

IN THE IOWA DISTRICT COURT IN AND FOR STORY COUNTY

ALEXANDRA “SONDRA” WILSON,	)	
<i>Plaintiff,</i>	)	CASE NO. LACV053674
	)	
v.	)	
	)	
RELIABLE STREET INC, LOCKWOOD	)	
CAFE, LOVE CLUB LLC, LYNDSEY	)	
NISSEN, SHARON STEWART, WILLA	)	PLAINTIFF’S MOTION FOR LEAVE TO
COLVILLE, DENISE MARTINEZ,	)	FILE SECOND AMENDED PETITION
and CHARLIE ESKER	)	
<i>Defendants</i>	)	
_____	)	

COMES NOW Plaintiff Alexandra “Sondra” Wilson (“Plaintiff”), appearing pro se, and pursuant to Iowa Rule of Civil Procedure 1.402(4), respectfully moves this Court for leave to file the attached **Second Amended Petition**, submitted contemporaneously herewith. In support of this Motion, Plaintiff states as follows:

I. INTRODUCTION AND RELIEF REQUESTED:

1. Plaintiff seeks leave to file a Second Amended Petition to correct procedural deficiencies identified by the Court in its October 4, 2024 Order Granting in Part and Denying in Part Defendants’ Motion to Dismiss, to attach and incorporate documentary exhibits previously referenced but not before the Court, and to clarify the factual and legal bases of Plaintiff’s surviving and newly pled claims.

2. This Motion does not seek reconsideration of claims dismissed with prejudice, nor does it attempt to relitigate claims expressly barred by the Court’s prior ruling. Rather, Plaintiff

seeks leave to present a complete, properly supported amended pleading consistent with the Court's guidance and the procedural posture preserved by subsequent orders.

3. Nothing in this Motion or the attached Second Amended Petition is intended to waive Plaintiff's ability to seek appropriate review of prior interlocutory orders or rulings through motions authorized by rule or on appeal from a final judgment.

II. PROCEDURAL BACKGROUND:

4. Plaintiff filed an Amended Petition on June 17, 2024.

5. On October 4, 2024, the Court entered an Order granting Defendants' Motion to Dismiss in part and denying it in part. In that Order, the Court expressly stated that it did not consider exhibits referenced by Plaintiff because they were not physically attached to the pleading, and dismissed several claims without the benefit of reviewing the contemporaneous communications and administrative records underlying those claims.

6. The Court's ruling preserved Plaintiff's ability to seek corrective relief through amendment, and the case thereafter entered a period of court-supervised settlement discussions during which deadlines were stayed.

7. Following the conclusion of settlement efforts without resolution, the Court issued a January 13, 2025 Order expressly authorizing amendment, and Plaintiff now files this Motion and the attached Second Amended Petition pursuant to that authorization.

III. LEGAL STANDARD:

8. Iowa Rule of Civil Procedure 1.402(4) provides that leave to amend "shall be freely given when justice so requires." Iowa courts favor amendment where it serves to clarify issues,

cure pleading defects, or encourage adjudication on the merits, absent undue delay, bad faith, repeated failure to cure deficiencies, or undue prejudice to the opposing party.

9. None of those disqualifying factors is present here.

IV. BASIS FOR AMENDMENT:

A. The Amendment Directly Responds to the Court's October 4, 2024 Order

10. The Court's October 4 Order made clear that several claims were dismissed without consideration of the documentary materials Plaintiff referenced but had not physically attached to the pleading. The attached Second Amended Petition corrects that defect by:

- Attaching and incorporating by reference the full administrative record and contemporaneous communications (Exhibits A–G);
- Pleading ultimate facts rather than anticipated proof;
- Clarifying which claims survive independently of those dismissed with prejudice; and
- Reframing Plaintiff's allegations to reflect the role of administrative and judicial processes in the alleged misconduct.

11. This amendment therefore implements the Court's expressed evidentiary and pleading concerns, rather than attempting to circumvent them.

B. Plaintiff Does Not Seek to Revive Claims Dismissed With Prejudice

12. Plaintiff expressly acknowledges and respects the Court's dismissal with prejudice of certain claims. The Second Amended Petition does not reassert those claims in barred form, but instead pleads distinct causes of action arising from:

- Defendants' post-complaint conduct;
- The institutionalization of defamatory allegations in administrative and judicial records;
- Retaliation and abuse of process occurring after Plaintiff engaged in protected activity; and
- Continuing and prospective harms not adjudicated in the prior dismissal.

13. The amendment is thus legally constrained by the Court's prior ruling and tailored accordingly.

C. The Timing of the Amendment Is Justified and Not Dilatory

14. The timing of this Motion is not the product of strategic delay. Following the Court's October 4, 2024 ruling, the case entered court-supervised settlement proceedings, deadlines were stayed, and subsequent procedural developments required Plaintiff to prioritize compliance with court orders and responsive filings, including court-authorized extensions, responsive filings, and overlapping procedural obligations. Once Plaintiff was able to comply fully with procedural requirements and present a complete, properly supported amended pleading, she did so promptly.

D. Defendants Will Not Be Unduly Prejudiced

15. Defendants have long been in possession of the exhibits attached to the Second Amended Petition, a substantial portion of which originated from Defendants themselves and

were submitted by them to the Iowa Civil Rights Commission. The amendment does not introduce surprise evidence or novel factual theories, but instead organizes and formally attaches materials already central to the dispute.

16. Any additional motion practice required will be proportional and consistent with adjudication on the merits.

V. INTEREST OF JUSTICE:

17. This case involves allegations of reputational harm arising from unadjudicated accusations embedded in public administrative and judicial records. Where such allegations continue to impose professional, civic, and personal harm, justice favors resolution on a complete evidentiary record rather than dismissal based on procedural incompleteness.

18. Granting leave to amend will promote judicial economy, clarify the issues for adjudication, and ensure that the Court's prior rulings are applied in a procedurally sound posture.

19. The Second Amended Petition does not expand the factual universe of the case, but consolidates, organizes, and attaches the materials already central to the dispute so that the claims may be evaluated on their merits.

VI. CONCLUSION:

20. For the foregoing reasons, Plaintiff respectfully requests that the Court grant leave to file the attached Second Amended Petition.

PROPOSED ORDER

IT IS ORDERED that Plaintiff's Motion for Leave to File Second Amended Petition is **GRANTED**, and the Second Amended Petition submitted contemporaneously with this Motion is deemed filed as of the date of this Order.

Executed on this 6th day of January, 2026.

/s/ Alexandra "Sondra" Wilson
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CERTIFICATE OF SERVICE

I certify that on January 6, 2026, a true and correct copy of this document was served upon all counsel of record via the Iowa Judicial Branch Electronic Document Management System (EDMS/eFile Iowa).

/s/ Alexandra "Sondra" Wilson
Alexandra "Sondra" Wilson

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