

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,  
Plaintiff,

CASE NO. 2018-CA-010270-O

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,  
Defendants.

---

**PLAINTIFF WILLIAM M. WINDSOR'S MOTION TO DISQUALIFY JUDGE  
JEFFREY L. ASHTON DUE TO DENIAL OF DUE PROCESS**

Comes Now, William M. Windsor ("Windsor" or "Plaintiff"), and asks that Jeffrey L. Ashton ("Judge Ashton") be disqualified from the above-entitled matter under the Due Process Clause of the Fifth Amendment to the U.S. Constitution, the Constitution of the State of Florida, the First, Fifth, Sixth, Eighth, and Fourteenth Amendments to the United States Constitution, Canons 2 and 3 of the Code of Judicial Conduct, all other relevant statutory and state and federal case law. Windsor moves for disqualification of Judge Jeffrey L. Ashton from all further proceedings in this case.

1. Judge Jeffrey L. Ashton has demonstrated to Windsor that he has a bias against pro se parties. BUT "... the right to file a lawsuit pro se is one of the most important rights under the constitution and laws." *Elmore v. McCammon* (1986) 640 F. Supp. 905.

2. Windsor has not been treated fairly by Judge Jeffrey L. Ashton. Judge Jeffrey L. Ashton has not demonstrated the impartiality required of a judge. He is demonstrating that he is a heartless person who has no business sitting in judgment on people.

3. Canon 2 of the Florida Code of Judicial Conduct ("CJC") provides: "A judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary."

Every person "has a constitutional and statutory right to an impartial and fair judge at all stages of the proceeding." *Liteky v U.S.*, 510 US 540 (1994).

### **FACTUAL BACKGROUND**

4. The factual background in this case is recited in the Affidavit of Prejudice and the affidavit attached thereto filed on 2/1/2021, referenced and incorporated herein.

5. On 3/25/2021, Judge Jeffrey L. Ashton entered an order without notice or an opportunity to be heard that is causing the Clerk of the Court to refuse to process Windsor's filings. [EXHIBIT A.]

6. On 3/25/2021, I requested subpoenas for testimony at the April 5, 2021 hearing on Order to Show Cause. [EXHIBITS B and C.] The Clerk of the Court has also refused to issue Subpoenas that Windsor needs for an Order to Show Cause. [EXHIBIT D.]

7. On 3/25/2021, Windsor was preparing to file a Motion to Strike the Order to Show Cause. Now it will not be filed.

8. On 3/10/2021, Windsor requested 16 hours for the Hearing on the Order to Show Cause, and Judge Jeffrey L. Ashton has granted 15 or 20 minutes. [EXHIBIT E.]

9. On 4/1/2021, Windsor attempted to file a Motion for Continuance of the April 5, 2021 Hearing. It will not be docketed because of Judge Jeffrey L. Ashton's void order on 3/25/2021. [EXHIBIT F.]

10. On 4/1/2021, Windsor attempted to file a Supplement to his Motion to Strike Pleadings and for Sanctions. It will not be docketed because of Judge Jeffrey L. Ashton's void order on 3/25/2021. [EXHIBIT G.]

11. Windsor has motions that have been ignored, including case dispositive motions.

12. Judge Jeffrey L. Ashton has demonstrated that there isn't an unbiased bone in his large body.

### ARGUMENT

#### WINDSOR IS ENTITLED TO THE COLD NEUTRALITY OF AN IMPARTIAL JUDGE.

13. Windsor is entitled to an impartial judge, and that isn't Judge Jeffrey Ashton.

"Every litigant is entitled to nothing less than the cold neutrality of an impartial judge. It is the duty of Courts to scrupulously guard this right and to refrain from attempting to exercise jurisdiction in any matter where his qualification to do so is seriously brought in question. *Hayslip v. Douglas*, 400 So.2d at 557 (quoting *State ex rel. Davis v. Parks*, 141 Fla. 516, 194 So. 613, 615 (1939)).

"We find that the motion and supporting affidavits were legally sufficient, and the proper procedure, in light of the serious allegation of bias, was for the judge to grant the motion. (*James v. Theobald*, 557 So.2d 591, 15 Fla. L. Weekly D215 (Fla.App. Dist.3 01/16/1990).)

"Where there is any legally sufficient basis, whether factually accurate or not, for a founded fear of possible prejudice to exist in the mind of a defendant, recusal is mandated." See, e.g., *Management Corporation of America, Inc. v. Grossman*, 396 So.2d 1169 (Fla. 3rd DCA 1981).

