APPENDIX

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APPENDIX A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

Alan Headman, Plaintiff

v.

Royal I. Hansen, et al., Defendants

Docket No. 2:19-cv-592
2:19-cv-961 (consolidated)
2:19-cv-016 (consolidated)

JUDGEMENT IN A CIVIL CASE
MEMORANDUM DECISION AND ORDER

Date of Entry: March 09, 2020

Before: Judge Dee Benson, District Judge and Judge Evelyn J. Furse Magistrate Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

ALAN HEADMAN, Plaintiff, v. ROYAL I. HANSEN, et al., Defendants.	**JUDGMENT IN A CIVIL CASE** Case No. 2:19-cv-592 Case No. 2:19-cv-961 (consolidated) Case No. 2:20-cv-16 (consolidated) District Judge Dee Benson Magistrate Judge Evelyn J. Furse

It is ORDERED AND ADJUDGED that Defendants' Motion to Dismiss is granted and the action is dismissed with prejudice. All other pending motions in this case (Dkt. Nos. 15, 26, 45, 47) are dismissed.

DATED this 9th day of March, 2020.

BY THE COURT:

Dee Benson
United States District Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

ALAN HEADMAN, Plaintiff, v. ROYAL I. HANSEN, et al., Defendants.	**MEMORANDUM DECISION AND ORDER** Case No. 2:19-cv-592 Case No. 2:19-cv-961 (consolidated) Case No. 2:20-cv-16 (consolidated) District Judge Dee Benson Magistrate Judge Evelyn J. Furse

Before the court is Defendants' Motion to Dismiss for Failure to State a Claim. (Dkt. No. 43.) The court has reviewed the facts and arguments set forth in the parties' filings. Pursuant to civil rule 7-1(f) of the United States District Court for the District of Utah Rules of Practice, the court elects to determine the motion on the basis of the written memoranda and finds that oral argument would not be helpful or necessary. DUCivR 7-1(f).

DISCUSSION

This case centers on Plaintiff Alan Headman's treatment in his state court divorce case. Mr. Headman claims his due process rights were violated. He claims his right to a jury trial was violated. He claims the judge was wrong to deny his request for a reduction in alimony. He declares that this federal court action does not seek to change the rulings that were adverse to him in his divorce case, but rather to remedy his rights to due process and a jury trial. He seeks to achieve this remedy by obtaining from this court various injunctions and declarations fixing what he feels is wrong with the state court system. He also asks for general and punitive damages. In his endeavor to obtain this relief, Mr. Headman has sued Judge Royal I. Hansen, his trial judge (Dkt. No. 1), Commissioner Joanna Sagers, who made recommendations to the court regarding

alimony and other matters (Dkt. No. 1, Case No. 2:19-cv-961 (consolidated)), and all five justices of the Utah Supreme Court: Chief Justice Matthew B. Durrant, Associate Chief Justice Thomas R. Lee, Justice Constandinos Himonas, Justice John A. Pierce, and Justice Paige Petersen. (Dkt. No. 1, Case No. 2:20-cv-16 (consolidated).)

Initially, Mr. Headman sought injunctive relief by filing a Motion for a Temporary Restraining Order asking this court to enjoin Defendants "from incarcerating the Plaintiff until he receives his due process by a Trial by Jury upon all motions." (Dkt. No. 31 at 4.) That motion was denied on January 17, 2020 for, among other things, being virtually devoid of supporting facts that could entitle him to the relief he sought or to justify the jurisdiction of this court. (*See* Dkt. No. 34.)

Currently before the court is Defendants' Motion to Dismiss all of the consolidated cases for various reasons, including judicial immunity, failing to comply with Rule 8 of the Federal Rules of Civil Procedure, the *Rooker-Feldman* doctrine, and the *Younger* abstention doctrine. (Dkt. No. 43.) Each of these grounds for dismissal are meritorious and effectively dispose of this litigation, as follows:

***Rooker-Feldman*:**

The *Rooker-Feldman* doctrine recognizes that "federal courts, other than the United States Supreme Court, lack jurisdiction to adjudicate claims seeking review of state court judgments." *Bisbee v. McCarty*, 3 F. App'x 819, 822 (10th Cir. 2001); *see also D.C. Court of Appeals v. Feldman*, 460 U.S. 462 (1983); *Rooker v. Fid. Tr. Co.*, 263 U.S. 413 (1923). Under this doctrine, "[t]he losing party in a state court proceeding is generally 'barred from seeking what in substance would be appellate review of the state court judgment in a United States district court, based on the losing party's claim that the state judgment itself violates the loser's

federal rights.'" *Bisbee,* 3 Fed. App'x at 822 (quoting *Johnson v. De Grandy*, 512 U.S. 997, 1005–06 (1994)).

