

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

ALEXANDRA “SONDRA” WILSON,	)	
	)	CASE NO. LAACL157381
Plaintiff,	)	
	)	PLAINTIFF ALEXANDRA WILSON'S
v.	)	(I) MOTION TO RECUSE; (II) MOTION
	)	TO CONTINUE (III) OBJECTION TO,
RELIABLE STREET INC., LOCKWOOD	)	and MOTION TO RESIST
CAFE, [President of Reliable Street Inc.],	)	DEFENDANTS' PRE-ANSWER MOTION
[Owner of Lockwood Cafe and Vice President	)	TO QUASH INSUFFICIENT SERVICE OF
of Reliable Street Inc.], [Lockwood Cafe	)	PROCESS (IV) OBJECTION TO, and
Employee #1], [Lockwood Cafe Employee #2]	)	MOTION TO RESIST DEFENDANTS'
, and [Defendants' Friend and Artist associated	)	MOTION TO CHANGE VENUE (V)
with Reliable Street Inc.]	)	MOTION TO ESTOP (VI) OBJECTION
	)	TO, and MOTION TO RESIST
	)	DEFENDANTS' MOTION TO RECAST
	)	(VII) MOTION TO AMEND PETITION
	)	(VIII) OBJECTION TO, and MOTION TO
	)	RESIST DEFENDANTS' MOTION TO
	)	DISMISS PLAINTIFF'S PETITION FOR
	)	FAILURE TO STATE A CLAIM
	)	

I, Plaintiff Sondra Wilson, pursuant to Iowa Code of Judicial Conduct Rule 51:2.11(A) file this Motion for Her Honorable Judge Samantha Gronewald to Recuse herself from this action.

After that motion is resolved and a new judge is assigned to this case, due to the fact that I am currently studying abroad this semester with Des Moines Area Community College and will not return to Iowa until around May 2, pursuant to Iowa Rule of Civil Procedure 1.911(1), I file this Motion to Continue this action preferably no sooner than May 15, 2024, as to be determined by the Court, and by that date will file an Amended Petition pursuant to Iowa Rules of Civil Procedure 1.402(4), and will commence service of Original Notices by publication for

Defendants [President of Reliable Street Inc.], [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.], [Lockwood Cafe Employee #2], [Lockwood Cafe Employee #1], and [Defendants' Friend and Artist associated with Reliable Street Inc.] pursuant to Iowa Rules of Civil Procedure Rule 1.310; Amended Petition will conform to the following standards:

(i) as an alternative to recasting, as moved by all Defendants on 2–29–2024 (presuming Defendants' Lockwood Cafe, [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.], [Lockwood Cafe Employee #1], [Lockwood Cafe Employee #2], and [Defendants' Friend and Artist associated with Reliable Street Inc.]'s Motion to Joinder with Reliable Street Inc. and [President of Reliable Street Inc.]'s Motions filed on 2–29–2024 is granted by the Court, to which I have no objection), I will amend my Petition so that:

(a) formatting conforms with Iowa Rule of Civil Procedure Rule 1.412; and

(b) more specific statements may be made in response to Defendants' Motion for a More Specific Statement, filed on 2–29–2024;

(c) certain claims I stated within my original petition, which Defendants alleged that I failed to state within their Motion to Dismiss Plaintiff's Petition for Failure to State a Claim, which I Object to and Move to Resist, may be more explicitly stated, except where Defendants appear to be attempting to usurp, undermine, and prevent the Discovery Process, and thus my Right to Due Process, from being exercised; and

(ii) provide sufficient time to serve Amended Petition and Original Notices, where necessary, on the Defendants.

Note that any Defendant may avoid Service by Publication via sending me an appropriate address for which service of process may be delivered.

Additionally, I file this Objection To and Motion to Resist Defendants Lockwood Cafe, [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.], [Lockwood Cafe Employee #1], [Lockwood Cafe Employee #2], and [Defendants' Friend and Artist associated with Reliable Street Inc.]'s Pre-Answer Motion to Quash Insufficient Service of Process due to the fact that, to the best of my knowledge, each were served in accordance with Iowa Rules of Civil Procedure Rule 1.306.

