

No. 25A 572

IN THE Supreme Court
of the United States of America

Leslie Grace C. Buot

Plaintiff - Respondent

v.

Ian Simon R. Buenaventura

Defendant - Petitioner

Motion for a Stay

I appreciate the time of the Court.

Respectfully this is to request for a stay in proceedings. (Source: Supreme Court Rule 23)

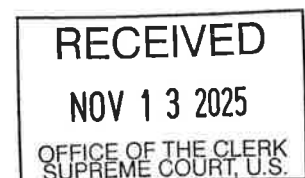
Relief was sought in the Lewiston District Court. An appeal was submitted to the Supreme Judicial Court.

“Complaint contained no legal basis, a fact, an explanation, and evidence. Ditto for the response to the motion. There were no affidavits and discovery materials included in the response.” Relief was sought in Lewiston District Court. “Motion contained legal basis, factual background, rationale, and proof. Nonetheless, the case was not dismissed with prejudice at the case management conference and mediation was even ordered. ¹ Motion was effectively denied “over the objection of one of the parties[.]” who was the plaintiff.” An “Appeal as of Right – Special Anti-SLAPP Motion” was submitted. Appeal was denied. ²

Motion for Stay was submitted to the United States Supreme Court September 22, 2025.

It was returned on October 2, 2025 along with a correspondence.

On October 6, 2025 I received the correspondence enclosed with it was the Motion for Stay dated September 22, 2025. On October 7, 2025, I submitted “Motion for Stay” to the Lewiston District. It was denied in an order dated October 23, 2025.



On October 10, 2025, I submitted "Motion for Stay" to the Supreme Judicial Court. There has been no response.

"An order [by the Lewiston District Court] dated October 23, 2025 ³ denied the "Special anti-SLAPP Motion" dated April 8, 2025. Same order denied the "Appeal as of Right – Special Anti-SLAPP Motion" dated May 27, 2025. Same order denied the "Motion to Amend the Special anti-SLAPP Motion" dated October 11, 2025. Same order denied the "Motion to Renew the Special anti-SLAPP Motion" dated October 11, 2025. A Notice of Appeal was submitted on October 27, 2025. On October 31, 2025, a Motion for Stay based on §735 was submitted.

November 3, 2025 at 2:19 pm CST, less than 24 hours before a final hearing, I was telephonically informed the final hearing was being continued because of an appeal.

Mootness ⁴

It does not moot the "systemic bias",

"There is a structural bias "in favor of breaking up our marriage, our relationship, and our family." I was described as " ... disturb Buenaventura ... " [by the Court] in a "final hearing" on September 19, 2025."

"I was informed on September 16, 2025 through a phone call that a "final hearing notice" was mailed out. This connotes a decision was going to be made in the absence of the other party. "[F]inal hearing notice" scheduled on September 19, 2025 was mailed out on August 29, 2025. Twenty (21) days after it's mailing, September 19, 2025, I have not received it in regular mail." As of [November 7], 2025, I have not received the "final hearing notice" scheduled on September 19, 2025."

It does not moot the "pervasive" "prejudice".

""Demonstrable prejudice" are apparent in the consequences, for example, from lack of respect for the sovereignty, independence, and security of others, "improper application of law[s]", and flouting the US constitution and international laws (eg., Universal Declaration of Human Rights, Convention Against Torture) with impunity."

It does not moot "the deliberate indifference towards the "irreparable harm"."

"Dangers of the deliberate indifference for the "irreversible" "adverse consequences" being and will be sustained by an individual who has no "affluence, influence, [preferred] immutable features, approved expression, or belief in 'bidder[s]'" are "palpable".

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring my request[s] to “dismiss with prejudice” [until I received the denials on October 27, 2025 which was 8 days before the final hearing].” “[“Special Anti-Slapp motion”] took [], 6 months, [2] weeks, [1] day[s] or [198] days to generate a result. Leaving only [8] days to [read, review, research, and respond accordingly] was “[orchestrated], coordinated, and carried out” to “harass a [pro se] defendant [unable to find a livelihood “on [his] own”[.]” for nearly nine (9) years] with a legally nonviable claim” and “a factually nonviable one[.]” “expedit[ing]” “substantive consequences: the impairment of First Amendment rights and the time and expense of defending against litigation that has no demonstrable merit.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 [where “[I] must appear” in person[.]] while ignoring” “my “choices” (eg. shelter, food, health, nutrition, car repairs, travel, clothes, school choice, university choices, self-improvement, ability to save for a rainy day, retirement) are being “debilitated” by “an enterprise” that “foment[s] an arms race.” On October 9, 2025, a “Motion for Alternative Format For Court Proceeding” conducted by “video” was submitted. It was allowed in an order dated October 13, 2025. I received it on October 17, 2025.

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring my [] motion for summary judgment [until I received the denial on October 27, 2025 which is 8 days before the final hearing and where I submitted my reply to the “Plaintiff's [Response] to Defendant's Motion for Summary Judgment" on October 28, 2025].”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while [denying]...my request[s for] “online legal research materials resource” in an order issued on August 1, 2025 which I did not receive.