***Younger* Abstention:**

The *Younger* abstention doctrine "dictates that federal courts not interfere with state court proceedings by granting equitable relief—such as injunctions of important state proceedings or declaratory judgments regarding constitutional issues in those proceedings—when such relief could adequately be sought before the state court." *Rienhardt v. Kelly*, 164 F.3d 1296, 1302 (10th Cir. 1999), *implied overruling on other grounds recognized by Dunlap v. Nielsen*, 771 F. App'x 846, 849 (10th Cir. 2019).

The *Rooker-Feldman* and *Younger* abstention doctrines bar this court from granting the relief sought by Mr. Headman. The state appellate process is the proper forum for Mr. Headman to seek relief from and request review of any judicial decisions that he believes are wrong in his divorce proceedings. While Mr. Headman is clearly unhappy with the outcome of his state court divorce case, "[u]nhappiness ... does not confer jurisdiction on this court." *Headman v. Utah,* No. 2:18-CV-00051, 2018 WL 4469843, at *2 (D. Utah July 2, 2018), *report and recommendation adopted,* No. 2:18-CV-51, 2018 WL 4469376 (D. Utah Sept. 17, 2018), *aff'd,* 770 F. App'x 435 (10th Cir. 2019).

Judicial Immunity:

Even without application of the *Rooker-Feldman* and *Younger* abstention doctrines, it is well-settled that judicial immunity protects judges from civil liability for judicial acts. *See, e.g., Mireles v. Waco,* 502 U.S. 9, 9–10 (1991). This immunity is absolute and is only overcome in two sets of circumstances: (1) where a suit is based on nonjudicial actions; and (2) where a suit is based on actions taken in the complete absence of all jurisdiction. *Id.* at 11–12. Such immunity is

vital to the judicial system because it allows a judicial officer "to act without apprehension of personal consequences" and without fear that he or she will face "[l]iability to answer to every one who might feel himself aggrieved by the action of the judge." *Bradley v. Fisher*, 80 U.S. 335, 347 (1871).

Each of the defendants in this case are shielded by this doctrine of judicial immunity. Judge Hansen's decisions to deny Mr. Headman's jury trial demand, hold a bench trial, and modify the divorce decree were all clearly judicial acts. Similarly, Mr. Headman's claims indicate that he is suing the justices of the Utah Supreme Court in their official capacities, rendering them immune under the Eleventh Amendment. Commissioner Sagers, as a court-appointed commissioner, is likewise immune for her actions described in the claims in this case because the Tenth Circuit extends judicial immunity to the actions of non-judicial officers "where their duties had an integral relationship with the judicial process." *Whitesel v. Sengenberger*, 222 F.3d 861, 867 (10th Cir. 2000). While Mr. Headman argues that the Defendants "do not have jurisdiction to ignore the protections of the Constitution," he has not alleged facts showing that any of the Defendants acted outside of their jurisdiction or judicial role when the events that Mr. Headman complains of occurred. (Dkt. No. 45 at 5–6.)

Federal Rule of Civil Procedure 8:

Rule 8 of the Federal Rules of Civil Procedure requires that a complaint contain "a short and plain statement of the claim showing that the pleader is entitled to relief." Fed. R. Civ. P. 8. While detailed factual allegations are not necessary under Rule 8, "[t]hreadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). If "the well-pleaded facts do not permit the court to infer more than the mere possibility of misconduct, [then] the complaint has alleged—but it has not

shown—that the pleader is entitled to relief." *Id.* at 679 (internal quotations and brackets omitted). In the case of a *pro se* complaint, the pleadings are entitled to "a liberal construction," but the litigant must still satisfy the requirements of Rule 8. *Whitehead v. Shafer*, 295 F. App'x 906, 908 (10th Cir. 2008). "Accordingly, a district court may dismiss a pro se complaint when, even liberally construed, it is incomprehensible." *Id.* (internal quotations and citation omitted).

Even if Mr. Headman's claims were not subject to dismissal under the doctrines of *Rooker-Feldman, Younger* abstention, and judicial immunity, Mr. Headman has failed to satisfy the pleading requirements of Rule 8. In order to state a plausible claim, Rule 8 "demands more than an unadorned, the defendant-unlawfully-harmed-me accusation ... [and] more than a sheer possibility that a defendant has acted unlawfully." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). The court has construed Mr. Headman's *pro se* pleadings liberally. Mr. Headman has nevertheless failed to state a plausible claim by failing to support his conclusory allegations with the requisite facts.

