

CASE NO. 13LF-CV00461

William M. Windsor	§	IN THE CIRCUIT COURT
	§	
Plaintiff,	§	
	§	
v.	§	
	§	15th JUDICIAL CIRCUIT
Allie Loraine Yager Overstreet,	§	
Mark Supanich, Brenda Williamson	§	
And John Does 1-1000,	§	
	§	
Defendants	§	LAFAYETTE COUNTY, MISSOURI

AMENDED MOTION TO STRIKE PLEADINGS AND FILINGS

BY DEFENDANT ALLIE L. OVERSTREET

Comes Now, William M. Windsor (“Windsor” or “Plaintiff”) and files this AMENDED MOTION TO STRIKE PLEADINGS AND FILINGS BY DEFENDANT ALLIE LORAIN YAGER OVERSTREET. PLAINTIFF shows the Court as follows:

ATTORNEY DID NOT FILE AN ENTRY OF APPEARANCE

1. On May 30, 2013, an attorney purportedly acting for DEFENDANT ALLIE LORAIN YAGER OVERSTREET (“DEFENDANT”) filed a MOTION

TO STRIKE PLEADINGS and a MOTION TO DISMISS AND
INCORPORATED SUGGESTIONS IN SUPPORT.

2. On June 3, 2013, an attorney purportedly acting for DEFENDANT ALLIE LORAIN YAGER OVERSTREET ("DEFENDANT") filed Certificates of Service of Discovery Responses.

3. Local Rule 21.2 requires that attorneys file an Entry of Appearance. No such Entry of Appearance has been served on the PLAINTIFF, and no such Entry of Appearance is shown on the Court Docket.

4. Pursuant to Local Rule 21.2, PLAINTIFF asks that all filings purportedly on behalf of DEFENDANT ALLIE LORAIN YAGER OVERSTREET by Matthew J. O'Connor or the O'Connor Law Firm be stricken due to the fact that Matthew J. O'Connor and the O'Connor Law Firm failed to file an appearance and cannot be recognized by this Court.

DEFENDANT FAILED TO ANSWER THE VERIFIED COMPLAINT

5. The VERIFIED COMPLAINT was filed on April 29, 2013.

6. On May 29, 2013, 2013, an attorney purportedly acting for DEFENDANT ALLIE LORAIN YAGER OVERSTREET ("DEFENDANT") filed what is titled as an ANSWER TO THE VERIFIED COMPLAINT.

7. The so-called ANSWER TO THE VERIFIED COMPLAINT was neither filed by DEFENDANT ALLIE LORAIN YAGER OVERSTREET nor an attorney who had filed an Entry of Appearance to represent her. PLAINTIFF was never served with an Entry of Appearance, and the attorney who filed the so-called ANSWER did not respond to emails from the PLAINTIFF regarding discovery and other matters.

THE IMPROPERLY FILED ANSWER IS DISHONEST

8. The so-called ANSWER could best be described as a despicable effort to circumvent the rules of civil procedure, defraud the Court, and deny justice to the PLAINTIFF. The PLAINTIFF filed a VERIFIED COMPLAINT in which he swore that everything stated in the VERIFIED COMPLAINT was true and correct and based upon his personal knowledge. It was signed under oath before a notary. 26 exhibits were attached, many of which the PLAINTIFF knows the DEFENDANT was familiar with.

9. Yet, the so-called ANSWER to paragraphs 11, 12, 14-34, 38-57, 60, 63-72, 74, 76, 77, 79, 82, 84, 87-201, in the VERIFIED COMPLAINT was: "Defendant states she is without sufficient knowledge or information to form a belief as to the truth of the allegations...."