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 ... without responses to my request[s for] ... evidence ... ” until it was denied on October 6, 2025 whereas “[t]he Court [stated it] can find that based on one party's assertion, and testimony, and evidence to the Court, that there are irreconcilable marital differences.” Meanwhile, “[l]egal basis for the divorce action is unconstitutional.” “Complaint has no legal basis, factual basis, reasoning, and evidence supporting its claim.” “None of the twenty two (22) pages that were served contained a legal basis, factual background, and rationale, and proof underlying the ground for the divorce.” “Glaring deficiencies (eg., United States constitution, Maine Rule of Civil Procedure 8(a), [Haines v Kerner,] Bell Atlantic Corp v Twombly cited in Ashcroft v Iqbal) exist in the complaint.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring [[i]n]juries from the “unprecedented punishment” (eg., no receipt of orders [dated August 1, 2025 and August 22, 2025 until October 27, 2025], no receipt of “final hearing notice” scheduled on September 19, 2025)].”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring” “as of October 23, 2025, date of [Motion to Set Aside Orders Issued on August 1, 2025 and August 27, 2025], I have not received the August 1, 2025 order. Difference between the date of issuance and [October 23, 2025] is eighty-three (83) days.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring” “[a]s of October 23, 2025, date of [Motion to Set Aside Orders Issued on August 1, 2025 and August 27, 2025], I have not receive[d] the August 27, 2025 orders. Difference between the date of issuance and [October 23, 2025] is fifty (57) days.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring” “[a] change of address request was submitted to USPS on June 10, 2025 [] with a start forwarding date of June 30, 2025.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring” “[m]y new address was provided to the Court on July 19, 2025.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring” “I confirmed that my address was correct.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring” “I inquired about when the August 1, 2025 order was mailed. There was no specific date provided by the Court. I inquired when the August 27, 2025 orders were mailed out. There was no specific date provided by the Court.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring” “[o]rders were returned to the Lewiston District Court as “undeliverable” on August 15, 2025. My address on the mailed out orders did not include an apartment number.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring” “I asked about when orders are mailed. There is no clear procedure.”

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 ... without responses to my request[] [for a] discovery [schedule]... ” and a full, impartial, and fair discovery.

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 ... without responses to my request[] [for] “arguments” and “briefing” on substantive federal questions.” On April 29, 2025, the first hearing, “I asked [the Court] where was I supposed to submit the [“Special anti-SLAPP”] motion. I was informed that it was to be submitted to a district court. An order for mediation was issued on May 5, 2025.” Appeal from the order was denied. On October 11, 2025, “I [sought] an “expedited hearing of [Special anti-SLAPP] motion[s] and a “ruling” on the Anti-SLAPP motion. ” There was no brief from plaintiff. There were no arguments.

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while while [denying] my request” to “dismiss with prejudice”” [based on “fraud on the Court and the public”] without a response from plaintiff, brief, and arguments.

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring my request” “for a jury trial”.

“This is apparent in its “readiness” “to process” a “[f]inal hearing” on November 4, 2025 while ignoring my request” “under section 740” “for costs, attorney's fees, and expenses incurred defending against an unmeritorious action.”

It does not moot that “[i]n connection with “best interests”, there is no definition, no standard, no legislative history, and no case law explaining these two (2) words. “[Proposed divorce judgment does] not provide any proof leading to and at its decision.” There is no explanation in the proposed judgment how the “finding” is made. There are no “testimon[ies]”. There are no evidence.”

Extraordinary character ⁵

“The retaliation methods being deployed against me and my family members are voluminous, various, vicious, violent, and depraved.” “In light of the nature, extent, duration, and depth of the misconduct, at a minimum it is strong circumstantial evidence that the adverse actions in their totality are carried out with retaliatory intent.”

“[F]racture families”

“Subterfuge activities with altruistic fronts fracture families. Care for children is not in the sphere of knowledge of agencies especially those who are supposed to protect. With extraordinary power of surveillance, children are abused by a religious denomination for decades. [] Additionally, knowing my family members were occupants of my vehicle, a car crashed violently unto mine. Watching for the welfare of women is not within the parameters of civil service. While sovereign nations and 34 other foreign leaders are surveilled [], at least 16,760 patients [] were abused for nearly thirty (30) years [] at university by a campus gynecologist. []”

Abuse in summary ⁶

“[My family] ha[s] a constitutional right and human right to life.”

“The loss of [Attorney Buenaventura's and Mrs. Buenaventura]'s "li[v]e[s] or libert[ies]" are irreversible.”

“...[M]y mother was and is being subjected to defamation. She was insulted. She was tortured. She was deceived. She was coerced. She was carved out. Her due process (eg., life) rights were deprived. She was denied her day in Court.”

“My mother was 87 years old when her due process rights (eg., life) were denied. She was living with a caretaker. She had no children at her side and to defend her. I was carved out from her. These facts did not show a threat to national security exist. Suppression of speech was “far-reaching” that my mother who was an octogenarian widow living away from her children in a country in far east Asia was subject to surveillance, “... was coerced to write[.]”, “... was subjected to insults[.]”, and “[whose] video of her in her undergarments while being insulted was sent to me through her cellular phone.”

“Ms. Doe 3 is a survivor of two (2) attempts on her life.” Ms. Jane Doe 3 lost her “home, friends, school, community, standing in California, and grandmother.” “[Ms. Doe 3's] education is being destabilized.” “I submitted applications to eleven (11) schools on behalf of my child. None accepted her. She could not transfer to a private physical school even when she has good grades. With no remorse, ongoing retaliatory activities to silence my speech have been working overtime weaponizing systems like education. It is exceptional in slogans. An example is “We rise by uplifting others.” It is another ruse to cover up self promotion of the favored (eg., demographics, expression) while exploiting the defenseless and who have no voice.” A recent example is that she lost her class ranking of top “3” out of a total of “220” “students”.

“She was falsely imprisoned in a School 3 [in Maine]. Under the guise of discipline, she was held in a room with an individual doubling as an agent of a school while her parents were not by her side. It was an intimidation method.”

“[S]he is one of the victims of this weaponization of the system of the court ... ”

“Equal Justice Under Law” - “less genuine” - “more illusory”

“The children and youth growing in a nation that is obsessed with public opinion and image witness that commitments in the most basic unit of society they are born in are judged by capacious and hollow words, are not evaluated in substance, are not measured by deeds, and are not gauged by outcome. “This looks like a well developed policy by the [state] government to avoid [commitments] entirely rendering the ideal of “Equal Justice Under Law” less genuine and more illusory.””

Preliminary injunction ⁷

Reasonable probability certiorari will be granted

“At least one (1) state law is repugnant to the United States constitution.” “It appears the Supreme Judicial Court has not received and reviewed a case as of the date of its order wherein the Uniform

Public Expression Protection Act with an effective date of January 1, 2025 applies. Citations on the order predated the effective date of the broader UPEPA which repealed and replaced the narrower 14 M.R.S. § 556.”

1. likelihood of success on the merits

“Spoliation and manufacture of documents, activities, tangible articles, and electronic stored information have been occurring for years.”