CONCLUSION

For the foregoing reasons, Defendants' Motion to Dismiss (Dkt. No. 43) is hereby GRANTED. Plaintiff's claims are DISMISSED with prejudice, and this action is CLOSED. All other pending motions in this case (Dkt. Nos. 15, 26, 45, 47) are also hereby DISMISSED as moot.

DATED this 9th day of March, 2020.

BY THE COURT:

Dee Benson
United States District Judge

APPENDIX B

UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT

Alan Headman, Plaintiff

v.

Royal I. Hansen, et al., Defendants

Docket No. 20-4035

ORDER AND JUDGEMENT

Date of Entry: August 10, 2020

Before: Judge Mary Beck Briscoe, Bobby R. Baldock, Joel M. Carson, Circuit Judges

FILED
United States Court of Appeal
Tenth Circuit

August 10, 2020

Christopher M. Wolpert
Clerk of Court

UNITED STATES COURT OF APPEALS

FOR THE TENTH CIRCUIT

ALAN HEADMAN,

Plaintiff - Appellant,

v.

ROYAL I. HANSEN,

Defendant - Appellee,

and

JOANNA SAGERS; MATTHEW B. DURRANT; THOMAS REX LEE; CONSTANTINOS HIMONAS; JOHN A. PIERCE; PAIGE PETERSEN,

Consolidated Defendants - Appellees.

No. 20-4035
(D.C. No. 2:19-CV-00592-DB)
(D. Utah)

ORDER AND JUDGMENT*

Before **BRISCOE**, **BALDOCK**, and **CARSON**, Circuit Judges.**

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* This order and judgment is not binding precedent, except under the doctrines of law of the case, res judicata, and collateral estoppel. It may be cited, however, for its persuasive value consistent with Fed. R. App. P. 32.1 and 10th Cir. R. 32.1.

** After examining the briefs and appellate record, this panel has determined unanimously that oral argument would not materially assist in the determination of this appeal. *See* Fed. R. App. P. 34(a)(2); 10th Cir. R. 34.1(G). The case is therefore ordered submitted without oral argument.

Plaintiff - Appellant Alan Headman filed three § 1983 actions in the United States District Court for the District of Utah: one against Judge Royal I. Hansen, the state court trial judge who presided over his divorce case; a second against Commissioner Joanna Sagers, who made recommendations to the court regarding alimony and other matters; and a third against all five justices of the Utah Supreme Court. The claims in each of the actions stemmed from Plaintiff's divorce proceedings in state court. The district court consolidated the actions, and thereafter, Defendants filed motions to dismiss. The district court granted the motions, concluding four separate grounds supported dismissal: (1) lack of jurisdiction under the *Rooker-Feldman* doctrine; (2) *Younger* abstention barred the relief Plaintiff sought; (3) Defendants are entitled to judicial immunity; and (4) Plaintiff failed to state a plausible claim for relief under Federal Rule of Civil Procedure 8. The district court therefore dismissed the consolidated action with prejudice.

Plaintiff now appeals the final judgment, asserting the district court erred in dismissing his claims. But Plaintiff fails to present any legally or factually adequate basis for reversal. In a well-reasoned order, the district court competently explained why Plaintiff's allegations—even under a liberal interpretation—fail to support any viable legal claim for relief. For the purpose of resolving this appeal, we have thoroughly reviewed the district court record, Plaintiff's appellate brief, and Defendants' response brief. We discern no reversible error. Where the district court accurately analyzes an issue, we see no useful purpose in writing at length. Therefore,

exercising jurisdiction under 28 U.S.C. § 1291, we AFFIRM for substantially the same reasons set forth in the district court's order dismissing Plaintiff's complaint.

Entered for the Court

Bobby R. Baldock
Circuit Judge

UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT
OFFICE OF THE CLERK
Byron White United States Courthouse
1823 Stout Street
Denver, Colorado 80257
(303) 844-3157

Christopher M. Wolpert
Clerk of Court

Jane K. Castro
Chief Deputy Clerk

August 10, 2020

Mr. Alan Headman
420 West Cadbury Drive, Unit E-204
South Jordan, UT 84095

Mr. J. Clifford Petersen
Office of the Attorney General for the State of Utah
Heber M. Wells Building Offices
P.O. Box 140811
Salt Lake City, UT 84114

RE: **20-4035, Headman v. Hansen**
Dist/Ag docket: 2:19-CV-00592-DB

Dear Counsel and Appellant:

Enclosed is a copy of the order and judgment issued today in this matter. The court has entered judgment on the docket pursuant to Fed. R. App. P. Rule 36.

