

IN THE IOWA DISTRICT COURT IN AND FOR STORY COUNTY

ALEXANDRA “SONDRA” WILSON,)	
)	CASE NO. LACV053674
<i>Plaintiff,</i>)	
)	
v.)	
)	
RELIABLE STREET INC, LOCKWOOD)	
CAFE, LYND SAY NISSEN, SHARON)	
STEWART, WILLA COLVILLE, DENISE)	
MARTINEZ, and CHARLIE ESKER)	
)	
<i>Defendants</i>)	
_____)	

PLAINTIFF’S MOTION TO CONTINUE TRIAL, EXTEND DISCOVERY AND PRETRIAL DEADLINES, DEFER SUMMARY JUDGMENT UNTIL DISCOVERY IS COMPLETED, AND REQUEST STATUS CONFERENCE

COMES NOW Plaintiff Alexandra “Sondra” Wilson, appearing pro se, and respectfully moves the Court to continue the August 4, 2026 trial date, extend discovery and pretrial deadlines, defer ruling on Defendants’ motion for summary judgment until necessary discovery is completed, and set a status conference or enter a revised scheduling order. In support, Plaintiff states as follows:

I. INTRODUCTION

1. Plaintiff does not seek delay for delay’s sake. Plaintiff seeks a fair opportunity to make the case trial-ready.

2. Trial is presently scheduled for August 4, 2026. Multiple matters directly affecting the trial posture of this case remain pending, including Defendants’ Motion for Summary Judgment (D0089), Defendants’ Statement of Material Facts and Memorandum in Support (D0090), Plaintiff’s Motion to Compel Discovery (D0091), and Plaintiff’s renewed motion for leave to file the Revised Second Amended Petition.

3. Plaintiff timely served written discovery on March 2, 2026. Defendants objected and produced no responsive documents. Plaintiff filed a motion to compel on April 14, 2026. The Court held a hearing on May 26, 2026, but no ruling has issued.

4. Defendants seek summary judgment while discovery remains unresolved and before Plaintiff has received discovery directly relevant to authorship, preparation, transmission, chronology, reliance, republication, truth or falsity, damages, and the scope of any asserted privilege.

5. Without a continuance and revised schedule, Plaintiff will be required to prepare for trial, disclose and secure witnesses, exchange exhibits, respond to dispositive issues, and litigate disputed factual questions without the discovery necessary to fairly do so.

II. PROCEDURAL BACKGROUND

6. Trial is currently set for August 4, 2026.

7. The Trial Scheduling and Discovery Plan requires written discovery to be served no later than 90 days before trial and depositions to be completed no later than 60 days before trial. The Plan also requires pretrial witness and exhibit disclosures before trial and states that continuances are governed by Iowa Rule of Civil Procedure 1.910 and will be granted only for good cause.

8. The parties' discovery plan also recognized that electronically stored information may be relevant and preserved the right to request native format or metadata where relevance, authenticity, or completeness is at issue and supported by good cause.

9. Plaintiff timely served her First Set of Discovery Requests on March 2, 2026, before the written-discovery deadline.

10. Plaintiff's First Set of Discovery Requests sought targeted discovery concerning the

June 28, 2022 Iowa Civil Rights Commission submission, including draft and final versions, native electronic files, metadata, communications concerning preparation and transmission, and identification of persons involved in creating, editing, formatting, compiling, revising, altering, reviewing, approving, or submitting the materials.

11. Defendants objected to those discovery requests and produced no responsive documents.

12. Defendants nevertheless provided interrogatory answers admitting that the June 28, 2022 ICRC submission was created, edited, formatted, compiled, and revised by Sharon Stewart and Lyndsay Nissen; that Sharon Stewart authored the header language at issue; and that the submission was emailed to the ICRC on June 27, 2022.

13. Defendants also asserted objections based on relevance, burden, work product, privilege, and the position that the ICRC submission “speaks for itself.” Defendants did not produce the requested drafts, native files, metadata, transmission records, communications, or a privilege log sufficient to evaluate withheld materials.

14. On April 6, 2026, Defendants filed their Motion for Summary Judgment (D0089) and Statement of Material Facts and Memorandum of Authorities (D0090), seeking judgment based on absolute privilege, conditional privilege, truth, and damages.

15. On April 14, 2026, Plaintiff filed Plaintiff’s Resistance to Motion for Summary Judgment, Motion to Compel Discovery, and Motion to Clarify Operative Pleading (D0091).

