

IN THE IOWA DISTRICT COURT POLK COUNTY

ALEXANDRA "SONDRA" WILSON,	)	
	)	CASE NO. 05771 LACL157953
<i>Petitioner,</i>	)	
	)	PLAINTIFF ALEXANDRA WILSON'S
v.	)	(I) REQUEST FOR EXTENSION OF
	)	DEADLINE TO SERVE and (II) in the
KIM REYNOLDS FOR IOWA and	)	alternative REQUEST TO ALLOW TIME
STATE OF IOWA	)	FOR DEFENDANT TO RESPOND
	)	
<i>Respondents</i>	)	
	)	
	)	
	)	

Your Honor, due to what I suspect to have been PTSD symptoms which became triggered, I believe I made an error in attempting service upon KIM REYNOLDS FOR IOWA, as there is one method of service I ought to have attempted which I did not notice until now: service by mail in accordance with Iowa R. Civ. P. 1. 442(2). I humbly request the Court to consider my circumstances in context with the symptoms involved with my diagnosis, and to reconsider the order of dismissal issued yesterday (D0039). I request one last extension to give me time to attempt service by mail.

In the alternative, I request the Court allow time for KIM REYNOLDS FOR IOWA to respond to my Notice of Intent to File an Application for Default mailed to the Treasurer, Committee Chairperson, and Candidate on Aug. 20. Iowa R. Civ. P. 1.977 allows for 60 days after a default is entered to show good cause for the Court to set aside a judgment. In the event the Defendant responds within this limitations period, that part of the suit may proceed.

I have done my best, in good faith, to adhere to the Iowa R. Civ. P. to the best of my

ability and knowledge.

### **Introduction**

1. Circumstances which caused my PTSD symptoms to trigger and flare up are described below. I am deeply concerned that my PTSD symptoms impaired my ability to adhere to the Iowa R. Civ. P. without flaw, which led to the error in service of process. Page 5 of **Attachment A – Aug. 16 Mental Health Assessment for Sondra Wilson**, states:

- “The severity of [Sondra's] functional impairments and PTSD symptoms as noted on this form could inhibit her ability to manage a typical academic workload”
- “[Sondra's] PTSD could be triggered by remarks made towards her by others in the class. At this stage in mental health treatment, it could be beneficial for [Sondra] to distance herself from that situation.”
- “[Sondra] has functional impairment concerns (e.g. concentration, sustained reading, impulse control).”
- “The severity of [Sondra's] functional impairments and PTSD symptoms as noted on this form could inhibit her ability to manage an academic workload in a timely manner.”

2. I had an extremely hectic and nerve wracking final semester (prior to graduating) while participating in DMACC's London Abroad program this spring. Besides my regular schoolwork:

- I documented at numerous locations throughout Europe in order to finish writing a history textbook. I was obligated to finish this book due to a contract I signed with my professor as part of DMACC's Honors programs.<sup>1</sup> Finishing this book was to be my primary focus while in London, however it was interrupted by multiple urgent deadlines pertaining to case # LACL157381, often referenced as “the adjacent case” throughout filings I've submitted for this case.<sup>2</sup> If I wasn't performing casework, I was frantically catching up on homework, my Honors project, and my fulfilling my

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1 **Attachment B – DMACC Honors Contract.**

2 Against the BUSINESS, NONPROFIT, and five tortfeasors referred to in Part 3 of my Amended Petition for this case. (D0030, ¶¶ 52 – 64).

obligation, as a Gilman Scholar,<sup>3</sup> to complete the Follow-On Service Project.<sup>4</sup>

- Although I possess numerous pieces of evidence which prove the defendants in case # LACL157381 defamed and performed predatory fraud against me in retaliation for filing a discrimination complaint with the Iowa Civil Rights Commission, instead of coming to the table the defendants submitted multiple lengthy filings while I was overseas. Their filings contained false counter-accusations and requests to the Court to assign their attorney's fees to me.<sup>5</sup> Instead of being able to focus on my schoolwork, I had to respond to each of their lengthy, aggressive motions within the 10 day time limit Iowa R. Civ. P. 1.431. I am *very* thankful my professors provided me homework extensions because they knew what had happened to me and what was at stake. My PTSD became severely triggered by the fear the defendants were entering into me.
- On March 15 I moved to continue case # LACL157381 until after the semester ended, and requested Judge Gronewald recuse herself case for similar reasons I requested her to recuse from this one.<sup>6</sup> She was appointed by Kim Reynolds, a named tortfeasor within *this* suit. I was very concerned, based on the rights violations and defamation by Kim Reynolds against transgender Iowans, and rights violations by Republican legislators, that Judge Gronewald would under no circumstances rule in my favor. Judge Gronewald indicated my suspicions were true because on the same day I filed the motion, March 15, she denied my motion to recuse and simultaneously granted the defendants' motion to transfer venue<sup>7</sup> even though:
  - She was “disqualified” from granting the defendants' motion according to Iowa Code. Jud. Cond. 51:2.11; and
  - I had shown good cause not to transfer the case to Story County.
- On April 2 I filed a motion for Judge Gronewald to reconsider her order not to recuse, and her order granting the defendants' motion to transfer venue while having been

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3 **Attachment C – Gilman Scholar Certificate of Achievement.**

4 “Follow-on Service Project.” *Benjamin A. Gilman International Scholarship*, 8 Sept. 2023, [www.gilmanscholarship.org/alumni/follow-on-service-project/](http://www.gilmanscholarship.org/alumni/follow-on-service-project/).