Please contact this office if you have questions.

Sincerely,

Christopher M. Wolpert
Clerk of the Court

CMW/klp

APPENDIX C

UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT

Alan Headman, Plaintiff

v.

Royal I. Hansen, et al., Defendants

Docket No. 20-4035

APPEAL MANDATE NOTICE

Date of Entry: September 1, 2020

Issued by: Christopher M. Wolpert, Clerk of the Court

UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT
OFFICE OF THE CLERK
Byron White United States Courthouse
1823 Stout Street
Denver, Colorado 80257
(303) 844-3157

Christopher M. Wolpert
Clerk of Court

Jane K. Castro
Chief Deputy Clerk

September 01, 2020

Mr. D. Mark Jones
United States District Court for the District of Utah
351 South West Temple
Salt Lake City, UT 84101

RE: **20-4035, Headman v. Hansen**
Dist/Ag docket: 2:19-CV-00592-DB

Dear Clerk:

Pursuant to Federal Rule of Appellate Procedure 41, the Tenth Circuit's mandate in the above-referenced appeal issued today. The court's August 10, 2020 judgment takes effect this date.

Please contact this office if you have questions.

Sincerely,

Christopher M. Wolpert
Clerk of the Court

cc: Alan Headman
J. Clifford Petersen

CMW/jm

APPENDIX D

Summary of Utah's Systemic Denial of Due Process over Involuntary Servitude

The imposition of Involuntary Servitude within alimony is systemically entwined throughout Utah Courts at every level. Although, NOT TO INVOKE FEDERAL INTERVENTION INTO ANYTHING OTHER THAT TO ADDRESS THE UNCONSTITUTIONALITY OF THE UTAH FORUM, the details of the Petitioner's case provides clear reference evidence of the Systemic injustice administered by Utah's inadequate forum.

Attorney Level – From the very start it was clear that the Petitioner had no advocate who respected the protection of laws which clearly applied to his case. The Petitioner's own attorney, who was supposed to fight for his rights, was clearly aware of the Courts coercive position requiring her to not even disclose facts that would require an interpretation, or documented denial, of fault law protection or lack of written concession to any level of servitude. The coercion by Utah Courts is therefore not only upon the victims who are forced into alimony payments but is also forced upon attorneys who have to practice before Utah's judicial body. The underlying threat is that if a Utah attorney does not cooperate with the Utah court in the current case the future cases for that attorney may not turn out favorable.

Commissioner Level – The denial of due process by Utah Judges is facilitated by a division of injustice between the Judge and the Commissioner. In the Petitioner's case, although the Petitioner's 50% decline in income was well documented to the Commissioner, the Judge did not like, among other things, the Petitioner's motion for declaratory judgement over how the Courts discriminated on who qualifies for fault-law protection or the motion for declaratory judgement to declare the standards for what constitutes fraud upon the Court by attorneys who fail to disclose material facts in a case. Therefore, the Judge ruled that the 50% decline in income was not a material change in circumstance and the commissioner issued the order to incarcerate the Petitioner for not meeting alimony payments. Both could point to the other for the injustice but neither were upholding their Constitutional oath.

Judge Level – Along with sharing of injustices with the Commissioner, the Judge engaged in deception in court proceeding as he said the declaratory judgement matters and motions regarding fault and fraud upon the court would not be heard at that time but he ruled against them as if the trial had occurred immediately after. This is after he dismissed witnesses, denied the presentation of evidence that the Petitioner came prepared with and did not otherwise facilitate the trial, and related demand for trial by jury, which was on the docket.

Appeal-Court Level – The Utah appeal court placed, or left matters, in a red-tape stalemate. The appeal court refused to process appeals over issues of fault and fraud upon the court which were before it claiming the lower courts orders were not final based on insignificant details. Despite multiple attempts seeking extraordinary resolution of the stalemate (through a writ of Mandamus and motion for new trial etc.) the appeal court continues to refuses to serve the interests of justice despite clear and convincing evidence that the case has merit. This fits with

the underlying fact that addressing the denial of due process does not meet the Courts agenda to place and keep citizens bound in Involuntary Servitude.