16. The Court held a hearing on May 26, 2026. No ruling has issued on Defendants’ summary-judgment motion, Plaintiff’s motion to compel, or the unresolved pleading issues.

III. GOOD CAUSE EXISTS TO CONTINUE TRIAL AND EXTEND DEADLINES

17. Good cause exists because the case is not in a trial-ready posture.

18. Plaintiff timely sought discovery. Defendants objected and produced no responsive documents. Plaintiff's motion to compel remains pending. Defendants seek summary judgment before producing discovery central to the disputed factual record. Trial is approaching. Pretrial deadlines are also approaching.

19. The written-discovery deadline should not bar the relief requested here. Plaintiff timely served her First Set of Discovery Requests on March 2, 2026, Defendants produced no responsive documents, Plaintiff's motion to compel remains pending, and discovery has not been stayed by order of the Court. Plaintiff therefore seeks a revised schedule not to reopen completed discovery, but to complete discovery that was timely sought and remains unresolved.

20. The withheld discovery is not peripheral. It goes directly to authorship, preparation, editing, compilation, formatting, sequencing, transmission, chronology, administrative reliance, republication, truth or falsity, damages, and the scope of any asserted privilege.

21. Defendants' summary-judgment motion places these issues directly before the Court. Defendants argue absolute privilege, conditional privilege, truth, lack of malice, and lack of damages. Plaintiff cannot fairly respond to those arguments or prepare for trial without discovery concerning who prepared the submissions, how the submissions were assembled, what communications occurred, what drafts or metadata exist, what was transmitted to ICRC, and whether Defendants' presentation accurately reflected the underlying communications.

22. Defendants have specifically placed truth at issue by arguing in their summary-judgment motion that the challenged statements were true. Plaintiff's timely discovery requests are directly related to testing that defense. Drafts, native files, metadata, communications, transmission records, source materials, and sequencing information are necessary to determine

whether Defendants' submissions accurately reflected the underlying communications, whether the materials were selectively excerpted or presented out of context, whether chronology or formatting affected the apparent meaning of the submissions, and whether Defendants knew or had reason to know that the challenged allegations were false, misleading, incomplete, or materially out of context.

23. Plaintiff has also filed a renewed motion for leave to file a Revised Second Amended Petition, together with organized exhibits, which identify factual disputes concerning the truth, context, chronology, completeness, and presentation of Defendants' administrative submissions. Those disputes further demonstrate why discovery is necessary before summary judgment or trial.

24. Plaintiff needs a revised schedule to prepare and disclose trial witnesses and exhibits in an orderly manner. Plaintiff anticipates calling witnesses with knowledge of Plaintiff's work, community involvement, reputation, damages, and the factual circumstances surrounding the disputed allegations and their effects. Plaintiff cannot responsibly finalize witness and exhibit disclosures while discovery remains unresolved and while Defendants continue to withhold documents directly bearing on the disputed factual record.

25. Plaintiff further anticipates that depositions, if necessary, cannot be meaningfully prepared or conducted until Defendants produce the underlying documents and communications responsive to Plaintiff's timely written discovery.

26. A continuance will not unfairly prejudice Defendants. Defendants have been aware since March 2, 2026, of the discovery Plaintiff seeks. Defendants objected rather than producing documents. The prejudice instead falls on Plaintiff if trial proceeds while discovery remains unresolved and Defendants' dispositive motion remains pending.

IV. SUMMARY JUDGMENT SHOULD BE DEFERRED UNTIL DISCOVERY IS COMPLETED

27. Iowa Rule of Civil Procedure 1.981(6) permits the Court to refuse summary judgment, continue the matter, allow discovery to be had, or make another just order when the resisting party shows by affidavit that, for stated reasons, she cannot present facts essential to justify opposition. Iowa courts recognize that this rule provides relief where a party legitimately needs additional time to gather facts essential to resist summary judgment, provided the party identifies the facts sought, why they are material, what efforts were made to obtain them, and why those efforts were unsuccessful. See *Bitner v. Ottumwa Community School District*, 549 N.W.2d 295, 301–02 (Iowa 1996).

28. Plaintiff has identified specific discovery needed to respond to Defendants' summary-judgment motion, including drafts, native files, metadata, communications, transmission records, authorship information, review/approval information, and materials showing how the ICRC submissions were assembled, selected, framed, transmitted, relied upon, repeated, or republished.

29. This discovery is essential because Defendants' motion asks the Court to resolve privilege, conditional privilege, truth, malice, damages, publication, republication, and the legal effect of Defendants' ICRC submissions before Plaintiff has received the documents and information necessary to test those issues.

