURT
Civil Case 18CVS 116

DEBORAH KING

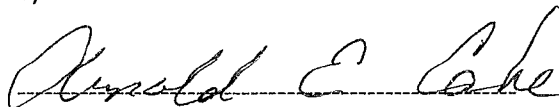
VS

HAYWOOD REPUBLICAN ALLIANCE,

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AMENDMENT TO DEFENDANT'S COUNTERCLAIM AGAINST PLAINTIFF
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And Hand delivered to the Haywood County Clerk of Court.

AMENDMENT TO DEFENDANT'S COUNTERCLAIM AGAINST PLAINTIFF
On this 4th Day of JUNE 2018



A.E. Cabe PRO_SE

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

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DEBORAH KING

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A.E. CABE, ET. AL.

DEFENDANT CABE'S OBJECTION TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER,
MOTION TO MAKE MORE DEFINITE AND MOTION TO DISMISS

NOW COMES Defendant Cabe and Moves this Honorable Court to dismiss each and every claim, allegation, and slanderous remark stated by the Plaintiff in her Six plus paragraphs plus the lengthy Prayer also filled with misstatements and strange requests for court costs and Attorney's Fees; AND Require Plaintiff to identify each and every imaginary defendant, listed as 'others' or some term other than a name; AND Plaintiff's diatribe in Para 6 contains an unlikely "will be" when casting around for verbiage. Moreover, this para has no defendant or possibility of one listed.

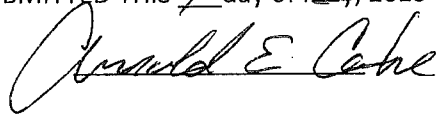
Further, Defendant Cabe denies each and every allegation contained in paragraphs 2,3 and 5.

Defendant has no knowledge of any allegations in para 6.

That Plaintiff make her pleading more definite by insuring that each interrogatory and request for documents has a specific, definite objection listed for each one; and that NC authority be given for each of Plaintiffs' generic objections.

WHEREFORE, DEFENDANT PRAYS FOR THE DISMISSAL OF PLAINTIFF'S MOTION for the reasons stated and, if not, then his objections be accepted AND a more Definite Statement be required of Plaintiff.

RESPECTFULLY SUBMITTED THIS ^{4th} day of ^{JUNE} ~~18~~, 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

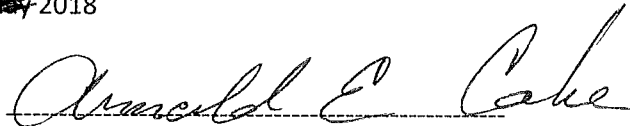
DEFENDANT CABE'S OBJECTION TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER,
MOTION TO MAKE MORE DEFINITE AND MOTION TO DISMISS

On this 4th day of ~~MAY~~ ^{JUNE}, 2018, a copy of attached DEFENDANT CABE'S OBJECTION TO PLAINTIFF'S
MOTION FOR PROTECTIVE ORDER, MOTION TO MAKE MORE DEFINITE AND MOTION TO DISMISS 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 CABE'S OBJECTION TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER,

MOTION TO MAKE MORE DEFINITE AND MOTION TO DISMISS
On this 4th Day of ~~MAY~~ ^{JUNE} 2018



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.

MOTION FOR SEPARATE FINDINGS OF FACT, INJUNCTION HEARING

NOW comes the Defendant Cabe and submits this request for a separate written findings of fact in any scheduled hearing on any Injunction proposed by the Plaintiff on me.

Submitted this 4th JUNE of ~~2018~~ 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

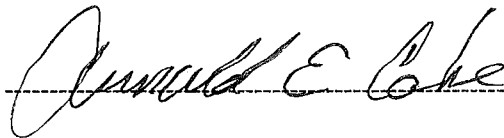
MOTION FOR SEPARATE FINDINGS OF FACT, INJUNCTION HEARING

On this 4th day of June, 2018, a copy of attached MOTION FOR SEPARATE FINDINGS OF FACT, INJUNCTION HEARING 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 SEPARATE FINDINGS OF FACT, INJUNCTION HEARING

On this 4th Day of June 2018

A handwritten signature in black ink, appearing to read "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.

