

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

WILLIAM M. WINDSOR,)	
Plaintiff)	
)	
v.)	CIVIL ACTION NO.
)	
JUDGE WILLIAM S. DUFFEY,)	1:11-CV-01922-TWT
MAID OF THE MIST)	
CORPORATION, MAID OF THE)	
MIST STEAMBOAT COMPANY,)	
LTD., JUDGE ORINDA D. EVANS, *)	
JUDGE JULIE E. CARNES, JUDGE)	
JOEL F. DUBINA, JOHN LEY, AND)	
JAMES N. HATTEN,)	
Defendants.)	
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**MOTION TO DISQUALIFY SALLY QUILLIAN YATES, CHRISTOPHER
HUBER, AND THE U.S. ATTORNEY'S OFFICE**

Plaintiff William M. Windsor hereby files this MOTION TO DISQUALIFY SALLY QUILLIAN YATES, CHRISTOPHER HUBER, AND THE U.S. ATTORNEY'S OFFICE for consideration by the Court in connection with this matter.

1. Windsor has experienced massive dishonesty with Defendants in this Civil Action.

2. Some of the dishonesty has been facilitated by Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office.

3. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office are representing Defendant Judge Orinda D. Evans in matters involving Windsor before Defendant Judge William S. Duffey.

4. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office are now allegedly representing Defendant Judge Orinda D. Evans in this matter.

5. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office are now allegedly representing Defendant Judge William S. Duffey in this matter.

6. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office have been working with Maid of the Mist Corporation and Maid of the Mist Steamboat Company Limited (jointly "Maid"), the Plaintiffs in Civil Action 1:06-CV-0714-ODE, a matter in which Judge Evans presides.

7. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office have been working with Maid, the Plaintiffs in Civil Action 1:09-CV-01543-WSD, a matter in which Judge Duffey presides, Judge Evans is a participant who amounts to a co-Plaintiff against Windsor as a defendant.

8. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office have been working with the Defendants in Civil Action 1:09-CV-02027-WSD, a matter in which Judge Duffey presides, Judge Evans is a defendant, Maid is a Defendant, and Windsor is the Plaintiff.

9. Criminal charges against Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office have been presented to the Fulton County Georgia Grand Jury by Windsor.

10. Criminal charges against the Defendants have been presented to the Fulton County Georgia Grand Jury by Windsor.

11. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office have been working with the defendants in Civil Action 1:09-CV-02027-WSD, a matter in which Judge Duffey presides, Judge Evans, and Maid against Windsor in appeals involving Defendant Judge Dubina.

12. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office have ignored their legal obligations pursuant to 18 U.S.C. 4.

13. A demand was made for Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office to present Windsor's criminal charges against Defendants to the U.S. Grand Jury, and the U.S. Attorney's Office violated the law by failing to do so.

14. If this matter remains in this Court and is not remanded to Fulton County Superior Court, Windsor will amend to name Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office as parties to this Civil Action. One defendant cannot fairly represent another defendant.

15. Sally Quillian Yates, Christopher Huber, and/or the U.S. Attorney's Office will be expected to handle criminal prosecution of the Defendants.

16. Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office have a wide variety of conflicts that make it impossible for them to act as attorneys for anyone in this Civil Action.

17. This representation of Defendants by Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office is a blantant violation of the Rules of Professional Conduct under Rule 1.7 "Conflict of Interest" which states: "... when a disinterested lawyer would conclude that the client should not agree to the representation under the circumstances, the lawyer involved cannot properly ask for such agreement or provide representation on the basis of the clients consent."

WHEREFORE, Windsor respectfully requests:

- a. that this Court grant this motion; and

- b. that Sally Quillian Yates, Christopher Huber, and the U.S. Attorney's Office be disqualified from serving as attorneys for any party in this Civil Action except for themselves; and
- c. that this Court grant such other and further relief as is appropriate.

This 15th day of June, 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 15th day of June, 2011.

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

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.

This 15th day of June, 2011.

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

WILLIAM M. WINDSOR

Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of June 2011, I served this MOTION by depositing in the United States Mail with sufficient postage addressed to each Defendant and to:

CHRISTOPHER J. HUBER
ASSISTANT U.S. ATTORNEY
Georgia Bar No. 545627
600 Richard B. Russell Federal Bldg.
75 Spring Street, S.W. -- Atlanta, Georgia 30303
Telephone: (404) 581-6292 -- Facsimile: (404) 581-6181
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This 15th day of June, 2011.



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