Supreme-Court Level – As part of the actions that have lead up to this plea to the Supreme Court of the Land, the Petitioner has sued the Utah Supreme Court Justices to remedy the denial of due process that is fitting the unconstitutional Utah agenda. Rather than simply remedying the situation by ordering the restoration of due process through a retrial, the Utah Supreme Court Justices are relying upon the fact that they enjoy Judicial Immunity and can deny any citizen of Life, Liberty or Property without recourse or consequence.

Federal District Court Justices Coming From Utah Courts – The majority of Federal Judges who serve in the Federal District Court in Utah come from Utah Courts or have strong affiliations with Utah through residency, religion or culture. The "Old Boy" network seems to carry forward to the Federal Forum where the practice of silencing of any who attempt to legally seek Constitutional protection against Involuntary Servitude, due process and protection of law continues.

In doing so, the Federal Courts are endorsing the states unconstitutionally "Systemic" practices including red-tape exhaustion, unnecessary delays, failing to enforce court rules of procedure by one party supported by documented evidence while enforcing rules of procedure on another party based upon hearsay or unsupported claims, endorsing false claims that relief cannot be granted under valid Constitutional claims, coercive fines, incarceration, threats of incarceration, false labels (such as vexatious), failure to protect rights in the first instance, placing the interests of guilty court officers before rights of citizens and other similar practices. In this respect, the initial Federal forum at the district and appeal level, which is supposed to be the check and balance to a faulty State system's protection of rights, has also failed to place the Life, Liberty and Property of the Citizens as priority over conflicting state interests and judicial immunity.

After approximately four years of litigation, thousands of pages of court filings, a well documented 50% decline in income without relief, opposing party concessions that the 50% decline in income is a material change in circumstances, the ignorance of compelling evidence supporting claims of fraud upon the court, and other items that should easily result in full due process of law, the Respondents have allowed multiple orders incarcerating the Petitioner (who has never been convicted of any crime), have imposed fines and attorney fees, has denied a duly executed demand for trial by jury, has refused to process motions for declaratory judgement and continue to threaten incarceration and other sanctions for not complying with their unconstitutional enforcement of Involuntary Servitude.

APPENDIX E

[PROPOSED EXAMPLE OF] ALIMONY INVOLUNTARY SERVITUDE COMPLAINT PORTAL

The U.S. Supreme Court case of Headman v. Hansen (202X) requires that Federal Courts investigate claims of suspected involuntary servitude by State Court Systems believed to be enforcing Involuntary Servitude in order to meet certain conflicting financial interests of the State .

1. **Federal Civil Rights Laws** are intended to protect citizens from State Court Systems which impose non-contractual, coerced, or otherwise abusive terms of involuntary servitude upon one citizen for the benefit of another citizen or state interest.

2. **Federal Supreme Court Case Headman v. Hansen (202X)** requires Federal District Courts to hear cases of suspected Involuntary Servitude imposed by State Court Systems when the denial of rights is suspected to have occurred within any of the following examples:
   - You had terms of involuntary Servitude imposed upon you which were not specified within a written pre-nuptial agreement.
   - You were threatened by an Officer of a State Court claiming that if you did not agree to terms of involuntary servitude in settlement, which were not specified within a written pre-nuptial agreement, that the State Court would impose more severe terms upon you.
   - You were threatened by an officer of a State Court that you would serve jail time, incur fines or suffer other State imposed penalties if you did not agree to and comply with terms of servitude, which were not specified within a written pre-nuptial agreement.
   - You were not granted State Court protection of law over a breach of a specified, or Court-implied, marital agreement with a former spouse.
   - You were not granted due process of law upon protective laws such as fault laws which were designed on their face to protect your rights after being a victim of a specified act of fault.

3. **The United States Constitution** was established to ensure citizens are protected from the taking of Life, Liberty or Property without due process of law and the **Thirteenth Amendment to the United State Constitution** forbids the existence of involuntary servitude, except as punishment for a crime whereof the party shall have been duly convicted, within the United States or any place subject to their Jurisdiction. Citizens who have been denied the protection of law through fraud are generally required to bring an action to have a Court remedy the denial of rights within a certain time of the occurrence of the denial of rights, however, in instances of fraud by a court, citizens are granted additional time based upon the date they became aware that the State Courts have been acting outside of the Constitution and denying them protection from Involuntary Servitude.