MOTION FOR SANCTIONS

NOW COMES the Defendant A.E.Cabe, and shows this Honorable Court that Plaintiff and her Counsel, jointly, are in violation of Article 11, NVR Civil Procedure, and false Swearing for the Plaintiff in that both, in coordination and for purposes of deception, entered numerous matters of untruth in her complaint. Moreover, each or both alleged, under oath for her, and a violation of Article 11 for him, that the Defendant herein, was guilty of the offense of Appropriation, a form of invasion of privacy, when they knew or should that he had nothing to do with the alleged misconduct. It is true that little if any investigation was done by Counsel; he took his cue from the Plaintiff and; lumped a group of Republicans together with untrue and vicious epithets. He and the Plaintiff initiated this charade solely for revenge (for her) based on her coverage for her comrades in the HCGOP, most of whom are arch-enemies of this Defendant. Her other motive AND his, is to extract money from those who don't have it.

The complaint is replete with "these, those, the other" without designating the selected one responsible for the alleged acts. To embark on some unknown and unproven incident of some unknown and innocent party, in direct violation, of NC Statute 11 as well as permitting a client to swear to untruths, is reprehensible and degrading.

WHEREFORE, Defendant Prays that this Court inquire into these matters and render Justice to the aggrieved Parties.

Respectfully submitted this 4th day of June 2018

A. E. Cabe

A. E. Cabe PRO_SE

SERVICE NOTICE

STATE OF NORTH CAROLINA

Haywood County
Superior Court

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

MOTION FOR SANCTIONS

On this 4th day of June, 2018, a copy of attached MOTION FOR SANCTIONS 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

On this 4th Day of June 2018



A.E. Cabe PRO_SE

NORTH CAROLINA
HAYWOOD COUNTY

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

DEBORAH KING,

Plaintiff,

vs.

HAYWOOD REPUBLICAN
ALLIANCE, a Non-Incorporated
Political Action Committee by and
through, RICHARD OWEN WEST,
Individually and as Treasurer of the
HAYWOOD REPUBLICAN
ALLIANCE, JEREMY DAVIS,
Individually and as Member of the
HAYWOOD REPUBLICAN
ALLIANCE, and EDDIE CABE,
Individually and as Member of the
HAYWOOD REPUBLICAN
ALLIANCE, and JOHN DOE 1
THROUGH 6,

Defendants.

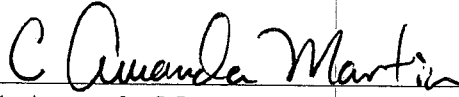
NOTICE OF HEARING

FILED
MAY 09 11:11:28
HAYWOOD COUNTY, NC

PLEASE TAKE NOTICE that Defendants Richard Owen West and Jeremy Davis will bring on for hearing their Motion to Dismiss at the June 11, 2018 session of the Civil Superior Court for Haywood County, North Carolina, in Courtroom 3A, Haywood County Justice Center, 285 N. Main Street, Waynesville, NC 28786. This motion shall be heard at 10:00 a.m. or as soon thereafter as the Court may reach this matter.

This the 8th day of May, 2018

STEVENS MARTIN VAUGHN & TADYCH, LLP



C. Amanda Martin
N.C. Bar No. 21186
Attorneys for Defendants
1101 Haynes St., Suite 100
Raleigh, North Carolina 27604
Telephone: (919) 582-2300
Facsimile: (866) 593-7695

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing by depositing a copy with the United States Postal Service, first-class postage prepaid, addressed to:

Russell L. McLéan, III
P.O. Box 4
Waynesville, NC 28786

Arnold E. Cabe
13 Haven Place
Canton, NC 28716

Haywood Republican Alliance
Richard Owen West
377 Walnut Street
Waynesville, NC 28786

This the 8th day of May, 2018.



C. Amanda Martin