

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

ALEXANDRA “SONDRA” WILSON,)
) CASE NO. LACL157381
 Plaintiff,)
)
 v.) PLAINTIFF ALEXANDRA WILSON'S
) (I) MOTION TO RECONSIDER
) ORDER NOT TO RECUSE (II) MOTION
 RELIABLE STREET INC, LOCKWOOD) TO RECONSIDER ORDER TO
 CAFE, [REDACTED],) TRANSFER VENUE (III) RESISTANCE
 [REDACTED], and [REDACTED]) TO DEFENDANTS' MOTION TO
) DISMISS (IV) RESISTANCE TO
) DEFENDANTS' MOTION TO ENLARGE
) ORDER TO TRANSFER VENUE
)

Pursuant to Iowa R. Civ. P. 1. 904(3) I, Sondra Wilson, file this motion for Judge Gronewald to reconsider both interlocutory orders she filed on March 15, 2024.

I also resist Defendants' motions to dismiss and to enlarge order to transfer venue.

Introduction

1. On March 31 I filed a complaint with the Iowa Judicial Qualifications Commission against Judge Samantha Gronewald for violations of Iowa Code. Jud. Cond. 51:2.11 and my right to a fair trial (Exhibit B).

2. On March 19 Defendants filed the following:

(I) a joinder to motions filed by Defendants Reliable Street Inc. and Lyndsay Nissen on Feb. 29, including a (I) Motion To Change Venue; (II) Motion To Dismiss; (III) Alternative Motion To Recast; and (IV) Alternative Motion For A More Specific Statement;

(ii) a Reply in Support of Defendants’ Motion to Dismiss;

(iii) a Response to Plaintiff's Omnibus Motion; ("Doc 1")

(iv) a Motion to Enlarge Order Granting Motion to Change Venue. ("Doc 2")

3. Within Reply in Support of Defendants' Motion to Dismiss, Defendants wrongly stated "It does not appear that Plaintiff has provided any substantive resistance to the Motion to Dismiss" and "Plaintiff appears to resist Defendants' Motion to Dismiss by stating she will file an Amended Complaint at some point in the future" (Doc 1, line 5 and 6)

In fact within the "Objection to, and Motion to Resist Defendants' Motion to Dismiss..." I filed on March 15, I stated, "Defendants' Motion to Dismiss... appears to serve at least [the following] 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.....

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." (line 53)

4. Within the same Reply, Defendants stated, “The Motion to Dismiss should be evaluated in light of allegations on the face of pleadings that have been filed—not those that Plaintiff says will be filed in the future, or new allegations contained within a motion.” (line 9). Note that Defendants proposed that I recast the initial pleadings, and now within their Reply instead they argue that I should not be given that opportunity.

5. My initial pleadings complied with Iowa R. Civ. P. 1. 402(2), “Each averment of a pleading shall be simple, concise, and direct. No technical forms of pleadings are required.” Note that I accidentally wrote “five Defendants” instead of “seven Defendants”, however that error was inconsequential (not “major” as Defendants alleged) and ought not merit recasting.

6. The other parts of Defendants' Motion for a More Specific Statement, including:

(i) “the petition does not state which causes of action are applicable to particular defendants”;

(ii) “the petition does not provide sufficient detail regarding the purported 'agreement' between Plaintiff and Defendant Reliable Street”; and

(iii) “the petition does not make any allegations of any conduct on the part of Defendant Nissen”;

Appear:

(i) dilatory in nature, designed to delay and cast doubt on the proceedings;

(ii) designed to get the case dismissed prior to entering into the discovery and trial phases of the proceedings, because within those phases the claims and allegations I have stated may easily be proven,

(iii) designed to violate my rights to due process and to a fair trial; and

(iv) designed to tease out preliminary statements from me for the purpose of enabling all Defendants to get their stories straight so that they may further the conspiracy of fraud the group of

Defendants are currently being sued for. While some Defendants currently may not know who said what or to whom – and some may not know what exactly Defendants Reliable Street Inc., Lockwood Cafe, ██████████, and ██████ submitted to the Iowa Civil Rights Commission – or that statements submitted were in fact provably false – for the sake of justice it is better that the statements I made in my initial Petition remain as is, so as not to allow Defendants the opportunity to align their stories prior to interrogatories and depositions which will occur at a later stage in the proceedings.