Furthermore, pursuant to Iowa Code of Civil Procedure Rule 1. 802(2), I file this Motion to Resist Defendants' Motion to Change Venue due to:

(i) prejudice of Story County judges and Story County inhabitants, as well as including undue influence a judge in Story County would likely face; and

(ii) Iowa District Court in and for Polk County has subject matter jurisdiction over the majority of claims, injuries, and rights described within my Petition, and upcoming Amended Petition, including but not limited to:

(a) the fraudulent document that was filed with the Iowa Civil Rights Commission by [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.] on behalf of Lockwood Cafe, and

(b) various libelous statements made against me, which were made by all named Defendants, within documentation submitted to the Iowa Civil Rights Commission by [Owner of Lockwood Cafe and Vice-President of Reliable Street Inc.], [President of Reliable Street Inc.], and [Defendants' Friend and Artist associated with Reliable Street Inc.].

Additionally, I file this Motion to Estop all Defendants from henceforth re-asserting false statements which were made within:

(i) filings submitted to the Iowa Civil Rights Commission on behalf of Lockwood Cafe by [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.], on behalf of Reliable Street Inc. by [President of Reliable Street Inc.], and by [Defendants' Friend and Artist associated with Reliable Street Inc.], and;

(ii) Defendants' Motions filed on 2-29-2024.

Also, I file this Motion to Resist Defendants' Motion to Recast, and instead, pursuant to Iowa Rules of Civil Procedure 1.402(4) file this Motion to Amend Petition.

I also file this Objection To, and Motion to Resist Defendant's Motion to Dismiss Plaintiff's Petition for Failure to State a Claim, as it is an excessively lengthy motion which, by prima facie examination, appears to serve at least three purposes:

(i) to prevent this civil action from moving forward into the discovery process, at which point the claims I have asserted will be shown to be meritorious;

(ii) to bury me in tedious legal research which cannot reasonably be performed within the brief ten day time limit allowed to respond to a motion by Iowa Rules of Civil Procedure Rule 1. 441(3);

(iii) to further injustices against me already performed by all Defendants via disallowing due process to occur.

Pursuant to Iowa Rules of Civil Procedure Rule 1. 431(4), I have responded to Defendants' motions filed on 2-29-2024 as expediently as possible, and request the Court, for the sake of prioritizing justice, to accept this set of motions, and order them as filed within a timely manner, as allowed by Rule 1.431(4) and/or other sections of law or standing rulings.

## Introduction

1. On 2—8—2024 I filed a Petition to commence a civil action for case # LACL157953 against Defendants Kim Reynolds for Iowa and the State of Iowa. Governor Reynolds and District Associate Judge for Iowa District 2B (Story County) Steven Van Marel are both named in the lawsuit for having caused rights violations against me, for performing discriminatory acts against me due to my status as a transgender woman, and for having malicious intent in their actions.