IF YOU BELIEVE YOU HAVE BEEN A VICTIM OF INVOLUNTARY SERVITUDE BY A STATE COURT SYSTEM THAT IS PLACING THE INTERESTS OF THE STATE ABOVE YOUR CONSTITUTIONAL RIGHT TO PROTECTION FROM INVOLUNTARY SERVITUDE YOU MUST SUBMIT A CIVIL RIGHTS COMPLAINT TO THE FEDERAL COURT SYSTEM WITHIN A REASONABLE TIME OF DISCOVERY THROUGH THE FOLLOWING LINK <INSERT LINK>

APPENDIX F

DECLARATION OF PETITIONER REGARDING INVOLUNTARY SERVITUDE

Under penalty of perjury, I Alan headman as a Citizen of the United States state as follows:

- I never signed a pre-nuptial agreement wherein I conceded to pay alimony to my former spouse should my marriage end in divorce.
- I was notified that although my divorce was caused by a clear act of fault which, on its face qualified me for protection of law, the Courts in Utah would not grant me protection of law.
- I was constructively notified that my rights to life, liberty and property were not God-given, inseparable or inalienable and that the State would act as if they owned my rights.
- I was instructed that the state would not look to voluntary concessions made for the assessment of alimony instead they would solely be made based upon who had an ability to pay and who had a need.
- I was instructed that if I chose to fight for my protection from unjustified involuntary servitude, or protection of fault laws, it would take years, tens of thousands (if not hundreds of thousands) of dollars, would steal resources from and be detrimental to my children but would not likely prevail against a system that looked to needs and ability not to the inseparability of citizen's rights without due process of law.
- I was coerced into a term of alimony, which included deception and omissions of facts filed with the Court, by Court officers who had sworn to uphold the Constitution including my right to be protected from Involuntary Servitude.
- Even following a 50% decline in income, specific divorce decree provisions that a loss of income will qualify as a material change in circumstance, and a concession that my 50% decline in income is a material change in circumstance by my former spouse, I have been fighting for my right to relief from alimony for approximately four years.
- Despite having not been convicted of any crime, I have been incarcerated, fined, labelled with false menacing labels and been issued threats by a state court system that should protect me.
- I DO NOT CONCEDED TO PAYING ALIMONY VOLUNTARILY
- ANY STATE COURT FORCING ME TO PAY ALIMONY IS DOING IT INVOLUNTARILY
- I AM ENTITLED TO FEDERAL PROTECTION FROM INVOLUNTARY SERVITUDE AS A CITIZEN OF THE UNITED STATES

I declare under penalty of perjury that the foregoing is true and correct.

November 1, 2020 — Date

Sign here /s/ Alan Headman

Typed or Printed Name Alan Headman

RE: Lawsuit Against Judge Hansen

From: Ashley Wood (ashley@bartonwood.com)

To: afam51@yahoo.com

Cc: brooke@bartonwood.com

Date: Thursday, September 19, 2019, 09:53 AM MDT

Dear Alan:

You can cc me on anything, but it is unnecessary, as I have nothing to do with the case or your claims.

Regards,

Ashley Wood

Attorney at Law

BartonWood

www.bartonwood.com

551 East South Temple St.

Salt Lake City, UT 84103

Telephone: (801)326-8300

Facsimile: (801) 326-8301

APPENDIX G

From: Alan Headman <afam51@yahoo.com>
Sent: Wednesday, September 18, 2019 7:49 PM
To: Ashley Wood <ashley@bartonwood.com>; Kara Barton <kara@bartonwood.com>
Cc: Brooke <brooke@bartonwood.com>
Subject: Lawsuit Against Judge Hansen

Ashley,

I wanted to let you know I have filed a Federal lawsuit against Judge Hansen. The subject matter of the lawsuit relates to a denial of due process, and neither you nor Camille are a party to this lawsuit. Although I do not intend to get relief over motions within the current case in district court and limit discussions in the Federal case to the denial of my Constitutional right to due process including a trial by jury, I anticipate that Judge Hansen may desire to bring details of the case into discussions as part of his defense to my claims. Before I engage in any interaction with judge Hansen or his counsel, I wanted to ask you in what manner you want to be involved? I will gladly copy you on all correspondence, invite you to all legal proceedings and give you all opportunity to be present should the subject matter of issues which are in the district court come up for discussion. I do not anticipate your involvement unless Judge Hansen makes claims that you drafted the orders from the March 27, 2019 trial and attempts to claim you are responsible for the claimed unconstitutional orders that resulted from that day. I want to give you full opportunity to be as involved as you deem appropriate. Please advise me as to your preferences.

Alan Headman

801.703.5422

afam51@yahoo.com

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