“ ... [M]y entire file storage was destroyed.”

2. likelihood of irreparable harm

“A hegemony “deeply” contented with public relations while surreptitiously monopolizing the field by racketeering activities (eg., bribery, economic duress, extortion) to the prejudice of people will likely have no inclination to illustrate and prove that its regulations are the least restrictive alternative means. Behind the spectacle, commitment lies on a “[b]udget” [eg., “of CIA”] “continu[ing] to grow”.”

“[T]here is no “ ... immediate stoppage of the harms ... ”

3. public interest

“Enjoining unconstitutional conduct “is the highest public interest.””⁸

“ ... [S]urveillance is an inherently dangerous activity not to mention it is imbued with a far greater capacity for harm (eg., suppression of speech, injuries caused by a car crash, deprivation of due process).”

“SLAPPs” “ ... can be brought by ... individuals ... or government officials across all points of the political or social spectrum.”⁹ “ ... [C]reative plaintiff can disguise what is actually a SLAPP as a “garden variety” tort action.” “[W]hile SLAPP suits ‘masquerade as ordinary lawsuits’ the conceptual features which reveal them as SLAPP’s are that they are generally meritless suits brought by large private interests to deter common citizens from exercising their political or legal rights or to punish them for doing so.”

“To limit the detrimental effects SLAPPs can have, 32 states, as well as the District of Columbia and the Territory of Guam, have enacted laws to both assist defendants in seeking dismissal and to deter vexatious litigants from bringing such suits in the first place.”¹⁰ “Although procedural in operation, these laws protect substantive rights, and therefore have substantive effects.”¹¹

Wherefore, this is to request for a stay in proceedings.

I am appreciative of the time of the Court.

November 7, 2025.

Respectfully Submitted,



Ian R. Buenaventura

List of Endotes

- 1 Mediation Order
- 2 Order Dismissing Appeal
- 3 Order denying “Special anti-SLAPP Motion” , “Appeal as of Right – Special Anti-SLAPP Motion”, “Motion to Amend the Special anti-SLAPP Motion” and “Motion to Renew the Special anti-SLAPP Motion”
- 4 Weinstein v. Bradford
- 5 Kilbourn v Thompson cited in Libby et al v Fecteau et al
- 6 Rosenberger v. Rector & Visitors of UVA cited in Libby et al v Fecteau et al
- 7 Roman Catholic v Diocese of Brooklyn v Cuomo cited in Libby et al v Fecteau et al
- 8 United States v. Raines cited in Libby et. al. v Fecteau et. al.
- 9 131st Maine Legislature, First Regular Session-2023, An Act to Strengthen Freedom of Speech Protections by Extending Laws Against Strategic Lawsuits Against Public Participation
- 10 Id.
- 11 Id.

Endnote 1

LEWISTON DISTRICT COURT
APR 9 '25 AM 11:16

State of Maine
District Court
Southern Androscoggin Division

Leslie Grace C. Buot

- v -

Ian Simon R. Buenaventura

Case No. LEWDC-DWC-2025-00042

ORDER OF THE COURT

Defendant requests dismissal of the Complaint for Divorce. This Motion shall be addressed by a judge at or prior to a final hearing but not before the parties participate in mediation.

5/5/2025

Jms
Magistrate, Maine District Court

Special anti-SLAPP motion

I appreciate the time of the Court.

Respectfully, I request the Court to dismiss the divorce with prejudice. It is without merit. I deny there are "irreconcilable marital differences". It was filed to silence, dissuade, and punish the exercise of my constitutional rights (eg., 1st amendment) and human rights (eg., article 19).

Plaintiff knows that I have been unable to find a livelihood "on my own". She knows that there were petitions I filed. She knows that I guide our child in her education. Complaint has no legal basis, factual basis, reasoning, and evidence supporting its claim. Complaint was filed anyway.

Background

I spoke against overtime shaving. There is surveillance on my family and I. Plaintiff confirmed, "Who wants to be surveilled?" Person 1 affirmed that there is surveillance. Person 2 verified that there is surveillance. Legal basis for claims in my petition are the U.S. constitution, Freedom of Information Act, Foreign Intelligence Surveillance Act, Administrative Procedure Act, Title VI of the Civil Rights Act of 1964, Federal Tort Claim Act, Racketeering Influence Corrupt Organization Act, and Geneva Conventions. "Retaliatory activities are "created, coordinated, and carried out" against me and my family members." One type of retaliation is that I am unable to find a livelihood "on my own".

Racketeering activities (eg., obstruction of justice) are zealously executed. "Mrs. Buenaventura was

Endnote 2

STATE OF MAINE

SUPREME JUDICIAL COURT
Sitting as the Law Court
Docket No. And-25-246

Leslie G.C. Buot

v.

ORDER DISMISSING APPEAL

Ian S.R. Buenaventura

Ian Buenaventura has appealed from an order of a family law magistrate referring to a District Court judge Buenaventura's special motion under the anti-SLAPP statute to dismiss this divorce action. The Clerk of the Law Court has docketed the appeal under Law Court docket number And-25-246.

The trial court has not yet entered any judgment against any party. As a result, not all claims against all parties have been resolved, and Quinn's appeal is interlocutory. *See Sanborn v. Sanborn*, 2005 ME 95, ¶ 4, 877 A.2d 1075. Although the denial of a special motion to dismiss is immediately appealable, *see Nader v. Me. Democratic Party*, 2013 ME 51, ¶ 12, 66 A.3d 571, the order that Buenaventura appeals from does not deny the special motion to dismiss but merely refers it to a District Court judge.

It is therefore ORDERED that Buenaventura's appeal is DISMISSED as interlocutory. Because the appeal is dismissed, the trial court need not transmit the record to the Law Court.

Dated: June 24, 2025

For the Court,

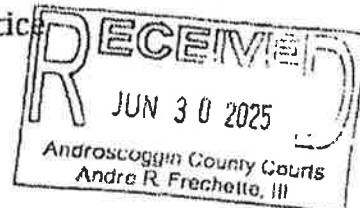


Andrew M. Horton
Associate Justice

RECEIVED

JUN 25 2025

Clerk's Office
Maine Supreme Judicial Court



Endnote 3

STATE OF MAINE
ANDROSCOGGIN, ss.