2. Governor Kim Reynolds appointed Her Honorable Judge Samantha Gronewald in December 2017.

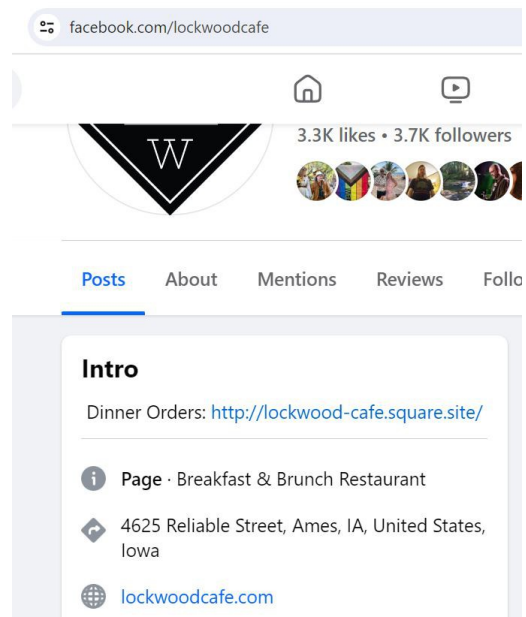
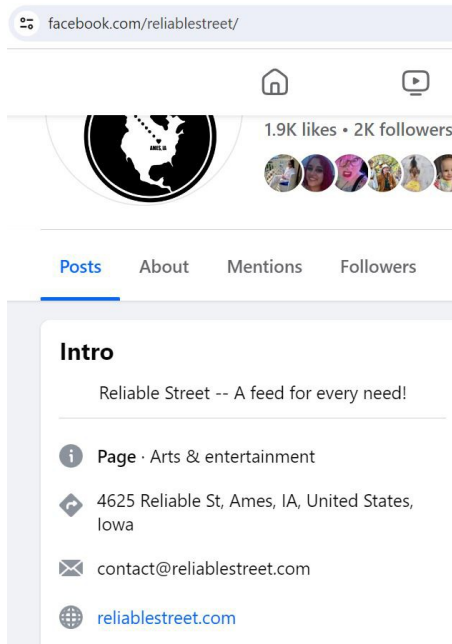
3. I do not believe I would get a fair trial under Judge Gronewald or within Iowa District 2B Court.

4. Defendant asserted that this action is the latest in a string of unsubstantiated claims, however one of the primary purposes of this action is to substantiate the claims asserted; this will generally occur during the discovery process and trial. Thus far no government investigation and thorough review of evidence has occurred.

5. Within Defendant's "Motion to Change Venue and Dismiss", filed 2—29—2024, Defendants asserted "Defendant Lockwood Café operates in the same building as Reliable Street"; in fact they share the same address, as the following screenshots from their Facebook pages confirms:

Reliable Street Inc.:

Lockwood Cafe:



Pursuant to Iowa Rules of Civil Procedure Rule 1. 302(4), Reliable Street Inc. and Lockwood Cafe appear to have been appropriately served at their addresses by Story County Sheriff's Deputy Jason Grubbs on 2–9–2024.

6. Within Defendant's "Motion to Change Venue and Dismiss", Defendants asserted "Defendant [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.] is owner and operator of Lockwood Café"; according to Reliable Street Inc.'s response to the Questionnaire sent to them by the Iowa Civil Rights Commission, [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.] is (or was at the time) also the Vice President of Reliable Street Inc.

7. Within Defendant's "Motion to Change Venue and Dismiss", Defendants asserted "Defendant [Lockwood Cafe Employee #2] is a former employee of Lockwood Café"; due to the fact that I was unjustly barred from the premises since March 31, 2022, I have not been in contact with the Defendants, and was unaware [Lockwood Cafe Employee #2] no longer works

at Lockwood Cafe.

8. Within Defendants' "Motion to Change Venue and Dismiss", Defendants asserted "Defendant [Defendants' Friend and Artist associated with Reliable Street Inc.] is a former customer at Lockwood Café"; in fact [Defendants' Friend and Artist associated with Reliable Street Inc.] has, on multiple occasions, had art exhibits wherein several pieces of their art were displayed as a primary exhibit within Reliable Street Inc.'s art gallery.

9. [Defendants' Friend and Artist associated with Reliable Street Inc.] was, and may still be, a close friend with Defendant [Lockwood Cafe Employee #1].

10. [Defendants' Friend and Artist associated with Reliable Street Inc.] collaborated with at least one of the Defendants via submitting false, defamatory statements against me to the Iowa Civil Rights Commission:

(i) as a form of retaliation against me for having filed a legitimate complaint against Lockwood Cafe and Reliable Street Inc;

(ii) to convince the Iowa Civil Rights Commission to not investigate my complaint; and

(iii) to potentially use allegations against me as political tool in the future for use in attacking my reputation.

11. Defendant [Defendants' Friend and Artist associated with Reliable Street Inc.] omitted the true nature of their relationship with fellow Defendants within their statement to the Iowa Civil Rights Commission.