#### JUDGE JEFFREY L. ASHTON FAILED TO PROVIDE DUE PROCESS AND EQUAL PROTECTION TO WINDSOR.

4. Judge Jeffrey L. Ashton has violated Windsor's civil and constitutional rights under color of law.

"[t]rial before an 'unbiased judge' is essential to due process." *Johnson v. Mississippi*, 403 U.S. 212, 216 (1971); accord *Concrete Pipe & Prods. V. Constr. Laborers Pension Trust*, 508 U.S. 602, 617 (1993) (citation omitted). (See also *Levine v. United States*, 362

U.S. 610, 80 S.Ct. 1038 (1960), citing *Offutt v. United States*, 348 U.S. 11, 14, 75 S. Ct. 11, 13 (1954); *Mathews v. Eldridge*, 424 U.S. 319, 344 (1976); *Peters v. Kiff*, 407, U.S. 493, 502 (1972)

5. Windsor has just cause to believe that he cannot been given a fair trial.
6. The due process clauses of both the Florida and the United States Constitutions guarantee a party an impartial and disinterested tribunal in civil cases. *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242, 100 S.Ct. 1610, 1613 (1980).

Partiality in favor of the government may raise a defendant's due process concerns." *In re United States of America*, 441 F.3d at 66 (citing *In re Murchison*, 349 U.S. 133 (1955).

28 U.S.C. 155 may sometimes bar trial by judges who have no actual bias and who would do their very best to weigh the scales of justice equally between contending parties, but due process of law requires no less." *Taylor v. Hayes*, 418 U.S. 488, 501 (1974) (citations and quotation marks omitted). See also *Murchison*, 349 U.S. at 136.

7. Judge Jeffrey L. Ashton has effectively denied Windsor's rights of the equal protection under the law under Article VI of the Constitution.

**JUDGE JEFFREY L. ASHTON IS VIOLATING**  
**THE CONSTITUTIONAL RIGHTS OF WINDSOR.**

8. Judge Jeffrey L. Ashton has violated Windsor's Constitutional rights.
9. The Sixth Amendment provides the Constitutional right to self-representation. That right should be enjoyed without fear of harassment or judicial prejudice. Furthermore, no law, regulation, or policy should exist to abridge or surreptitiously extinguish that right. Pro Se Litigants have no less of a right to effective due process as those who utilize an attorney.
10. For due process and to secure the Constitutional rights of Windsor, judges may not take the law into their own hands. But this is precisely what Judge Jeffrey L. Ashton has done. He has ignored the law, ignored the facts, and claimed laws and rules provide something

that they do not provide, while abusing and disadvantaging Windsor.

11. For due process to be secured, the laws must operate alike upon all and not subject the individual to the arbitrary exercise of governmental power. (*Marchant v. Pennsylvania R.R.*, 153 U.S. 380, 386 (1894).) Judge Ashton has violated Windsor's rights by using his power to inflict his bias.

12. For due process, Windsor has the right to protections expressly created in statute and case law. Judge Jeffrey L. Ashton has violated Windsor's rights by using his power to ignore facts and the law.

13. Due process allegedly ensures that the government will respect all of a person's legal rights and guarantee fundamental fairness and justice. Judge Jeffrey L. Ashton's actions have violated Windsor's rights and denied justice.

14. Due process requires an established course for judicial proceedings designed to safeguard the legal rights of the individual. Action denying the process that is "due" is unconstitutional. Inherent in the expectation of due process is that the judge will abide by the rules. Judge Ashton has interfered with the process and violated rules for the purpose of damaging Windsor.

15. An inherent Constitutional right is the honesty of the judge. Judge Jeffrey L. Ashton has not been honest. Judge Ashton has violated Canon 2 and other Canons of the Code of Judicial Conduct.

16. Due process guarantees basic fairness and to make people feel that they have been treated fairly. Windsor has not been treated fairly.

17. Judge Jeffrey L. Ashton has effectively denied Windsor's rights of the equal protection under the law.

**FLORIDA HAS LONG RECOGNIZED AN IMPARTIAL JUDGE IS ESSENTIAL**

18. Florida has long claimed to have recognized that an impartial judge is essential.

"This Court has recognized the sensitivity and seriousness involved whenever the issue of judicial prejudice is raised. We have stated that:

"Prejudice of a judge is a delicate question to raise but when raised as a bar to the trial of a cause, if predicated on grounds with a modicum of reason, the judge against whom raised, should be prompt to recuse himself. No judge under any circumstances is warranted in sitting in the trial of a cause whose neutrality is shadowed or even questioned.

"... It is a matter of no concern what judge presides in a particular cause, but it is a matter of grave concern that justice be administered with dispatch, without fear or favor or the suspicion of such attributes. The outstanding big factor in every lawsuit is the truth of the controversy. Judges, counsel, and rules of procedure are secondary factors designed by the law as instrumentalities to work out and arrive at the truth of the controversy.