DISTRICT COURT
Location: LEWISTON
Docket No: DWC-2025-42

LESLIE GRACE BUOT,
Plaintiff,

v.

IAN SIMON BUENAVENTURA,
Defendant.

**ORDER ON
OUTSTANDING MOTIONS**

Presently before the Court are five outstanding motions filed by Defendant Ian S. Buenaventura: a “Special” Anti-SLAPP Motion to Dismiss, filed on April 9, 2025, and filed again, styled as an “Appeal as of Right,” on May 27, 2025, to which Plaintiff Leslie G. Buot filed responses on April 18, 2025 and June 18, 2025; a Motion for Summary Judgment, filed on September 19, 2025, to which Plaintiff filed a response on October 10, 2025; a Motion for Stay of the Proceedings, filed on October 8, 2025, to which Plaintiff filed a response on October 10, 2025; a Motion to Amend and Renew the Anti-SLAPP motion, filed on October 11, 2025;¹ and a Motion to Dismiss for Fraud on the Court and the Public, filed on October 20, 2025.² Final hearing in this matter is scheduled on November 4, 2025. Due to the rapid approach of the parties’ trial date, the Court disposes of all outstanding motions herein, addressing each in turn below.

I. Motion to Amend the Anti-SLAPP Motion

A. Legal Standard—Motion to Amend

“Whether to allow a pleading amendment rests with the court’s sound discretion.” *In re Sen*, 1999 ME 83, ¶ 10, 730 A.2d 680. Maine Rule of Civil Procedure 15(a) provides that leave

¹ Defendant’s certificate of service states that a copy of this motion was sent to Plaintiff on October 14, 2025.

² Defendant’s certificate of service states that a copy of this motion was sent to Plaintiff on October 20, 2025.

to amend should be freely given when justice so requires. “Undue delay,³ bad faith, undue prejudice, or futility of amendment are grounds for denying a motion to amend.” *Paul v. Town of Liberty*, 2016 ME 173, ¶ 7, 151 A.3d 924 (citation modified). “If the moving party is not acting in bad faith or for delay, the motion will be granted in the absence of undue prejudice to the opponent.” *Bangor Motor Co. v. Chapman*, 452 A.2d 389, 392 (Me. 1982) (quoting 1 Field, McKusick & Wroth, *Maine Civil Practice* § 15.4 (2d ed. 1970)). “[A] trial court should rule on a motion for leave to amend before acting on another motion, such as a motion to dismiss, that could be dispositive of the original complaint.” *Paul*, 2016 ME 173, ¶ 7, 151 A.3d 924.

Maine Rule of Civil Procedure 7 requires a moving party to include a memorandum of law with citations to supporting authorities, as well as a draft order granting the motion and a specific statement of the relief to be granted with the motion to amend. *See* M.R. Civ. P. 7(b)(3). “[W]hen the court is presented with a motion to amend with no facts indicating what the amendment would entail, the court has no choice but to deny the motion to amend.” *Bahre v. Liberty Group, Inc.*, 2000 ME 75, ¶ 11, 750 A.2d 558.

B. Application

Defendant’s motion did not comply with M.R. Civ. P. 7(b)(3). Defendant’s motion does not include facts indicating what the amendment entails. Without such information, the Court cannot ascertain what amendment the Defendant is seeking and therefore must deny the motion.

II. Anti-SLAPP Motion to Dismiss

A. Legal Standard—Anti-Slapp Generally (14 M.R.S. §§ 731-742)

³ “The passage of time alone is not a ground to deny a motion to amend.” *Mut. Fire Ins. Co. v. Richardson*, 640 A.2d 205, 207 (Me. 1994).

In 2023, the Legislature repealed the prior anti-SLAPP statute and replaced it with the Uniform Public Expression Protection Act. *See* P.L. 2023, ch. 626, §§ 1-7 (effective Jan. 1, 2025) (codified at 14 M.R.S. §§ 731-742 (2025)). “[T]he Act is available to a moving party if the conduct underlying the cause of action was ‘itself’ an ‘act in furtherance’ of the party’s exercise of First Amendment rights on a matter of public concern.” UPEPA § 7, cmt. 2, *included with* 14 M.R.S. § 738 (2024) (citing *City of Cotati v. Cashman*, 52 P.3d 695, 701 (2002)). The new Uniform Public Expression Protection Act (UPEPA) “employs a three-phase analysis seen in many states’ statutes.” UPEPA Title 14, ch. 203, sub 5, prefatory note, *included with* 14 M.R.S. §§ 731-742 (2024). The first step “focuses on the movant’s activity, and whether the movant can show that it has been sued for that activity.” UPEPA § 2, cmt. 1, *included with* 14 M.R.S. § 733 (2024) (citing *Navellier v. Sletten*, 52 P.3d 703, 711 (Cal. 2002)). “The moving party meets this burden by demonstrating two things: first, that it engaged in conduct that fits one of the three categories spelled out in [14 M.R.S. § 733(2)]; and second, that the moved-upon cause of action is premised on that conduct.” UPEPA § 7, cmt. 2, *included with* 14 M.R.S. § 738 (2024). “If the movant cannot satisfy the first step—in other words, cannot show that the cause of action is linked to First Amendment activity on a matter of public concern—then the court will deny the motion without ever proceeding to the second or third step.” UPEPA § 2, cmt. 1, *included with* 14 M.R.S. § 733 (2024) (citing Thomas R. Burke, *Anti-Slapp Litigation* § 1.2 (2019)).⁴

B. Anti-Slapp in Divorce

Divorces in Maine are governed by 19-A M.R.S. §§ 901-1051 and typically involve issues such as spousal support, child support, parental rights, and property division, which are unrelated to the exercise of petitioning rights. The anti-SLAPP statute does not provide a basis for

⁴ The Court does not address the second and third step because it concludes that the Defendant has not met his burden on the first step.

dismissing claims in divorce proceedings because such claims do not arise from petitioning activity as defined in 14 M.R.S. § 733 and Maine case law interpreting the prior anti-SLAPP statute. Additionally, Maine's prior anti-SLAPP statute has been interpreted narrowly to ensure that it does not infringe on the *nonmoving party's* right of access to the courts. In application, the Law Court has attempted to balance the "tension" between defendant's right to petition with the plaintiff's right to seek redress through the judicial system. *See Thurlow v. Nelson*, 2021 ME 58, ¶ 9, 263 A.3d 494.