12. All Defendants omitted the true nature of [Defendants' Friend and Artist associated with Reliable Street Inc.]'s relationship (association) with Reliable Street Inc. and [Lockwood Cafe Employee #1] within their Motion to Change Venue and Dismiss.

13. Within Defendants' "Motion to Change Venue and Dismiss", Defendants stated, "In early 2022, Reliable Street Inc. and Lockwood Café barred Plaintiff from the premises due to reports of harassing conduct towards customers and employees." These reports were acts of defamation committed against me by Defendants [Lockwood Cafe Employee #1], [Lockwood Cafe Employee #2], and presumably [Defendants' Friend and Artist associated with Reliable Street Inc.], who are a clique of friends (or at least were at the time).

14. Line 8 within Defendants' "Motion to Change Venue and Dismiss" asserted, "Defendants—who include current and former Lockwood Café employees, as well as a customer—have been subject to years of harassing conduct by Plaintiff, both inside and outside of the legal system"; I did not know the Defendants for "years", nor did I ever harass any of them.

15. Within Defendants' "Motion to Change Venue and Dismiss", Defendants moved to change the venue to Story County "where all relevant conduct is alleged to have occurred; however, acts of libel and the fraudulent document were submitted within Polk County to the Iowa Civil Rights Commission. The majority and more severe injurious acts against me, with regard to this action, occurred in Polk County.

16. Defendants also seek dismissal of Plaintiffs claims for failure to state a claim; in fact my Petition complied with Iowa Rules of Civil Procedure Rule 1.402(2), and stated several claims for relief. However, within my Amended Petition I will attempt to address Defendants' assertions satisfactorily.

17. Within Defendants' "Motion to Change Venue and Dismiss", Defendants moved for the Petition to be recast, and for a more definite statement, so that Defendants may fully respond to the allegations contained therein; I move instead to amend the previous Petition, and,



in accordance with my Motion to Continue, serve the Amended Petition and Original Notices upon Reliable Street Inc. and Lockwood Cafe. Due to the fact that I do not know the locations of residences or usual places of abode, for Defendants [President of Reliable Street Inc.], [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.], [Lockwood Cafe Employee #1], [Defendants' Friend and Artist associated with Reliable Street Inc.], and [Lockwood Cafe Employee #2], I move to serve aforementioned parties by publication in accordance with Iowa Rules of Civil Procedure Rule 1.310. Alternatively Defendants may provide me with an address where they may be served.

### **Motion to Recuse**

18. Governor Reynolds appointed Her Honorable Judge Samantha Gronewald in December 2017.

19. Governor Reynolds has performed multiple acts of defamation and rights violations transgender Iowans.

20. On 2—8—2024 I filed a Petition to commence a civil action for case # LACL157953 against Defendants Governor Kim Reynolds and Kim Reynolds for Iowa.

21. Governor Kim Reynolds appointed Her Honorable Judge Samantha Gronewald in December 2017.

22. I question Judge Samantha Gronewald's impartiality with regard to this action.

23. Iowa Code of Judicial Conduct sec. 51:2:11 states, “(A) A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality\* might reasonably be questioned.”

24. Although subsections (A)(1) through (6) of sec. 51:2:11 provides examples

wherein a judge's impartiality might reasonably be question, Comment #1 reads “[1] Under this rule, a judge is disqualified whenever the judge's impartiality might reasonably be questioned, regardless of whether any of the specific provisions of paragraphs (A)(1) through (6) apply. The term "recusal" is used interchangeably with the term 'disqualification.’”

Your Honorable Judge Samantha Gronewald, prior to any other motions made by myself or Defendants are decided on by the Court, I respectfully request that you recuse yourself from this action.

### **Motion to Continue**

25. Iowa Code §614.1(2) sets the limitations period for actions of this nature to two years.

26. Whereas the original act of discrimination against me occurred on March 31, 2022, therefore the limitations period ought to end on March 31, 2024.

