

Exhibit

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA -- ATLANTA DIVISION**

MAID OF THE MIST)	
CORPORATION)	
and MAID OF THE MIST)	
STEAMBOAT COMPANY, LTD.,)	
)	CIVIL ACTION NO:
Plaintiffs,)	
)	1:09-CV-01543-WSD
v.)	
)	EMERGENCY MOTION
ALCATRAZ MEDIA, LLC,)	
ALCATRAZ MEDIA, INC. and)	
WILLIAM M. WINDSOR,)	
)	
Defendants.)	
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**EMERGENCY REQUEST FOR SPECIFIC APPROVAL TO FILE
MOTION FOR RECONSIDERATION OF MOTION FOR RELIEF FROM
JUDGMENT AND ORDERS, OR IN THE ALTERNATIVE, MOTION FOR
RELIEF FROM JUDGMENT AND ORDERS**

Plaintiff William M. Windsor (“Windsor”) hereby files this EMERGENCY REQUEST FOR SPECIFIC APPROVAL TO FILE MOTION FOR RECONSIDERATION OF MOTION FOR RELIEF FROM JUDGMENT AND ORDERS, OR IN THE ALTERNATIVE, MOTION FOR RELIEF FROM JUDGMENT AND ORDERS pursuant to Rule 60(b) and/or the Court’s Inherent Powers. Windsor shows the Court as follows:

1. The requirement that a “Request for Specific Approval” must be filed rather than actual motions was ordered by this Court.

2. This “Request for Specific Approval is filed as per this order.

3. Federal Rules of Civil Procedure Rule 60(b) gives a party the legal right to file a motion for relief from a final judgment, orders, or proceeding.

Windsor demands that right.

4. The five page limit of the order of this Court for “requests for consent” is totally inadequate, so Windsor is simply requesting his right to due-process – his right to file a proper motion and documents to seek relief from the final judgment, orders, and proceedings.

5. FRCP Rule 60(b):

On motion and just terms, the court may relieve a party or its legal representative from a final judgment, order, or proceeding for the following reasons:

(1) mistake, inadvertence, surprise, or excusable neglect;

(2) newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b);

(3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party;

(4) the judgment is void;

- (5) the judgment has been satisfied, released, or discharged; it is based on an earlier judgment that has been reversed or vacated; or applying it prospectively is no longer equitable; or
- (6) any other reason that justifies relief.

6. FRCP Rule 60(b) (1), (2), and (3) have a one-year statute of limitations, and Windsor must ask that the original filing date of the request must be established as the date of filing to preserve some rights.

7. Windsor will show mistakes, newly-discovered evidence, and fraud.

8. Windsor will also present evidence and arguments to show that fraud upon the court has been committed by attorneys, Judge Duffey, judges with the Eleventh Circuit, and the Clerks of the Courts.

9. Windsor will prove fraud upon the court in a most emphatic way, including testimony from former judicial employees.

10. Windsor also seeks to either take limited depositions or present this matter at a hearing where Windsor will be able to present witnesses with startling testimony, including former government employees who worked at the federal courthouses.

11. On September 22, 2011, this Court issued an order [Docket #307] denying the original Emergency Request saying the orders and judgments were not

specified. Windsor's Emergency Request was simply a request to be able to file a motion that would provide all the specifics.

12. The judgment, orders, or proceedings that Windsor seeks to set aside include everything that has happened in this proceeding, including but not limited to the creation of this so-called civil action, Docket #'s 4, 32, 33, 42, 52, 54, 6/16/2010 Writ of Execution, 56, 9/24/2010 oral order, 99, 105, 109, 125, 2/9/2011 oral order, 127, 133, 3/11/2011 docket entry order, 134, 135, 150, 151, 152, 158, 159, 160, 165, 166, 5/11/2011 docket entry order, 176, 181, 190, 199, 195, 196, 197, 198, 200, 208, 209, 222, 227, 228, 234, 243, oral decisions on 7/15/2011, 267, 268, 275, 291, 292, 293, 294, 296, 306, 307, 9/27/2011 Writ of Execution, and the failure to docket and process properly filed papers. All orders are included as the Rule 60(b) motion will contest the entire "proceeding" as well as specific fraud-upon-the-court relative to specific orders and other reasons that justify relief.

WHEREFORE, Windsor respectfully requests that the Court do as follows:

- (1) grant WINDSOR'S MOTION;
- (2) allow Windsor to file a proper motion and evidence;
- (3) allow Windsor to conduct depositions; and

(4) grant such other and further relief as justice requires in association with this Motion.

Respectfully submitted, this 28th day of September, 2011.



William M. Windsor
Pro Se

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VERIFICATION OF WILLIAM M. WINDSOR

I, William M. Windsor, swear that I am authorized to make this verification and that the facts alleged in the foregoing REQUEST are true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters I believe them to be true. This Notice is also a Sworn Affidavit.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 28th day of September 2011.

William M. Windsor

William M. Windsor

CERTIFICATE OF COMPLIANCE

As required by Local Rule 7.1D, N.D. Ga., I hereby certify that this pleading has been prepared in Times New Roman 14-point font, one of the font and point selections approved by this Court in Local Rule 5.1B, N.D. Ga.



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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing EMERGENCY REQUEST FOR SPECIFIC APPROVAL by depositing the same with the United States Postal Service with sufficient postage and addressed as follows:

Carl Hugo Anderson, Jr., Esq.
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Mr. Christopher Huber, Esq.
U.S. Attorney's Office
United States District Court
600 Richard B. Russell Federal Building and U.S. Courthouse
75 Spring Street, SW
Atlanta, Georgia 30303

This 28th day of September, 2011.



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