C. Application

Defendant asserts that his expressed views on the education of the parties' minor child and his employment were in part what Plaintiff premised her divorce action on. Plaintiff's Complaint for Divorce, however, alleges irreconcilable differences. Any statements Defendant made to his wife on the issue of their child's education, or his employment were marital discussions and not matters of public concern. Therefore, the Court finds that the Defendant has failed to prove 1) that he engaged in conduct specified in 14 M.R.S. § 733(2); and 2) that the Plaintiff's divorce action is premised on that conduct.

Furthermore, applying the anti-SLAPP statute to divorce cases would extend its reach beyond its intended purpose and could improperly limit access to the courts for resolving family law disputes. The statute is designed to protect individuals from lawsuits that target or chill the exercise of their constitutional rights, particularly the right to petition the government.

III. Motion for Summary Judgment

A. Legal Standard—Summary Judgment (M.R. Civ. P. 56)

"Summary judgment is appropriate when review of the parties' statements of material facts and the record evidence to which the statements refer, considered in the light most favorable to the

non-moving party, demonstrates that there is no genuine issue of material fact in dispute and the moving party is entitled to judgment as a matter of law.” *Remmes v. The Mark Travel Corp.*, 2015 ME 63, ¶ 18, 116 A.3d 466; *see also* Maine Rule of Civil Procedure 56(c); *Polk v. Town of Lubec*, 2000 ME 152, ¶ 57, 756 A.2d 510 (quoting *June Roberts Agency, Inc. v. Venture Properties, Inc.*, 676 A.2d 46, 48 (Me. 1996) (“Summary judgment is appropriate when ‘the party that bears the burden of proof on an essential element at trial has presented evidence that, if [they] presented no more, would entitle the opposing party to a judgment as a matter of law.’”). The party opposing summary judgment will be given the benefit of any reasonable inferences that can be drawn from the facts presented. *Perkins v. Blake*, 2004 ME 86, ¶ 7, 853 A.2d 752.

A motion for summary judgment must include (1) the motion, including the required Rule 7(b)(1) notice; (2) a memorandum of law in support of the motion; (3) a statement of material facts with appropriate record references; (4) copies of those corresponding record references; and (5) a proposed order “which grants the motion and specifically states the relief to be granted by the motion.” M.R. Civ. P. 7, 56; *see also* *Levine v. R.B.K. Caly Corp.*, 2001 ME 77, ¶ 6, 770 A.2d 653.

A statement of material facts must be “set forth in a separately numbered paragraph” and *contain specific record references to each proffered fact*. M.R. Civ. P. 56(h)(1). Record references must point to evidence that would be admissible at trial and must be to “record material properly considered on summary judgment.” M.R. Civ. P. 56(e), (h)(4). “To be admissible at the summary judgment stage, documents must be authenticated by and attached to an affidavit that meets the requirements of Rule 56(e).” *FIA Card Services, N.A. v. Saintonge*, 2013 ME 65, 70 A.3d 1224 (quoting *Cach, LLC v. Kulas*, 2011 ME 70, ¶ 11, 21 A.3d 1015). Affidavits must be made on personal knowledge, must set forth such facts as would be admissible in evidence, and must show

affirmatively that the affiant is competent to testify to the matters stated therein.” *Platz Associates v. Finley*, 2009 ME 55, ¶ 16, 973 A.2d 743 (internal quotation marks omitted); *see also* M.R. Civ. P. 56(e).

“A party’s citation to its own complaint is insufficient to support a material fact.” *Deutsche Bank Nat. Tr. Co. v. Raggiani*, 2009 ME 120, ¶ 6, 985 A.2d 1. “A statement of material facts must directly refer the court to the specific portions of the record from which each fact is drawn. . . . The court is neither required nor permitted to independently search a record to find support for facts offered by a party.” *Levine v. R.B.K. Caly Corp.*, 2001 ME 77, ¶ 9, 770 A.2d 653. “In the absence of specific record references, a proffered fact is not properly before the court and cannot provide a basis for judgment.” *Id.*

B. Application

Defendant’s Motion for Summary Judgment failed to comply with M.R. Civ. P. 56. Additionally, Defendant has failed to demonstrate that there is no genuine issue of material fact in dispute. Defendant’s motion asserts that there are no “irreconcilable marital differences.” This is contrary to Plaintiff’s Complaint, which alleges irreconcilable marital difference and, therefore, demonstrates that there is a genuine issue of material fact in dispute.

IV. Motion for a Stay of Proceedings

A. Legal Standard—Stay of Proceedings

Maine courts have recognized that the power to stay proceedings is inherent in their authority to manage their dockets efficiently. *See Darling v. Am. Graphics Inst., Inc.*, No. Civ.A. CV-02-602, 2003 WL 22019549, at *2 (Aug. 6, 2003) (citing *Culler Associates, Inc. v. Merrill Trust Co.*, 395 A.2d 453, 456 (Me. 1978)). “A stay of proceedings . . . is not a matter of right to the parties, but rests within the sound discretion of the trial court.” *Fitch v. Whaples*, 220 A.2d

170, 172 (Me. 1966). Factors that the court may consider include whether the subsequent action was designed to harass the adverse party; the nature of the respective actions; the applicable law; the expense and inconvenience involved; the availability of witnesses; the stage of proceedings in another court, if applicable; and the delay in obtaining trial. *Id.* at 173. Each case presents unique circumstances that may necessitate different outcomes. *Id.* In the context of divorce actions, courts may stay proceedings to allow adjudication of the same action pending in another jurisdiction. *See, e.g., Willey v. Willey*, 2015 ME 102, ¶ 2, 121 A.3d 111. The party requesting a stay bears the burden of demonstrating that the circumstances justify the court’s exercise of discretion.⁵

B. Application

Defendant requests a stay in part because “[a]n appeal was submitted to the Supreme Judicial Court.” This appeal was dismissed by the Law Court on June 24, 2025, and therefore is not a basis for a stay. Additionally, Defendant filed a “Motion to Request Trial Schedule” on September 18, 2025, specifically requesting that this matter be set for trial. The request to set the matter for trial was granted on October 6, 2025, and the matter is now set for final hearing on November 4, 2025. Given the matter is set for final hearing in less than one month, a stay at this point in the proceedings is unwarranted.