27. The Iowa Civil Rights Commission did not provide me with a sufficient amount of time to review evidence submitted to them on behalf of Reliable Street Inc. by [President of Reliable Street Inc.], on behalf of Lockwood Cafe on behalf of [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.], or, in collusion, by [Defendants' Friend and Artist associated with Reliable Street Inc.], before having to file this lawsuit. At the time the commission finally sent me a copy of the file, the commission's unjust and arbitrary process required me to file suit within 60 days, effectively shortening the limitations period from March 31, 2024 to December 5, 2023, which is the day I filed the Petition to commence this action. I was rushed, and as a result was not provided a sufficient amount of time to fully review the Iowa

Rules of Civil Procedure. I did my very best to file this action and serve process in accordance with the rules within the shortened time frame the commission's unfair process allowed, and in doing so may have made an error in service in process.

28. According to an editorial by Lucas Grundmeier entitled “Iowa should stop tilting the scales in civil rights cases”, published by the Des Moines Register in 2023 (link: <https://eu.desmoinesregister.com/story/opinion/editorials/2023/05/14/iowa-civil-rights-commission-tilting-scales/70204156007/>),

“a thorough investigation [in 2022] by a volunteer oversight board” found that Iowa Civil Rights Commission's practices “advantage employers” and “put too much burden on Iowans”. The article states that “the commission asks the employer... to explain any non-discriminatory reasons for how it treated a worker. If the worker does not adequately rebut those reasons, the case is usually closed. There’s one problem: The worker is never shown the employer’s explanation.”

29. Although I was not employed by Reliable Street Inc., I was discriminated against by [President of Reliable Street Inc.] and [Vice President of Reliable Street Inc.], and was not shown documentation submitted to the Iowa Civil Rights Commission by [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.], [President of Reliable Street Inc.], and [Defendants' Friend and Artist associated with Reliable Street Inc.] at the time the commission decided not to investigate the case.

30. Had I been shown documentation submitted by these defendants to the commission at the time their decision not to investigate was made, I believe I could have successfully rebutted all Defendants' defamatory statements against me within the appeal I submitted to the commission on 9–3–2022. Instead the commission's arbitrary process:

(i) requires complainants to request a letter-of-right-to-sue before being able to request a

copy of the file (which contains the evidence);

(ii) wait 30 days before receiving a copy of the file;

(iii) requires complainants to file the lawsuit within 90 days of requesting the letter-of-right-to-sue, thus only having 60 days to file the action after being shown the evidence.

31. The Iowa Civil Rights Commission's unfair process appears to have caused me to improperly serve several of the Defendants, and to have written a more hastily written Petition than I would have had I not been laden with undue burden by the commission's process.

32. On February 9, 2024 I traveled to London to study abroad for a semester with Des Moines Area Community College. I will not return to Iowa until early May.

33. It is impractical and overly-burdensome to me to have to amend my Petition and serve Original Notices on Defendants from here in London; I must focus on my homework and discipline project required for DMACC Honors instead.

34. Iowa Rules of Civil Procedure Rule 1.911(1) “A continuance may be allowed for any cause not growing out of the fault or negligence of the movant, which satisfies the court that substantial justice will be more nearly obtained.”

Your Honor, it is not my fault nor through my negligence that some Defendants may not have been properly served, pursuant to Iowa Rule of Civil Procedure 1.911(1), I file this Motion to Continue this action on or around May 15, 2024, at which time, I will file and serve an amended Petition which will conform to the following standards to the best of my ability:

(i) as an alternative to recasting, as moved by all Defendants on 2-29-2024 (presuming Defendants' Lockwood Cafe, [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.], [Lockwood Cafe Employee #1], [Lockwood Cafe Employee #2], and [Defendants' Friend

and Artist associated with Reliable Street Inc.] Motion to Joinder with Reliable Street Inc. and [President of Reliable Street Inc.]'s Motions filed on 2–29–2024 is granted by the Court, to which I have no objection), I will amend my Petition pursuant to Iowa Code of Civil Procedure 1. 402(4) so that:

(a) formatting conforms with Iowa Rule of Civil Procedure Rule 1.412; and

(b) more specific statements may be made in response to Defendants' Motion for a More Specific Statement.

