

CASE NO. 13LF-CV00289

Allie L. Overstreet, Petitioner	§	IN THE CIRCUIT COURT
	§	
v.	§	15TH JUDICIAL CIRCUIT
	§	
William M. Windsor, Respondent	§	LAFAYETTE COUNTY, MISSOURI

EMERGENCY MOTION FOR DISCOVERY

William M. Windsor (“Windsor”) hereby files this EMERGENCY MOTION FOR DISCOVERY. Windsor shows the Court as follows:

1. Windsor is a 64-year-old grandfather. He is not a criminal. He is not a stalker. Windsor has never been charged with or convicted of a crime. This bogus allegation of stalking by Allie L. Overstreet (“Overstreet”) is the only time Windsor has ever been involved in a legal proceeding of this type. Windsor has not even received a traffic ticket or parking ticket in over 12 years. Windsor has never been in a jail or prison except as a visitor. Windsor has never used illegal drugs of any type. Windsor has never possessed illegal drugs of any type. Windsor does not consume alcoholic beverages.

2. Windsor has been producing and directing a documentary film and has been compiling testimony about corruption and liars that has been presented to

Congress and will be presented to every state legislator in America. As the result of this work, Windsor has made many enemies.

3. Windsor has become the victim of stalking, harassment, defamation, libel, slander, and threats (including some death threats). Windsor has been followed online and has been contacted online for the purpose of harassing and intimidating him. Stalkers have attempted to terrify, threaten, harass, annoy, and offend Windsor with lewd and profane language, claims of lewd and lascivious acts, threats to inflict physical harm, and more. Overstreet is one of these stalkers.

4. The stalking includes defamation and the making of false accusations and false statements. These false accusations include that Windsor is a pedophile, a pedophile lover, anti-gay, bigoted, a tax evader, a criminal operating a scam, a terrorist, and now a potential serial killer who, according to Allie L. Overstreet (“Overstreet”), has “bought a gun for use on a group of people.”

5. Windsor is the victim of an outrageous petition by Overstreet that has resulted in an Ex Parte Order of Protection. Overstreet has fabricated this claim against Windsor. Overstreet has demonstrated to Windsor that she is a pathological liar. Windsor also anticipates that she will fabricate evidence and likely have witnesses to lie for her.

6. Unfortunately, liars like Overstreet often get away with their lies in court proceedings. Windsor needs discovery to help him successfully defend against the lies of Overstreet.

7. Interrogatories to parties.

8. Pursuant to Missouri Revised Statutes 510.020, Windsor wishes to serve written interrogatories to be answered by Overstreet. Since 15 days is the established period of time for response, Windsor asks the Court to shorten the time so Windsor will have the answers prior to the April 8 hearing.

9. Windsor will serve the interrogatories within 48 hours after an order of the Court shortening the time. Windsor will then establish the response date as April 5, 2013.

10. Production of documents, papers, tangibles.

11. Pursuant to Missouri Revised Statutes 510.030, Windsor requests an order directing Overstreet to produce and permit the inspection and copying or photographing of any designated documents, papers, books, accounts, letters, photographs, objects, or tangible things, not privileged, which constitute or contain evidence material to any matter involved in the action and which are in her possession, custody, or control. Windsor requests that the production be made on

April 5, 2013 at Holiday Inn Express Suites, 19901 E Valley View Pky,
Independence, MO 64057.

12. Windsor requests an Order directing the appropriate person to produce all statements previously made by Overstreet when seeking the Protective Order.

13. **Request for Admissions.**

14. Windsor requests an order directing Overstreet to respond to a written request for the admission of the genuineness of any relevant documents described in and exhibited with the request or of the truth of any relevant matters of fact pertaining to such documents set forth in the written request. Copies of the documents will be delivered with the request. Windsor requests an order to provide that Overstreet's answer to the Request for Admissions be provided by April 5, 2013.

15. **Notice, how served on party.**

16. Since Windsor is restrained from contact with Overstreet, Windsor requests an order authorizing Windsor to serve these discovery requests on the Clerk of the Court, who will then provide them to Overstreet.

17. **Deposition.**

18. Windsor requests an Order directing Overstreet to appear for a deposition on April 6, 2013 at 1:00 pm at Holiday Inn Express Suites, 19901 E

Valley View Pky, Independence, MO 64057. Windsor requests permission to take the deposition. Windsor requests an amendment to the Ex Parte Order of Protection to allow the deposition as well as an order of the court to command the production of objects and documentary evidence on the taking of the deposition. Windsor requests permission to take the deposition by video due to the difficulty in obtaining a transcript prior to the April 8 hearing.

19. **Testimony by Affidavit.**

20. Windsor has witnesses nationwide who can testify on his behalf, but few can afford to come to Lexington, Missouri on April 8. Therefore, Windsor asks that he be allowed to file affidavits obtained from witnesses to be accepted as testimony on Windsor's behalf. In the alternative, Windsor seeks approval to conduct depositions by telephone.

21. For the reasons stated above, Windsor respectfully requests that this Court enter an order allowing the requested discovery to be accelerated as follows:

- a. that Windsor's EMERGENCY MOTION FOR DISCOVERY is granted;
- b. that Windsor may issue interrogatories with answers due on or before April 5, 2013;

- c. that Windsor may issue requests for production of documents with production due on or before April 5, 2013;
- d. that Windsor may issue requests for admissions with responses due on or before April 5, 2013;
- e. that Overstreet is ordered to appear for a deposition on April 6, 2013 at 1:00 pm at Holiday Inn Express Suites, 19901 E Valley View Pky, Independence, MO 64057;
- f. that the Ex Parte Order of Protection is amended to allow Windsor to take this deposition;
- g. that the deposition may be taken by video;
- h. that Windsor is authorized to serve these discovery requests on the Clerk of the Court, who will then provide them to Overstreet; and
- i. that Windsor will be allowed to file affidavits obtained from witnesses to be accepted as testimony on his behalf.

Submitted this 24 day of MARCH, 2013,



William M. Windsor
3924 Lower Roswell Road- Marietta, GA 30068
Email: nobodies@att.net
Phone: 770-578-1094 - Fax: 770-578-1057

Fax

William M. Windsor

3924 Lower Roswell Road * Marietta, GA 30068 * Cell: 770-578-1094 * Fax: 770-578-1057

To: Clerk for Judge John Frerking
15th Judicial Circuit Court
Post Office Box 10
Lexington, MO 64067

Fax: 660-259-4997
From: William M. Windsor

Date: March 24, 2013

Pages: 7

Dear Clerk for Judge Frerking:

Enclosed is an EMERGENCY MOTION FOR DISCOVERY.

Due to the short period of time between now and the April 8 hearing, I hope the Court can act on this motion ASAP.

Thank you.

Sincerely,

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

William M. Windsor

Fax Confirmation Report

Date & Time : 25-MAR-2013 04:01 MON
Fax Number : 17705781057
Fax Name : WINDSOR
Model Name : WorkCentre 3550

No.	Remote Station	StartTime	Duration	Page	Mode	Job Type	Result
001	16602594997	25-03 03:59	01' 42	007/007	EC	HS	Success

Abbreviations:

HS: Host Send	PL: Polled Local	CP: Completed	TS: Terminated by System
HR: Host Receive	PR: Polled Remote	FA: Fail	TU: Terminated by User
MS: Mailbox Save	WS: Waiting To Send	RP: Report	G3: Group3
MP: Mailbox Print	EC: Error Correct		

Fax

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