V. Motion to Dismiss for Fraud on the Court and the Public

A. Legal Standard—Fraud upon the Court

“A court has the authority to strike pleadings as a sanction for a party’s fraud on the court or an attempt to perpetrate a fraud on the court.” 71 C.J.S. *Pleading* § 662 (May 2025). Fraud

⁵ *Cf., Respect Maine PAC v. McKee*, 622 F.3d 13, 15 (1st Cir. 2010) (“A party requesting injunctive relief pending appeal bears the burden of showing that the circumstances of the case justify the exercise of the court’s discretion.”); *Nat’l Org. for Marriage v. Comm’n on Governmental Ethics & Elections Practices*, 2015 ME 103, ¶ 14, 121 A.3d 792 (party seeking a stay pending appeal has the burden to demonstrate the necessary factors); *Champagne v. Mid-Maine Med. Ctr.*, 1998 ME 87, ¶ 19, 711 A.2d 842 (“A party seeking a continuance has the burden of showing sufficient grounds for granting the motion[.]”).

upon the court requires clear and convincing proof that an advantage was gained in obtaining a judgment through an act of bad faith, whereby the court was made an instrument of injustice. *Estate of Paine*, 609 A.2d 1150, 1153 (Me. 1992). Fraud cannot be presumed and must be established by more than surmise, suspicion, or conjecture. *Harmon v. Perry*, 133 Me. 186, 175 A. 310, 311 (1934). The circumstances constituting fraud must be stated with particularity. *Beck v. Sampson*, 158 Me. 502, 510, 186 A.2d 783, 788 (1962); *see also* M.R. Civ. P. 9(b); 2 Harvey & Merritt, *Maine Civil Practice* § 9:2 (3d ed. Sept. 2025). The evidence must be clear, full, and convincing. *Harmon*, 175 A. at 311.

B. Legal Standard—Fraud Upon the Public

“Acts and conduct are stigmatized as being frauds on the public where false representations are addressed to all the world.” 37 Am. Jur. 2d *Fraud and Deceit* § 14 (May 2025). As with fraud upon the court, the heightened pleading standards of M.R. Civ. P. 9(b) also apply here. To establish “fraud upon the public,” the fraud must be directed at the public generally, rather than being limited to a private transaction. *See, e.g., Living the Dream Films, Inc. v. Aloris Entm’t, LLC*, 2021 WL 4342700, at *9 (S.D.N.Y. Sept. 24, 2021), *report and recommendation adopted*, 2021 WL 5822233 (S.D.N.Y. Dec. 7, 2021); *Pyskaty v. Wide World of Cars, LLC*, 856 F.3d 216, 226 (2d Cir. 2017) (both cases applying New York law distinguishing between ‘a gross and wanton fraud upon the public’ and ‘an isolated transaction incident to an otherwise legitimate business,’ the latter of which does ‘not constitute conduct aimed at the public generally’). In Maine, the concept of “fraud upon the public” is primarily addressed through the Unfair Trade Practices Act (UTPA), *see* Title 24-A, ch. 23, and various other statutes that protect against fraudulent activity in specific contexts, *see, e.g.,* 17-A M.R.S. §§ 901-909.

C. Application

Defendant's Motion to Dismiss for fraud contains a running list of complaints about the divorce process thus far. It does not establish clear and convincing proof that an advantage was gained in obtaining a judgment because no judgment has been issued. The Motion also does not establish any fraud directed at the public generally because the Plaintiff's complaint for divorce is against the Defendant individually. Therefore, the Defendant has failed to establish any fraud upon the court or the public.

The entry is:

October 11, 2025 Motion to Amend and Renew the Anti-SLAPP Motion is DENIED.

The April 9, 2025 "Special Anti-SLAPP Motion" and May 28, 2025 "Appeal as of Right" Anti-SLAPP Motion to Dismiss is DENIED.

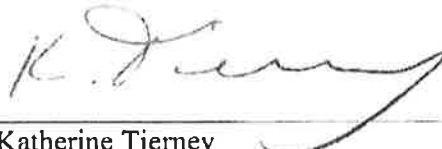
September 19, 2025 Motion for Summary Judgment is DISMISSED.

October 8, 2025 Motion for a Stay of Proceedings is DENIED.

October 20, 2025 Motion to Dismiss for Fraud on the Court and the Public is DISMISSED.

The Clerk is directed to incorporate this Order into the docket by reference pursuant to Rule 79(a) of the Maine Rules of Civil Procedure.

Dated: 10/23/2025


Katherine Tierney
Judge, Maine District Court

STATE OF MAINE
DISTRICT COURT
SOUTHERN ANDROSCOGGIN DIVISION
P.O. BOX 1345
LEWISTON, MAINE 04243-1345

SO. MAINE 041

24 OCT 2025 PM 3 L

FIRST CLASS



US POSTAGETM PITNEY BOWES

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IAN BUENAVENTURA
6000 OHIO DR APT 2915
PLANO TX 75093

75093-733040



Appendix

Supreme Judicial Court of Maine

Leslie Grace C. Buot

- v -

Ian Simon R. Buenaventura

)
)
)
)
)

Docket No. And-25-246

Motion for Stay

Submitted : October 10, 2025.

I appreciate the time of the Court.

Respectfully this is to request for a stay in proceedings. (Source: Supreme Court Rule 23.3)

Relief was sought in the Lewiston District Court. An appeal was submitted to the Supreme Judicial Court.

