

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

William M. Windsor, )  
Plaintiff )  
 ) CIVIL ACTION NO.  
v. )  
 ) \_\_\_\_\_  
Fulton County, Office of the Fulton County )  
District Attorney, Paul Howard, Jr., Cynthia )  
Nwokocha, Naomi Fudge, )  
and Unknown Does, )  
Defendants )  
\_\_\_\_\_ )

**MOTION FOR LEAVE OF COURT TO FILE FIRST AMENDMENT TO  
VERIFIED COMPLAINT TO ADD DEFENDANTS**

William M. Windsor (“Windsor or “Plaintiff”) hereby files this MOTION FOR LEAVE OF COURT TO FILE FIRST AMENDMENT TO VERIFIED COMPLAINT TO ADD DEFENDANTS. Windsor shows the Court as follows:

The VERIFIED COMPLAINT included Doe Defendants.

Windsor now seeks to name six additional Defendants. These are Rebecca Keel (Assistant District Attorney of Fulton County), Waverly Settles (Assistant District Attorney of Fulton County), Lieutenant English (Fulton County Deputy Sheriff), Deputy Betts (Fulton County Deputy Sheriff), Deputy Roye (Fulton County Deputy Sheriff), and Steve Broadbent.

Each of these people was identified as participating in wrongdoing in the VERIFIED COMPLAINT. These people are discussed in paragraphs 6, 7, 13, 18, 20, 23-28, 32, 34-39, 41, 43-46, 48-50, 52, 57, 59, 60, 64-69, 72, 73, 75-80, 88-90, 94-96, 102, 108-110, 113, 116-118.

There are no other changes to the VERIFIED COMPLAINT at this time, and there are no changes to the exhibits.

WHEREFORE, Windsor asks that this Court:

- (1) grant this Motion;
- (2) allow Windsor to file the FIRST AMENDMENT TO VERIFIED COMPLAINT to add six Defendants; and
- (3) grant such other relief as this Court feels is appropriate.

This 27th day of September, 2011.



**William M. Windsor**  
**Pro Se**

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**VERIFICATION OF WILLIAM M. WINDSOR**

I state that I am authorized to make this verification on behalf of myself and that the facts alleged in the foregoing VERIFIED COMPLAINT 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 27th day of September, 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**

TRAC  
TO: TRACY

TRACY  
Baker  
404 612-  
9599  
404 332-0453