"The judiciary cannot be too circumspect, neither should it be reluctant to retire from a cause under circumstances that would shake the confidence of litigants in a fair and impartial adjudication of the issues raised. *Dickenson v. Parks*, 104 Fla. 577, 582-84, 140 So. 459, 462 (1932). This Court has also expressed the view that:

"Every litigant, including the State in criminal cases, is entitled to nothing less than the cold neutrality of an impartial judge." It is the duty of courts to scrupulously guard this right of the litigant and to refrain from attempting to exercise jurisdiction in any matter where his qualification to do so is seriously brought in question. The exercise of any other policy tends to discredit and place the judiciary in a compromising attitude which is bad for the administration of justice."

(*State ex rel. Mickle v. Rowe*, 100 Fla. 1382, 1385, 131 So. 331, 332 (1930).)

WHEREFORE, having now filed this Motion to Disqualify, Windsor respectfully requests as follows:

- (1) that Windsor's Motion to Disqualify Judge Jeffrey L. Ashton is granted;
- (2) that this Motion be referred to another judge for a hearing;
- (3) that the Court issue an order disqualifying Judge Jeffrey L. Ashton;
- (4) that the Court reconsider or strike all orders by Judge Munyon, Judge Kest, and Judge Jeffrey L. Ashton; and
- (5) that the Court grant such other and further relief as justice requires.

Submitted this 1st day of April, 2021.



**William M. Windsor**

100 East Oak Terrace Drive, Unit B3

Leesburg, Florida 34748

352-577-9988

windsorinmontana@yahoo.com

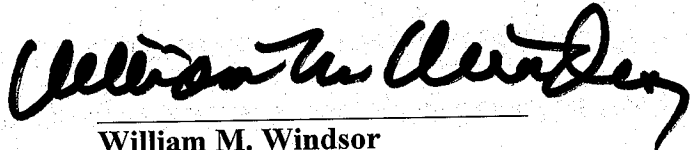
billwindsor1@outlook.com

**VERIFICATION**

The facts alleged in the foregoing are true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 1st day of April, 2021,



**William M. Windsor**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Electronic Mail

to:

David I. Wynne and Scotty Astrin  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 1st day of April, 2021.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
windsorinmontana@yahoo.com  
billwindsor1@outlook.com

# EXHIBIT

# A

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

2018-CA-010270-O

WILLIAM WINDSOR

Plaintiff(s),

vs.

ROBERT KEITH LONGEST

Defendant(s).

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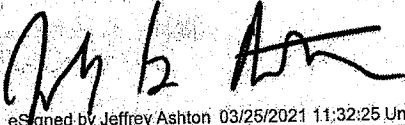
**INTERIM ORDER ON PRO SE FILINGS**

WHEREAS, the Court, on March, 2 2021 set for hearing an Order to Show Cause to Plaintiff as the why the Court should not grant Defendant's Emergency Motion to Require Pro Se Plaintiff William Windsor's Submissions to the Court be Reviewed and Signed By A Member of the Florida Bar on April 5, 2021.

WHEREAS, since the issuance of the Order to Show Cause, Plaintiff has filed twenty six items with the Clerk of Court in this matter. Among the motions, was a request for sixteen hours of hearing time on the Order to Show Cause. Among the matters filed, are item described as affidavits or exhibits totaling one thousand six hundred and seventy pages.

The Clerk is hereby directed to decline to file any further documents by the pro se Plaintiff unless they contain a certificate by a member of the Florida Bar that have reviewed the matter and that the filing is appropriate. This Order shall remain in effect until close of business April, 5 2021.

DONE AND ORDERED in Chambers, at Orlando, Orange County, Florida, on 25th day of March, 2021.

  
eSigned by Jeffrey Ashton 03/25/2021 11:32:25 UnMPVKWu

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Jeffrey L Ashton  
Circuit Judge

That the foregoing was filed with the Clerk of the Court this 25th day of March, 2021 by using the Florida Courts E-Filing Portal System. Accordingly, a copy of the foregoing is being served on this day to all attorney(s)/interested parties identified on the ePortal Electronic Service List, via transmission of Notices of Electronic Filing generated by the ePortal System.

# EXHIBIT

## B

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

## **SUBPOENA DUCES TECUM FOR COURT TESTIMONY**

THE STATE OF FLORIDA:

**TO: Scott L. Astrin**

YOU ARE COMMANDED to appear before Judge Jeffrey L. Ashton via ZOOM.

The testimony will be held on April 5, 2021 at 10:30 a.m. You will be testifying in this action, and you are to have with you at that time and place the documents on Exhibit A hereto.