“Complaint contained no legal basis, a fact, an explanation, and evidence. Ditto for the response to the motion. There were no affidavits and discovery materials included in the response.” Relief was sought in Lewiston District Court. “Motion contained legal basis, factual background, rationale, and proof. Nonetheless, the case was not dismissed with prejudice at the case management conference and mediation was even ordered. ¹ Motion was effectively denied “over the objection of one of the parties[.]” who was the plaintiff.” An “Appeal as of Right – Special Anti-SLAPP Motion” was submitted. Appeal was denied. ²

Extraordinary character ³

“The retaliation methods being deployed against me and my family members are voluminous, various, vicious, violent, and depraved.” “In light of the nature, extent, duration, and depth of the misconduct, at a minimum it is strong circumstantial evidence that the adverse actions in their totality are carried out with retaliatory intent.”

“[F]racture families”

“Subterfuge activities with altruistic fronts fracture families. Care for children is not in the sphere of knowledge of agencies especially those who are supposed to protect. With extraordinary power of surveillance, children are abused by a religious denomination for decades. [] Additionally, knowing my family members were occupants of my vehicle, a car crashed violently unto mine. Watching for the welfare of women is not within the parameters of civil service. While sovereign nations and 34 other foreign leaders are surveilled [], at least

16,760 patients [] were abused for nearly thirty (30) years [] at university by a campus gynecologist. []”

Abuse in summary ⁴

“The loss of [Attorney Buenaventura's and Mrs. Buenaventura]'s "li[v]e[s] or libert[ies]" are irreversible.”

“...[M]y mother was and is being subjected to defamation. She was insulted. She was tortured. She was deceived. She was coerced. She was carved out. Her due process (eg., life) rights were deprived. She was denied her day in Court.”

“My mother was 87 years old when her due process rights (eg., life) were denied. She was living with a caretaker. She had no children at her side and to defend her. I was carved out from her. These facts did not show a threat to national security exist. Suppression of speech was “far-reaching” that my mother who was an octogenarian widow living away from her children in a country in far east Asia was subject to surveillance, “... was coerced to write[.]”, “... was subjected to insults[.]”, and “[whose] video of her in her undergarments while being insulted was sent to me through her cellular phone.”

“Ms. Doe 3 is a survivor of two (2) attempts on her life.” Ms. Jane Doe 3 lost her “home, friends, school, community, standing in California, and grandmother.” “[Ms. Doe 3's] education is being destabilized.” “I submitted applications to eleven (11) schools on behalf of my child. None accepted her. She could not transfer to a private physical school even when she has good grades. With no remorse, ongoing retaliatory activities to silence my speech have been working overtime weaponizing systems like education. It is exceptional in slogans. An example is “We rise by uplifting others.” It is another ruse to cover up self promotion of the favored (eg., demographics, expression) while exploiting the defenseless and who have no voice.” A recent example is that she lost her class ranking of top “3” out of a total of “220” “students”.

“She was falsely imprisoned in a School 3 [in Maine]. Under the guise of discipline, she was held in a room with an individual doubling as an agent of a school while her parents were not by her side. It was an intimidation method.”

“[S]he is one of the victims of this weaponization of the system of the court ...”

“Equal Justice Under Law” - “less genuine” - “more illusory”

“The children and youth growing in a nation that is obsessed with public opinion and image witness that commitments in the most basic unit of society they are born in are judged by capacious and hollow words, are not evaluated in substance, are not measured by deeds, and are not gauged by outcome. “This looks like a well developed policy by the [state] government to

avoid [commitments] entirely rendering the ideal of "Equal Justice Under Law" less genuine and more illusory.””

Preliminary injunction⁵

Reasonable probability certiorari will be granted

“At least one (1) state law is repugnant to the United States constitution.” “It appears the Supreme Judicial Court has not received and reviewed a case as of the date of its order wherein the Uniform Public Expression Protection Act with an effective date of January 1, 2025 applies. Citations on the order predated the effective date of the broader UPEPA which repealed and replaced the narrower 14 M.R.S. § 556.”

1. likelihood of success on the merits

“Spoliation and manufacture of documents, activities, tangible articles, and electronic stored information have been occurring for years.”

“... [M]y entire file storage was destroyed.”

2. likelihood of irreparable harm

“A hegemony “deeply” contented with public relations while surreptitiously monopolizing the field by racketeering activities (eg., bribery, economic duress, extortion) to the prejudice of people will likely have no inclination to illustrate and prove that its regulations are the least restrictive alternative means. Behind the spectacle, commitment lies on a “[b]udget” [eg., “of CIA”] “continu[ing] to grow”.”

“[T]here is no ” ... immediate stoppage of the harms ... ”

3. public interest

“Enjoining unconstitutional conduct “is the highest public interest.””⁶

“... [S]urveillance is an inherently dangerous activity not to mention it is imbued with a far greater capacity for harm (eg., suppression of speech, injuries caused by a car crash, deprivation of due process).”

“SLAPPs” “... can be brought by ... individuals ... or government officials across all points of the political or social spectrum.”⁷ “... [C]reative plaintiff can disguise what is actually a SLAPP as a “garden variety” tort action.” “[W]hile SLAPP suits ‘masquerade as ordinary lawsuits’ the conceptual features which reveal them as SLAPP’s are that they are generally meritless suits brought by large private interests to deter common citizens from exercising their political or legal rights or to punish them for doing so.”

“To limit the detrimental effects SLAPPs can have, 32 states, as well as the District of Columbia and the Territory of Guam, have enacted laws to both assist defendants in seeking dismissal and to deter vexatious litigants from bringing such suits in the first place.”⁸ “Although procedural in operation, these laws protect substantive rights, and therefore have substantive effects.”⁹

This is to request for a stay in proceedings.

I am appreciative of the time of the Court.