7. All Defendants except Reliable Street Inc. and ██████████ filed a Motion to Quash on February 29.

8. Defendants' repeated attempts to get service quashed and the case dismissed based on inconsequential technicalities appear to be designed to entice the judge into throwing out the case prematurely in order to:

(i) prevent this case from entering the discovery process and trial phases of the proceedings, at which point I will be able to prove the claims and allegations alleged within my Petition;

(ii) violate my rights to due process and a fair trial.

9. Defendants attempted to get service quashed due to improper service, but then accepted service. This appears to be one of several attempts to get this case dismissed prior to entering the discovery and trial phases. Had service been quashed, Defendants would have likely moved to dismiss the case due to insufficient service. My timely motion appears to have interrupted that plan, which is presumably why they have now accepted service.

10. Defendants appear determined to get this case thrown out before it goes to trial because at least some Defendants have knowledge of the fraudulent document that was

submitted to the Iowa Civil Rights Commission, and they do not want it the document to be entered into evidence because it substantiates that part of my claim, and could be seen as an embarrassment; the same is true of multiple defamatory statements I can prove to be false. If some Defendants do not have knowledge of the fraudulent document or of certain instances of defamation against me, once these enter into evidence, those Defendants who have been kept in the dark might no longer support the defense of this action. It appears to me that some Defendants have not been fully informed of tortious actions performed against me by other Defendants, and the numerous attempts to prevent this case from entering the discovery phase are designed to prevent this from coming to light. I do not know what Attorney Paul Esker has or has not been told by Defendants. It is important that interrogatories and depositions are entered by each of the Defendants prior to me divulging too much information, which could alter more honest statements which might otherwise be given.

11. Defendants appear determined to get this case thrown out before it goes to trial because all Defendants have knowledge that libelous statements were submitted to the Iowa Civil Rights Commission, and they don't want evidence that these statements were false to be examined in court. I currently possess evidence which proves several statements that were submitted to the Iowa Civil Rights Commission, from several of the defendants, were known to be false at the time they submitted it. It is possible that one of the Defendants is caught in the middle and has been manipulated, by other Defendants. It is possible that Defendant may file a cross claim against other Defendants once they see the manner in which they have been manipulated, and how I have been harmed by it. At this point, however, it appears to me that all Defendants conspired together.

12. On March 19 Defendants Resisted my Motion to Continue filed on March 15, stating, “Plaintiff has demonstrated an ability to ably file documents from London” and “Plaintiff is not entitled to a *carte blanche* extension of court deadlines because she now finds the lawsuit that she filed to be inconvenient.” (Doc 1, lines 14 and 15)

13. My Professors, who have been made aware of this lawsuit and how Defendants severely damaged my reputation, gave me extensions on my essays so that I could file the previous motion on time. They also provided an extension so I could file this motion on time. After filing this motion, I must switch gears and immediately begin catching up on my homework and discipline project. I re-iterate, as stated within my previous motion, that my school work requires me to focus while here in Europe, and that I will not return until around May 2.

Motion to Reconsider Order Not to Recuse

14. The complaint I filed with the Iowa Judicial Qualifications Commission on March 31 2024, due to Judge Gronewald's misconduct, states: “I filed a motion for Judge Gronewald to recuse herself, citing Iowa Code. Jud. Cond. 51:2.11 while providing sufficient reason as to why she ought to recuse herself (she was appointed by Kim Reynolds, who is a defendant in the case I filed against the State of Iowa and Kim Reynolds for Iowa, Case #LACL157953). Kim Reynolds has shown hostility toward transgender women in her statements and rights violations she performed, as described in Case #LACL157953.

At the same time I filed the motion to recuse, I filed a resistance to defendants' motion to transfer venue to Story County, citing sufficient reasons to deny the motion according to Iowa R.