10. This dishonest so-called ANSWER includes facts sworn to by the PLAINTIFF for which the DEFENDANT definitely had knowledge and information, such as:

- a. 60. After Meet Me in DC, Overstreet seemed to become obsessed with <http://Joeyisalittlekid.blogspot.com>, a site directed at the Plaintiff that the Plaintiff considers to be a hate site. Overstreet kept sending Facebook messages and emails about it to the Plaintiff. While Overstreet was regularly sending the Plaintiff postings by haters, she wanted the Plaintiff to stop mentioning them
- b. 115. Upon information and belief, Overstreet sent the death notice message to the Plaintiff or conspired with someone to send it.
- c. 119. At approximately 3:00 am on February 23, 2013, a posting appeared on the Lawless America Facebook page from the account of Overstreet. [A true and correct copy of this message reviewed by the Plaintiff is attached as Exhibit 521.]
- d. 141. Overstreet responded with a message that was false. [A true and correct copy of this message received by the Plaintiff is attached as Exhibit 509.]

e. 143. Overstreet continued to post false messages about the Plaintiff on Facebook.

f. 144. Overstreet lied numerous times in Facebook postings.

g. 145. At approximately 5:00 pm on Saturday, September 23, 2013,

Overstreet posted this on the Lawless America Facebook page:

“That's it? This is your big public ousting? A simple trace on the computer that sent that suicide message, would clear things up.

Although I doubt that gets posted. Unblocking me so I can watch the

train wreck, yet blocking me from commenting to defend myself is a

bit juvenile I think. Tell them, Bill, of the donations receipts. Tell

them of the movie and Sundance fiasco. Tell them of the thousands of

emails you copied me on. Tell them of the one where you are calling

them stupid. Tell them of Homeland Security list Bill, and the filming

at the capitol. Tell them how Stacey did send your hard drives back

and how you gave permission to use the banner and camera. Tell

Dottic what you really think of her. Tell them about Montana and the

cops chasing you out of the state. Tell them how many social security

numbers you have. Tell them about your database Bill. Tell them

about the emails you DONT publish. Tell them about the tv show Bill.

Tell them of your bad guy list and why they are on it . Tell them how many times you were in your basement when you you said you were on the road. Tell them about the death threats, or rather, the lack there of. Tell them about the trademark and copywrites Bill. Tell them how you sent me every email you ever sent any of them. Tell them about the meetings with movie agents. Go ahead, tell them. Tell them about your precious spreadsheets with all their personal info Bill. And while you are at it, tell them how to track IP's and proxy's, and how you never should have trusted a woman with brains enough to keep everything you ever said. ...You have made a grave mistake jerking innocent people around for your own midlife crisis. Haters aren't causing you to fail, YOU are causing you to fail. Lying about stupid shit trying to ruin peoples name, just because they dared to not bow correctly to you. Go ahead, trace the computer. I dare you. Tell them where all these criminal charges you have filed are. Tell them that you knew two weeks before DC we couldnt film in the capitol and that no legislators were coming. Tell them about the two under cover FBI agents in the Senate theater Bill. Tell them how you changed from a regular room to the biggest suite the Crowne had. Tell them how you

told me there wont be any movement and you are going to back out.
Tell them the timing in which this suicide message appeared.
Neh.....you won't do that, now will ya. Tell them how many letters
you have written to congress Bill. Tell them who actually wrote them .
Tell them who does all your work for you. Tell them why your son
won't associate his company with Lawless. Tell them how you didn't
remember Noah until I told you who he was. Tell them who got Stop
the Silence to endorse you. Who got Washington Families United to
endorse you. Who got you conference calls with media. Tell them
how you forgoynt to copywrite Lawless and asked me what to do.
Tell them how you have tens of thousands of unanswered emails. Tell
them who did what Bill. I do dare you to sue me and file charges on
me. I cannot wait. I will expose the real corruption within Lawless
America gladly, and not on faacebook to a bunch of people who
believe in you. I hope you do go to the cops, but I know you won't
because they already know you well. You are the sick one, for not
giving a shit about these peoples stories unless it is good PR for you.
You are good at talking sweet but suck at covering your tracks. Bring
it on Mr. Windsor, we will see where that suicide message came from

and we will blow you wide open for all your lies and using these folks vulnerabilities to your advantage. I am not your average lemming and lying about me to publicly and maliciously discredit my name was a big mistake.” [A true and correct copy of this message is attached as Exhibit 531.]