Respectfully submitted,



Ian R. Buenaventura

List of Endotes

- 1 Mediation Order
- 2 Order Dismissing Appeal
- 3 Kilbourn v Thompson cited in Libby et al v Fecteau et al
- 4 Rosenberger v. Rector & Visitors of UVA cited in Libby et al v Fecteau et al
- 5 Roman Catholic v Diocese of Brooklyn v Cuomo cited in Libby et al v Fecteau et al
- 6 United States v. Raines cited in Libby et. al. v Fecteau et. al.
- 7 131st Maine Legislature, First Regular Session-2023, An Act to Strengthen Freedom of Speech Protections by Extending
Laws Against Strategic Lawsuits Against Public Participation
- 8 Id.
- 9 Id.

Endnote 1

LEWISTON DISTRICT COURT
APR 9 '25 AM 11:16

State of Maine
District Court
Southern Androscoggin Division

Leslie Grace C. Buot

- v -

Ian Simon R. Buenaventura

Case No. LEWDC-DWC-2025-00042

ORDER OF THE COURT

Defendant requests dismissal of the Complaint for Divorce. This Motion shall be addressed by a judge at or prior to a final hearing but not before the parties participate in mediation.

5/5/2025

Jms
Magistrate, Maine District Court

Special anti-SLAPP motion

I appreciate the time of the Court.

Respectfully, I request the Court to dismiss the divorce with prejudice. It is without merit. I deny there are "irreconcilable marital differences". It was filed to silence, dissuade, and punish the exercise of my constitutional rights (eg., 1st amendment) and human rights (eg., article 19).

Plaintiff knows that I have been unable to find a livelihood "on my own". She knows that there were petitions I filed. She knows that I guide our child in her education. Complaint has no legal basis, factual basis, reasoning, and evidence supporting its claim. Complaint was filed anyway.

Background.

I spoke against overtime shaving. There is surveillance on my family and I. Plaintiff confirmed, "Who wants to be surveilled?" Person 1 affirmed that there is surveillance. Person 2 verified that there is surveillance. Legal basis for claims in my petition are the U.S. constitution, Freedom of Information Act, Foreign Intelligence Surveillance Act, Administrative Procedure Act, Title VI of the Civil Rights Act of 1964, Federal Tort Claim Act, Racketeering Influence Corrupt Organization Act, and Geneva Conventions. "Retaliatory activities are "created, coordinated, and carried out" against me and my family members." One type of retaliation is that I am unable to find a livelihood "on my own".

Racketeering activities (eg., obstruction of justice) are zealously executed. "Mrs. Buenaventura was

Endnote 2

STATE OF MAINE

SUPREME JUDICIAL COURT
Sitting as the Law Court
Docket No. And-25-246

Leslie G.C. Buot

v.

ORDER DISMISSING APPEAL

Ian S.R. Buenaventura

Ian Buenaventura has appealed from an order of a family law magistrate referring to a District Court judge Buenaventura's special motion under the anti-SLAPP statute to dismiss this divorce action. The Clerk of the Law Court has docketed the appeal under Law Court docket number And-25-246.

The trial court has not yet entered any judgment against any party. As a result, not all claims against all parties have been resolved, and Quinn's appeal is interlocutory. See *Sanborn v. Sanborn*, 2005 ME 95, ¶ 4, 877 A.2d 1075. Although the denial of a special motion to dismiss is immediately appealable, see *Nader v. Me. Democratic Party*, 2013 ME 51, ¶ 12, 66 A.3d 571, the order that Buenaventura appeals from does not deny the special motion to dismiss but merely refers it to a District Court judge.

It is therefore ORDERED that Buenaventura's appeal is DISMISSED as interlocutory. Because the appeal is dismissed, the trial court need not transmit the record to the Law Court.

Dated: June 24, 2025

For the Court,

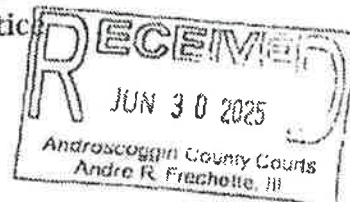


Andrew M. Horton
Associate Justice

RECEIVED

JUN 25 2025

Clerk's Office
Maine Supreme Judicial Court



Certificate of Service

I certify that on October 10, 2025, a copy of a Motion for Stay filed in the Supreme Judicial Court was sent via regular mail to :

Elyse B. Segovias, Esq.
Shukie & Segovias
179 Lisbon Street
P.O. Box 7120
Lewiston, Maine 04243-7120

I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct. This certificate was written in Plano, Texas on October 10, 2025.



Ian R. Buenaventura

Certificate of Service

I certify that on October 10, 2025, a digital copy of a Motion for Stay filed in the Supreme Judicial Court was sent through eFile to :

Lewiston District Court

I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct. This certificate was written in Plano, Texas on October 10, 2025.



Ian R. Buenaventura

Certificate of Service

I certify that on October 10, 2025, a Motion for Stay was sent via regular mail to :

Clerk
Supreme Judicial Court of Maine
205 Newbury Street, Room 139
Portland, Maine 04101-4125

I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct. This certificate was written in Plano, Texas on October 10, 2025.



Ian R. Buenaventura

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☐ Adult Signature Required		\$0.00
☐ Adult Signature Restricted Delivery		\$0.00
Postage		\$2.17
Total Postage and Fees		\$12.17

10/10/2025

Sent to Clerk, Supreme Judicial Court
205 Newbury Street, Room 139
Portland, Maine 04101-4125
PS Form 3800, April 2015 PSN 7530-02-000-1001 See Reverse for Instructions

Certificate of Service

I certify that on November 8, 2025, one (1) paper will be submitted to Supreme Judicial Court.

1. Motion for a Stay

Clerk
Supreme Judicial Court of Maine
205 Newbury Street, Room 139
Portland, Maine 04101-4125



Ian R. Buenaventura

Certificate of Service

I certify that on November 8, 2025, one (1) paper will be submitted to the recipient below through regular mail.

1. Motion for a Stay

Elyse B. Segovias, Esq.
179 Lisbon Street
P.O. Box 7120
Lewiston, Maine 04243-7120



Ian R. Buenaventura

Certificate of Service

I certify that on November 7, 2025, one (1) paper was submitted to the Supreme Court of the United States through regular mail.

1. Motion for a Stay

Honorable Scott S. Harris
Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20543



Ian R. Buenaventura