

No. S12D0251

In The Supreme Court of the State of Georgia

In re WILLIAM M. WINDSOR

WILLIAM M. WINDSOR,

Petitioner

v.

Judge Jerry W. Baxter,
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,

Respondents

On Petition for Writ of Habeas Corpus or Discretionary Application

To The Fulton County Superior Court

MOTION FOR DISCOVERY

William M. Windsor

Pro Se

PO Box 681236

Marietta, GA 30068

770-578-1094

MOTION FOR DISCOVERY

Comes Now William M. Windsor (“Windsor” or “Petitioner”), and files this MOTION FOR DISCOVERY in conjunction with his Petition for a Writ of Habeas Corpus or Discretionary Application.

JURISDICTION

1. This Court has jurisdiction pursuant to O.C.G.A. 5-6-35 (a) (9) since the ORDER complained of denied a temporary restraining order. O.C.G.A. 5-6-35 (a) (7) may also apply since Judge Baxter has denied Windsor’s right to file a motion for new trial.

INTRODUCTION

2. Windsor believes the hearing transcript in the underlying action has been intentionally falsified. Windsor seeks discovery to compel production of documents and take depositions.

3. The Order Appealed is the October 7, 2011 Order (“ORDER”) entered by Judge Jerry W. Baxter in Civil Action 2011CV206243 in the Fulton County Superior Court. It was announced at a Hearing on Windsor’s Request for Temporary Restraining Order and Preliminary Injunction and issued shortly thereafter.

4. The hearing was held October 7, 2011 in the courtroom of Fulton County Superior Court Judge Jerry W. Baxter was a Kangaroo Court.

5. On October 26, 2011, Windsor received a transcript from court reporter Evelyn D. Parker.

6. The Transcript does not match Windsor's recollection of what happened at the Hearing. Others who were in the courtroom on October 7, 2011 say the transcript does not match their recollections either.

7. Windsor believes that Judge Jerry W. Baxter instructed his staff to have Evelyn D. Parker change the Transcript to meet his corrupt needs. David Chamberlain and Cristina Schnizler may have been involved.

8. Windsor has contacted court reporter Evelyn D. Parker, David Chamberlain, Cristina Schnizler, and Judge Jerry W. Baxter several times for an explanation. There has been no response.

9. This Motion is filed pursuant to Supreme Court Rule 26.

10. Windsor imagines that requests for discovery are unusual in this Court, but Windsor has no alternative. Judge Baxter and Chief Judge Wright will do nothing. Everyone who Windsor has contacted has been non-responsive.

WHEREFORE, Windsor prays as follows:

- a. that the October 7, 2011 ORDER be stayed so it has no force or effect;
- b. that Windsor's MOTION is granted;
- c. that the Clerk of the Court be ordered to issue subpoenas to Windsor so he may conduct depositions;
- d. that an order be issued authorizing Windsor to subpoena documents, recordings, and other records; and
- e. that the Court grant such other and further relief as justice requires in association with this Motion.

Submitted this 3rd day of November, 2011.



William M. Windsor
Pro Se
PO Box 681236
Marietta, GA 30068
Telephone: 770-578-1094
Facsimile: 770-234-4106
Email: williamwindsor@bellsouth.net

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.

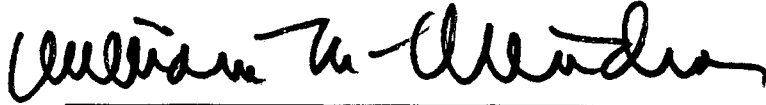
This 3rd day of November, 2011.

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 COMPLIANCE

I hereby certify that this pleading has been prepared in Times New Roman
14-point font.

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

P.O. Box 681236
Marietta, GA 30068
Telephone: 770-578-1056
Fax: 770-234-4106
williamwindsor@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing by electronic mail and by depositing a true and correct copy of the same in the United States mail, proper postage affixed thereto, addressed as follows:

Lanna Renee Hill
R. David Ware
Kaye Woodward Burrell
Jerolyn Webb Ferrari
Eddie Snelling, Jr.
Office of the Fulton County Attorney
141 Pryor Street, Suite 4038 -- Atlanta, GA 30303
404-612-0246 -- Fax: 404-730-6324
Lanna.hill@fultoncountyga.gov

This 3rd day of November, 2011.



William M. Windsor
Pro Se

PO Box 681236
Marietta, GA 30068
Telephone: 770-578-1094
Facsimile: 770-234-4106
Email: williamwindsor@bellsouth.net