(ii) provide sufficient time to serve Amended Petition and Original Notices, where necessary, on the Defendants.

I will act with due diligence to serve all parties expediently and in accordance with the Iowa Rules of Civil Procedure upon my return to Iowa.

**Objection to, and Motion to Resist  
Pre-Answer Motion to Quash Insufficient Service of Process**

35. Various reasons for which some Defendants may not have been properly served are detailed within my Motion to Continue, lines 25 – 34.

36. Iowa Rules of Civil Procedure Rule 1. 911(1) “A continuance may be allowed for any cause not growing out of the fault or negligence of the movant, which satisfies the court that substantial justice will be more nearly obtained.” Iowa Rules of Civil Procedure Rule 1. 302(5) states, “If the party filing the papers shows good cause for the failure of service, the court shall extend the time for service for an appropriate period.”

37. I allege it was not my fault that Defendants may have been improperly served, and believe I have shown good cause for failure of service.

38. I allege it would cause substantial injustice if this case is dismissed against several Defendants based upon an error in service of process which may have occurred, as it did not grow out of my fault or negligence, and it would violate my Due Process rights.

39. I do not know the addresses of Defendants' places of residence or usual places of abode.

40. Pursuant to Iowa Code of Civil Procedure Rule 1.310, it appears I need to serve Defendants by publication.

Your Honor, due to reasoning provided within my Motion to Continue, and stated herein, I respectfully request the Court to deny Defendants' Pre-Answer Motion to Quash Insufficient Service of Process, and instead allow reasonable time to amend my petition and serve all parties in accordance with Iowa Code of Civil Procedure Rule 1.310 following my return to the United States, at the beginning of May this year.

#### **Objection to, and Motion to Resist Defendants' Motion to Change Venue**

41. According to Iowa Rules of Civil Procedure Rule 1.802(2), "Change of venue shall not be allowed... Under rule 1.801(3) where the issues are triable to the court alone, except for prejudice of the judge."

42. According to Iowa Rules of Civil Procedure Rule 1.802(3) Until the issues are made up, unless the objection is to the judge.

43. According to Iowa Rules of Civil Procedure Rule 1.801(3), "On motion, the place of trial may be changed in the following situations: If the trial judge or the inhabitants of the county are so prejudiced against the moving party, or if an adverse party has such undue influence over the county's inhabitants that the movant cannot obtain a fair trial. The motion in

such case shall be supported by affidavit of the movant and three disinterested persons, none being the agent, servant, employee or attorney of the movant, nor related to the movant by consanguinity or affinity within the fourth degree. The other party shall have a reasonable time to file counter affidavits. Affiants may be examined pursuant to rule 1.431(6).”

44. In 2022 I discovered that Story County Presiding Judge Steven Van Marel was involved in a scandal against me in 2006 and 2009.

45. I filed a complaint against Judge Van Marel with the Iowa Judicial Qualifications Commission in 2023.

46. I filed a lawsuit, case # LACL157953, against the State of Iowa on 2-8-2024, case # LACL157953. Within my Petition, details of the scandal, including the roles of additional local government officials who performed injurious acts against me, are described.

47. I experience a great deal of trauma, and suffer Post Traumatic Stress Disorder (PTSD), in part caused by traumatic events surrounding injustices I have faced at the hands of multiple government officials who work or worked in Story County, including Judge Van Marel.

48. It would cause me great trauma to have a trial in Story County, and I believe it would cause me to stumble and show signs of PTSD symptoms in court which would adversely impact the outcome of the case and cause undue stress and emotional pain and suffering to my health.

49. Due to the fact that Lockwood Cafe and Reliable Street Inc. are popular places of business within Story County, I am concerned inhabitants of Story County and judges will act are prejudiced against me, as the judge may experience undue influence. I do not believe I will receive a fair trial in Story County due to popularity of Defendants and prejudices of judges.

50. Defamatory statements made against me by Defendants, and the fraudulent document filed against me, were submitted to the Iowa Civil Rights Commission, which is located within the jurisdiction of Iowa District Court in and for Polk County; the Polk County Court has subject matter jurisdiction over the majority of the matter within this action.

