

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

William M. Windsor,	)	
Plaintiff	)	
	)	CIVIL ACTION NO.
v.	)	
	)	2011cv206243
Fulton County, Office of the Fulton County	)	
District Attorney, Paul Howard, Jr., Cynthia	)	
Nwokocha, Naomi Fudge, Rebecca Keel,	)	
Waverly Settles, Lieutenant English, Deputy Betts,	)	
Deputy Roye, Steve Broadbent, and Unknown	)	
Does,	)	
Defendants	)	
	)	

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**MOTION FOR RECORDING IN COURTROOM ON OCTOBER 7, 2011**

William M. Windsor (“Windsor or “Plaintiff”) hereby files this  
EMERGENCY MOTION FOR RECORDING IN COURTROOM ON OCTOBER  
7, 2011. Windsor shows the Court as follows:

1. On October 7, 2011, a hearing on a motion for temporary restraining order and preliminary injunction is scheduled.
2. Windsor has been contacted by media who would like to cover the hearing and record the proceedings.

3. The issue of the right of citizens to present charges to grand juries is of significant importance to citizens in Georgia and nationwide. People would like to see and hear the proceedings.

4. This is a civil case, and there are no juveniles involved.

5. There are no jurors involved.

6. Windsor believes recording may be allowed in the courtroom with approval of the judge.

7. Recording will be done only in the courtroom while the court is in session for Windsor's hearing. There will be no recording in any other part of the Courthouse.

8. All audible electronic devices will be turned off when they are in the courtroom.

9. There will be no recording of conferences between an attorney and a client, witness, or aide.

10. There will be no recording of conferences between attorneys

11. There will be no recording of conferences between counsel and the judge at the bench ("sidebars"),

12. There will be no recording of proceedings held in chambers.

13. There will be no recording of anything that the judge asks not to be recorded during the hearing.

14. For the reasons stated above, Windsor respectfully requests that this Court enter an order allowing recording in the courtroom as follows:

- a. that Windsor's MOTION FOR RECORDING is granted;
- b. that recording will be allowed subject to the restrictions expressed in this motion;
- c. that recording will be allowed by Fulton County Government Television or any other party or organization; and
- d. such other and further relief as the Court deems appropriate.

Respectfully submitted this 3rd day of October, 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 MOTION 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.

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 3rd day of October, 2011.

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

William M. Windsor

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing MOTION to each Defendant by mail addressed with the addresses for service shown in the Verified Complaint.

This 3rd day of October, 2011.



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**Pro Se**

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