Civ. P. 1. 801(3), '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.'

I pointed out that multiple government officials, including a trial judge, are named in my lawsuit against the state due to discrimination and rights violations I experienced in that courtroom.

I also pointed out in my motion that Polk County has subject-matter jurisdiction over the case. According to Ballantine's Law Dictionary; Legal Assistant Edition,[1] 'Unlike personal or territorial jurisdiction, lack of subject-matter jurisdiction cannot be waived.'

Instead of recusing herself, as required, Judge Gronewald immediately denied my motion, and - while disqualified from doing so according to Iowa Code. Jud. Cond. 51:2.11 - ordered the case to be transferred to Story County, thus violating my right to a fair trial.

Judge Gronewald confirmed my suspicions - that her loyalty to Governor Reynolds and the Republican agenda (against transgender persons, and in favor of 'Building the Bench' with conservative justices: <https://www.iowagop.org/btb>) outweighs her Oath of Office, wherein she promised to 'administer justice according to the law' and respect for the State of Iowa's interest in keeping fair and just judiciary.

Judge Gronewald violated Iowa Code. Jud. Cond. 51:2.11 and my right to a fair trial.”

Your Honor, for reasons stated within my previous motion, and within the complaint I filed with the Iowa Judicial Qualifications Commission – that Iowa Code. Jud. Cond. 51:2.11 states that you are “disqualified” from issuing orders with regard to this case – I urge you to reconsider the Denial of my motion for you to recuse yourself, and to rescind your previous

order.

Motion to Reconsider Order to Transfer Venue

Your Honor, for reasons stated within the complaint I filed with the Iowa Judicial Qualifications Commission, I firmly believe it was inappropriate to issue any orders on this case. That should be left to another judge within the Polk County Court, which has subject-matter jurisdiction over the documents submitted to the Iowa Civil Rights Commission by the Defendants, whether submitted directly or indirectly, through their employer. Due to reasons stated within my previous Resistance to Defendants' Motion to Transfer Venue, and in accordance with Iowa R. Civ. P. 1. 904(3), I urge you to reconsider and then rescind your previous order.

Resistance to Defendants' Motions to Dismiss

15. Five Defendants attempted to get service of process quashed in what appears to have been an attempt to get the case dismissed. The response motion I filed on March 15 appears to have interrupted that plan because now Defendants have accepted service.

16. To clarify, and in response to lines 40-41 within Defendants' Motion to Dismiss Plaintiff's Petition for Failure to State a Claim filed on February 29, and joinder filed on March 19, I have enough knowledge to firmly allege that the following three Defendants discriminated against me::

- Reliable Street Inc.
- [REDACTED], President
- [REDACTED], Vice President

It is possible that other Defendants discriminated against me, however Defendants have

not been upfront and communicated directly with me since the time I was discriminated against, which has made it impossible for me to determine the exact roles of each party. In fact the reason I filed a complaint with the Iowa Civil Rights Commission was to enter into a mediation process; I was told by the Commission's Secretary, before I filed, that cases usually end up with a Mediator who helps parties talk through things, followed by a settlement. We never reached this amicable process, however, because instead of:

(i) responding to the letter I sent to Defendants Reliable Street Inc., Lockwood Cafe, [REDACTED], and [REDACTED] on April 12, 2022; or

(ii) submitting factual statements about what happened,

Defendants appear to have banded together in order to trash my name in order to protect the reputations of themselves, their friends (each other), and the businesses they worked for (or benefited from, in the case of Defendant [REDACTED], whose art was displayed in Reliable Street's art gallery on multiple occasions, and whom I have been told was provided studio space by Reliable Street, despite Defendant(s) writing to the Commission and to this Court that [REDACTED] was merely a “customer of Lockwood Cafe”). We can review this evidence later in the proceedings.