- h. 191. When you compare several of Overstreet's Posts, it seems to show that her strategy with this death notice scam is to claim that the Plaintiff posted knowingly false information.
- i. 192. Overstreet has posted a harassing, libelous, slanderous Facebook post in which she says Windsor is a liar and “make[s] shit up.”
- j. 195. Overstreet has posted a harassing, libelous, slanderous Facebook post in which she says the Plaintiff duped people.
- k. 197. Overstreet has posted a harassing, damaging Facebook posting in which she encouraged people to leave Lawless America.

11. These, and other paragraphs in the VERIFIED COMPLAINT, are all matters that DEFENDANT ALLIE LORAIN YAGER OVERSTREET has sufficient knowledge and information to answer.

12. DEFENDANT ALLIE LORAIN YAGER OVERSTREET denied eight of the 195 paragraphs in the VERIFIED COMPLAINT that the PLAINTIFF swore were true and correct based upon his personal knowledge.

DEFENDANT FAILED TO RESPOND TO INTERROGATORIES

13. On May 7, 2013, PLAINTIFF served PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT ALLIE LORAIN YAGER OVERSTREET. On May 7, 2013, PLAINTIFF sent the Certificate of Service to the Clerk of the Court for filing.

14. On June 3, 2013, the PLAINTIFF received what is purported to be "ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT ALLIE LORAIN YAGER OVERSTREET." But these so-called "ANSWERS" were not filed by the DEFENDANT nor were they filed by an attorney with an Entry of Appearance on file with the Court. Therefore, there is no response to the PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT ALLIE LORAIN YAGER OVERSTREET.

15. Furthermore, even if these so-called "ANSWERS" were considered to be properly filed, there are no answers. DEFENDANT ALLIE LORAIN YAGER OVERSTREET did not answer a single interrogatory.

16. The attorney who filed the so-called ANSWERS has ignored the PLAINTIFF'S emails about the discovery problems.

17. The PLAINTIFF has filed a MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND MOTION FOR SANCTIONS AGAINST DEFENDANT ALLIE LORAIN YAGER OVERSTREET, referenced and incorporated herein as if attached hereto.

18. Pursuant to Rule 61.01, PLAINTIFF asks that the pleadings of DEFENDANT ALLIE LORAIN YAGER OVERSTREET be stricken due to a failure to respond to interrogatories.

DEFENDANT FAILED TO RESPOND TO DOCUMENT REQUESTS

19. Pursuant to Rule 61.01, PLAINTIFF asks that the pleadings of DEFENDANT ALLIE LORAIN YAGER OVERSTREET be stricken due to a failure to respond to requests for production of documents.

20. The PLAINTIFF has filed a MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND MOTION FOR SANCTIONS AGAINST DEFENDANT ALLIE LORAIN YAGER OVERSTREET, referenced and incorporated herein as if attached hereto.

21. WHEREFORE, PLAINTIFF prays that this Court enter an order granting this MOTION TO STRIKE PLEADINGS AND FILINGS BY

DEFENDANT ALLIE LORAIN YAGER OVERSTREET; and grant such other relief as the Court deems appropriate.

Submitted this 7th day of July, 2013,

A handwritten signature in black ink, appearing to read "William M. Windsor". The signature is written in a cursive, flowing style.

William M. Windsor
514 America's Way #4841
Box Elder, SD 57719-7600
Email: nobodies@att.net
Phone: 770-578-1094
Fax: 770-234-4106

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	§	
Defendants	§	LAFAYETTE COUNTY, MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing by delivering a copy

by email to:

Allie Loraine Yager Overstreet – 1208 N Main, Higginsville, Missouri
64037 – loverstreet@yahoo.com and mjoc@workingforjustice.com
Brenda Williamson -- 210 Chestnut Apartment A, Belton, MO 64012 --
brendaawilliamson@gmail.com
Mark Supanich -- 1826 Lucky Strike Road, Helena, Montana 59602 --
markamw@yahoo.com

Submitted this 7th day of July, 2013,



William M. Windsor
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