Your Honor, transferring venue from Polk County to Story County would likely cause a miscarriage of justice to occur due to undue influence against, and likely prejudice of the judge and Story County inhabitants against me, and due to the fact that Iowa District Court in and for Polk County has subject matter jurisdiction over the majority of the matter within this action, I respectfully request the Court to deny Defendants' motion to transfer venue.

#### **Motion to Estop**

51. Defendants asserted that Defendant [Defendants' Friend and Artist associated with Reliable Street Inc.] was merely a customer of Lockwood Cafe; Defendants, however, withheld information from the court within that statement; in fact [Defendants' Friend and Artist associated with Reliable Street Inc.] was (and may still be) close friends with Defendant [Lockwood Cafe Employee #1]. Additionally, [Defendants' Friend and Artist associated with Reliable Street Inc.] has, on multiple occasions, had a many pieces of art displayed within Reliable Street Inc.'s art gallery.

52. Within Defendant's "Motion to Change Venue and Dismiss", Defendants asserted "Defendant [Owner of Lockwood Cafe and Vice President of Reliable Street Inc.] is owner and operator of Lockwood Café"; according to Reliable Street Inc.'s response to the Questionnaire sent to them by the Iowa Civil Rights Commission,



[Owner of Lockwood Cafe and Vice President of Reliable Street Inc.] is (or was at the time) also the Vice President of Reliable Street Inc., I respectfully request the Court estop any and all Defendants from asserting aforementioned inaccurate statements; instead Defendants ought accurate describe each person's role or else they ought be impeached as witnesses. If the court would like additional evidence in order to prove assertions I have made herein, I request to present evidence to the Court.

**Motion to Resist Defendants' Motion to Recast (Motion to Amend)**

Your Honor, Iowa Rules of Civil Procedure Rule 1.402(4) allows a party to amend a pleading once as a matter of course at any time before a responsive pleading is served, I respectfully request the court to allow me to amend the petition instead of recasting it.

**Objection to, and Motion to Resist  
Defendants' Motion to Dismiss Plaintiff's Petition for Failure to State a Claim**

53. Lines 53 through 89 within Defendants' Motion to Dismiss Plaintiff's Petition for Failure to State a Claim appear to serve at least three purposes:

(i) to prevent this civil action from moving forward into the discovery process, at which point the claims I have asserted will be shown to have merit;

(ii) to bury me in tedious legal research which cannot reasonably be performed within the brief ten day time limit allowed to respond to a motion by Iowa Rules of Civil Procedure Rule 1.441(3);

(iii) to further injustices against me already performed by all Defendants via disallowing due process to occur.

Your Honor, I respectfully request the Court deny Defendants' Motion to Dismiss; instead, within my amended petition, I will seek to more specifically assert each claim where

appropriate in order to provide a more accurate description. I object to Defendants' multiple requests to dismiss this action in its entirety, as they are attempts to deny me due process and disallow evidence and testimony to be presented. I assure the Court that, upon reviewing the evidence, it will become self-evident to the judge the exact reason Defendants have gone to such great length to try to prevent evidence from being examined. It would create a miscarriage of justice to dismiss this case during this early phase of the action.

Ms. Alexandra "Sondra" Wilson  
[Redacted]  
Ames, IA 50014  
Phone: [Redacted]  
Email:  
[Sondra.Wilson777@gmail.com](mailto:Sondra.Wilson777@gmail.com)

*Pro Se Litigant, US Citizen, Citizen  
of the State of Iowa, all rights  
reserved.*

Copy to:  
[Redacted]

Cedar Rapids, IA 52406-2804

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of this document will be served upon the persons listed on this document at the addresses indicated on EDMS by transmitting a copy via Royal Mail on March 18, 2024, at which time I will have access to a printer (my school is closed today, and cannot afford printing costs). I declare under penalty of perjury that the foregoing is true and correct.

[Redacted Signature] 3/15/2024