17. Also to clarify, with regard to the agreement that Defendants [REDACTED], [REDACTED], Reliable Street Inc., and Lockwood Cafe and I entered into (to which these Defendants are fully aware of, despite their Motion wherein they feign to not know about it in their Motion to Dismiss Plaintiff’s Petition for Failure to State a Claim, lines 66 –68 and 98), it is the same agreement wherein [REDACTED] acknowledged, in an email on Jan. 29, 2022, that I was “taking the lead on the community garden this upcoming season” alongside [REDACTED]. Again, my initial pleadings complied with Iowa R. Civ. P. 1. 402(2), “Each averment of a pleading shall be simple, concise,

and direct. No technical forms of pleadings are required.” A more specific statement is not needed, nor should my simple, concise, and direct claims be dismissed. We may examine additional evidence and elements of the agreement in court, but I should not be required to expound on the agreement, as it could adversely affect upcoming interrogatories and depositions, enabling Defendants to attempt to align their stories unfairly, in a second attempt to trash my reputation as a defense for their wrongdoings. I am reminded of a Mark Twain quote, “If you tell the truth you don't have to remember anything.”

18. Dismissing this case at this point would violate my rights to due process and to a fair trial.

19. Dismissing this case would indicate to taxpayers that Iowans have no recourse against discrimination, defamation, fraud, or breaches of agreement.

20. Dismissing this case would amount to a miscarriage of justice.

21. Dismissing this case would cause me additional emotional pain and suffering than that which Defendants have already inflicted upon me.

Your Honor, on numerous occasions throughout their several court filings, Defendants have attempted to get this case thrown out in order to prevent evidence from being submitted and examined by the court. As we enter into the discovery phase of the proceedings, it will become self-evident as to why Defendants have been so determined to prevent this from moving forward; it is because *the evidence will speak for itself*, or “*res ipsa loquitur*”. Again, I urge you, Your Honor, not to dismiss this case, as it would serve only to conceal the tortious actions Defendants committed against me.

Resistance to Defendants' Motion to Enlarge Order to Transfer Venue

22. This case should not have been transferred to Story County. According to Iowa Code. Jud. Cond. 51:2.11, Judge Gronewald was disqualified from issuing the order to do so.

23. Defendants are now seeking to have me charged for court costs which should not exist, and for their attorneys' fees. These are examples of how Defendants have sought to amend their previous injuries against me via injuring me yet again (as in, defaming me in order to retaliate against me for having filed a legitimate civil rights complaint). This motion is a prime example of the abusive relationship I unknowingly entered into with the Defendants, which to this day I regret.

24. I object to paying attorneys fees for the people who are currently abusing me; indeed, the defamatory statements Defendants made against me, and harm those statements currently inflict upon me and my livelihood, are a continuing injury, "An injury that is still in the process of being committed." (Black's Law Dictionary, 10 ed.)

25. Within their motion, Defendants stated, "Defendants request expeditious resolution of these Motions, as well as the case as a whole." (Doc 1, line 17) While knowing that I am studying abroad this semester, and focusing on my schoolwork and discipline project for DMACC Honors, Defendants appear to want to capitalize on this, essentially stating, "Maybe Sondra is so busy with schoolwork that she won't have time to file a response motion on time, and we can get the case dismissed!" Fortunately, my Professors have granted me extensions on my assignments once again in order to provide me with enough time to file this motion on time. I am now very behind on homework, and need the continuance even moreso than I did previously.

Your Honor, if Judge Gronewald does not rescind her order to transfer venue, I will likely

seek a motion to vacate and for a new trial. I object to paying for Defendants' attorneys fees. Let us first enter into due process and a fair trial, and we will discuss compensation and damages during the later stages in the proceedings, after evidence has been examined, facts established, and judgment rendered. Thank you for your consideration in these matters.

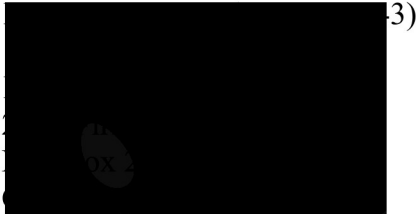
Dated: 4/1/2024

/s/ Sondra Wilson
Ms. Alexandra "Sondra" Wilson



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Copy to:



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 April 2, 2024, at which time I will have access to a printer (my school and the post offices are closed today due to Easter Monday). I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sondra Wilson