30. Defendants should not be permitted to rely on the absence of evidence while simultaneously withholding discovery relevant to that evidence. Nor should Defendants be permitted to withhold discovery, seek summary judgment before production, and then oppose a revised schedule on the ground that targeted follow-up discovery is untimely. Plaintiff seeks only a fair opportunity to complete discovery and prepare this case for trial.

V. REQUEST FOR STATUS CONFERENCE AND REVISED SCHEDULE

31. Plaintiff respectfully requests that the Court set a status conference to address the pending motion to compel, pending summary-judgment motion, pending pleading issues, the August 4 trial date, and a revised schedule for discovery, depositions, witness and exhibit disclosures, dispositive issues, and trial.

32. Plaintiff further requests that the Court extend discovery deadlines and permit targeted discovery necessary to prepare the case for trial and respond to dispositive issues.

33. Plaintiff does not ask the Court in this motion to decide the merits of Plaintiff's Second Set of Discovery Requests served June 24, 2026, except to the extent the Court extends deadlines and permits targeted follow-up discovery as part of a revised scheduling order. The Second Set is not intended to duplicate Plaintiff's timely First Set. It seeks targeted ESI-related information, search-method documentation, preservation information, withholding or privilege-log information, and communications concerning truth, accuracy, chronology, authorship, and completeness that Defendants have not produced. Plaintiff served those requests because discovery remains unresolved and trial remains scheduled, but acknowledges that Defendants have taken the position that additional written discovery requires Court approval or an amended schedule.

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Continue the August 4, 2026 trial date;
- B. Extend discovery and pretrial deadlines;
- C. Rule on, or set a hearing regarding, Plaintiff's pending motion to compel discovery (D0091);
- D. Defer ruling on Defendants' Motion for Summary Judgment (D0089) until Plaintiff has obtained discovery necessary to respond to the issues raised;
- E. Permit targeted follow-up discovery, including discovery concerning electronically

stored information, communications, metadata, preservation, search methods, authorship, preparation, transmission, chronology, reliance, republication, truth or falsity, damages, and privilege;

F. Set a status conference;

G. Enter a revised scheduling order; and

H. Grant any other relief the Court deems just and appropriate.

VI. DECLARATION OF ALEXANDRA “SONDRA” WILSON

I, Alexandra “Sondra” Wilson, declare under penalty of perjury as follows:

1. I am the Plaintiff in this action and am appearing pro se.
2. Trial is presently scheduled for August 4, 2026.
3. On March 2, 2026, I timely served Plaintiff’s First Set of Discovery Requests.
4. The discovery I served sought materials concerning the June 28, 2022 Iowa Civil Rights Commission submission, including draft and final versions, native files, metadata, communications concerning preparation and transmission, and identification of persons involved in creating, editing, formatting, compiling, revising, altering, reviewing, approving, or submitting those materials.
5. Defendants objected and produced no responsive documents.
6. On April 14, 2026, I filed a motion to compel discovery, docketed as D0091.
7. Defendants filed a motion for summary judgment on April 6, 2026, docketed as D0089, and a statement of material facts and memorandum in support, docketed as D0090.
8. The Court held a hearing on May 26, 2026. As of the date of this declaration, no ruling has issued on the motion to compel, Defendants’ motion for summary judgment, or the unresolved pleading issues.
9. I cannot fully present facts essential to justify my opposition to summary judgment or prepare this case for trial without the discovery requested.
10. The discovery sought is necessary to determine authorship, preparation, editing, compilation, formatting, sequencing, transmission, chronology, administrative reliance, republication, truth or falsity, damages, and the scope of any asserted privilege.
11. Defendants’ summary-judgment motion asserts truth as a defense. The discovery I seek is

necessary to test the truth, accuracy, completeness, context, sequencing, authorship, and presentation of the challenged ICRC submissions.

12. I also need a revised schedule to prepare and disclose trial witnesses and exhibits in an orderly manner.

13. I do not seek delay for delay's sake. I seek a fair opportunity to complete discovery, prepare witnesses and exhibits, respond to dispositive issues, and make the case trial-ready.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 6/24/2026

/s/ **Alexandra "Sondra" Wilson** _____
Alexandra "Sondra" Wilson

Respectfully submitted,

Dated: 6/24/2026 /s/ **Sondra Wilson** _____

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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 above at the addresses indicated on EDMS by transmitting a copy through EDMS and/or email no later than 6/24/2026. I declare under penalty of perjury that the foregoing is true and correct.

/s/ **Sondra Wilson** _____