5 Although the defendants did not file a counterclaim per se, they do appear to be attempting to set up a retaliatory lawsuit to punish me for coming forward. I am awaiting a decision from our Aug. 12 hearing, and am hopeful that case is not dismissed and will instead move forward.

6 **Attachment D – motion to recuse and motion to continue for case #LACL157381.**

7 **Attachment E – Judge Gronewald denial of recusal and granting of defendants' motion.**

disqualified from doing so.<sup>8</sup> That same day, April 2, Judge Gronewald denied these motions as well,<sup>9</sup> again indicating bias.

- Immediately following Judge Gronewald's denial of my motion to recuse and simultaneous granting of the defendants' motion, the defendants for case #LACL157381, emboldened by Judge Gronewald's apparent bias, filed a motion to enlarge her order and assign their attorney's fees to me (thus reiterating this request they had made within their previous filing). This brought me great anxiety and fear because they were attempting to cause additional harm after having already performed predatory actions against me for which I was suing. The defendants also adamantly resisted my motion to continue that case until after my semester was over, urging the Court to unfairly continue pressuring me.

3. After returning to Iowa in April and graduating early May, I hit the ground running, picking up both cases where I had left off. For this case that meant attempting service. After Deputy Adamovics filed notice to the court that he was unable to serve the only addresses we knew of where we might be able to attempt service (D0003, D0004, D0005), Judge Gronewald issued an order (D0007) that service must be made within 30 days. From that point forward, I was not only in need to urgently respond to the State's May 22 motion to dismiss (D0009), but also to the motions the defendants were filing in case # LACL157381.<sup>10</sup>

4. On May 28 I filed a motion for Judge Gronewald to recuse herself from this case and to grant a continuance until after case # LACL157381 was finished because I was feeling overwhelmed and unable to keep up, and because the outcome of that case could directly impact and help decide this case (D0011). On July 7 Judge Gronewald denied my continuance (D0013).

5. Following the July 14 hearing, on July 19 Judge Gronewald denied my motion to recuse. This further activated my PTSD symptoms, leaving me feeling intimidated, fearful, and

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8 Attachment F – motion to reconsider unjust orders for case # LACL157381.

9 Attachment G – Judge Gronewald's second set of unjust orders for case # LACL157381.

10 I have not attached defendants' motions for case # LACL157381, but can do so if the Court would like to see this evidence.

very stressed, causing me functional impairments including inability to concentrate. I had reasonable cause to be terrified that Judge Gronewald was bias and refusing to step down in order to protect fellow Republicans and the Governor who appointed her from a suit filed by a transsexual who was harmed by a bill they passed, and by defamatory statements she has made.

6. Following my motion to reconsider her order not to recuse (D0022), I felt greatly relieved on July 9 when Judge Gronewald stepped down (D0025). I do not know her personally, but I do know that I was severely harmed by her Republican colleagues who severely harmed me and who are actively conspiring to continue to do so.<sup>11</sup> Due to the nature of the conspiracy I alleged in my Amended Petition, it was reasonable for me to suspect her bias and motive for not recusing previously.

7. I also felt relief following our Aug. 9 hearing. It appeared to the courtroom witnesses I heard from afterward, that you seemed genuinely concerned, Your Honor. This also seemed apparent to me, and made me much more at ease than at July 14 hearing.

8. I am calmer and more relaxed now that the primary filings for both this case and case # LACL157381 have been filed (so I am not swamped with overlapping deadlines). I have also begun to wrap my head around the Iowa R. Civ. P. better than previously, albeit I am sure to make some errors for which again I request grace from the Court.

9. Yesterday, while reading your order to dismiss (D0039), Your Honor, I noticed something I did not read properly within Judge Gronewald's June 19 order (D0021) – that the deadline for service upon KIM REYNOLDS FOR IOWA was set for August 1. I mistakenly thought “July 1” after I read it, which is why I filed the “Notice of Necessity to Serve by

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<sup>11</sup> See PART FOUR of my Amended Petition (D0030).

Publication” on July 1 instead of Aug. 1. I strongly suspect that my PTSD symptoms caused me such panic during that time, for all the aforementioned reasons, that my ability to concentrate and perform sustained reading, which are both listed as severe impairments within my Mental Health Assessment (**Attachment A**), caused me to:

- Misread Judge Gronewald's June 19 order; and
- Overlook or misunderstand the part about “service by mail” within Iowa R. Civ. P. 1.442(2). While the rules are complex, I believe my symptoms complicated this matter.

**Final request for extension of time for service of process to KIM REYNOLDS FOR IOWA**

10. Your Honor, I respectfully request, in light of what I have presented her and within my motion to reconsider order filed yesterday, to show me mercy and extend my deadline to allow time for service by mail. In the alternative, I request the Court allow time for KIM REYNOLDS FOR IOWA to respond to the Notice of Intent to File an Application for Default that I mailed to registered addresses of the campaign committee's Treasurer (Angie Hughes), Committee Chairperson (Linda Juckette), and Candidate (Kim Reynolds on Aug. 20. Iowa R. Civ. P. 1.977 allows for 60 days after a default is entered to show good cause for the Court to set aside a judgment. In the event the Defendant responds within this limitations period, I would then request to serve Original Notice and copies of all subsequent filings to the defendant via whichever manner the defendant deems appropriate.

Thank you for your consideration with this matter, Your Honor. I apologize for any inconvenience inadvertently caused to the Court or to any party involved.

Dated: 8/22/2024

    /s/ Sondra Wilson    

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Kim Reynolds for Iowa – *awaiting response prior to service*

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#### 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 USPS or by email asap. I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sondra Wilson