You are subpoenaed to appear by William M. Windsor, and unless excused from this subpoena by William M. Windsor or the court, you must respond to this subpoena as directed.

DATE: \_\_\_\_\_

\_\_\_\_\_  
DEPUTY CLERK

Name: \_\_\_\_\_

Party: William M. Windsor  
Address: 100 East Oak Terrace Drive, Unit B3, Leesburg, Florida 34748  
Phone: 352-805-7887 -- Email: billwindsor1@outlook.com

Any minor subpoenaed for testimony has the right to be accompanied by a parent or guardian at all times during the taking of testimony notwithstanding the invocation of the rule of sequestration of section 90.616, Florida Statutes, except on a showing that the presence of a parent or guardian is likely to have a material, negative impact on the credibility or accuracy of the minor's testimony, or that the interests of the parent or guardian are in actual or potential conflict with the interests of the minor.

**If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact [identify applicable court personnel by name, address, and telephone number] at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.**

## EXHIBIT A

The materials to be produced are to be produced the day before the deposition to William M. Windsor, 100 East Oak Terrace Drive, Unit B3, Leesburg, Florida 34748 or bill@billwindsor.com. Scott L. Astrin must produce each separate item requested for production in a file folder marked to show the date requested and the item number of the request. Scott L. Astrin must comply with Florida Rules of Civil Procedure Rule 1.280 (B) (6) if making a claim of privilege; any such claim must describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.

A paper copy of each of these documents is also to be provided to Judge Jeffrey L. Ashton as per the instructions of Keitra Davis.

1. All documents relating or referring to, or evidencing, reflecting, or constituting communication to William M. Windsor ("WINDSOR").
2. All documents relating or referring to, or evidencing, reflecting, or constituting communication from WINDSOR.
3. All documents relating or referring to, or evidencing, reflecting, or constituting communication to or from Russell E. Klemm, Christine Praria, anyone with Clayton & McCulloh, Maura Krause, anyone with Goldberg Segalla, Christina Bredahl Gierke, or anyone with Cole, Scott & Kissane.
4. All documents relating or referring to, or evidencing, reflecting, or constituting communication or information about WINDSOR.
5. All documents relating or referring to, or evidencing, reflecting, or constituting information about your residence address.

6. All documents relating or referring to, or evidencing, reflecting, or constituting information about your cell phone number(s).

7. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR between the hours of midnight and 6 am.

8. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR that said "I will file a Motion for Sanctions."

9. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR that said "I will file a Motion for Sanctions" when WINDSOR did not thereafter seek sanctions.

10. All documents relating or referring to, or evidencing, reflecting, or constituting anything relative to your college and law school education.

11. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that were not filed in response to filings by the DEFENDANTS or necessitated by filings by the DEFENDANTS.

12. All documents relating or referring to, or evidencing, reflecting, or constituting the Florida Rules of Civil Procedure.

13. All documents relating or referring to, or evidencing, reflecting, or constituting the Florida Rules of Professional Conduct.

14. All documents relating or referring to, or evidencing, reflecting, or constituting statutes or rules that prohibit a party from making claims about a party or an attorney under oath under penalty of perjury.

15. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that disparaged the judicial system.

16. All documents relating or referring to, or evidencing, reflecting, or constituting case law to support that the following, if true, is grounds to require WINDSOR to have his pleadings signed by a member of the Florida BAR:

"During the past eleven (11) months, Mr. Windsor has sent voluminous emails and filed numerous pleadings and associated documents, which number well in excess of 2,500 pages. Many of these emails and pleadings are filed after business hours, between the hours of midnight and 6 a.m., and on the weekends. The majority of the emails and pleadings filed by Mr. Windsor are harassing in nature, have no legal merit, have already been ruled on several times, question our clients character as well as the attorneys of records David Wynne and Scott Astrin, and disparage the presiding Judge and the judicial system. In addition, the majority of Mr. Windsor's emails end with the ongoing threat "I will file a Motion for Sanctions" if he does not get his way. As set forth above, Mr. Windsor began representing himself in March 2020. In the past eleven (11) months, Mr. Windsor has spent his time filing at best fifty motions and pleadings attaching voluminous documents, sometimes over a 1000 pages. A majority of the Motions are repetitive seeking reconsideration. The Court has denied these same Motions several times. In addition, Mr. Windsor has filed Motions to Recuse the presiding Judge three (3) times to include your Honor. Furthermore, he has a pending action in the 5th DCA wherein he has filed a Writ of Prohibition seeking your Honor's recusal and additional affirmative relief. The first Writ of Prohibition was summarily denied without hearing. Despite the denials of his Motions, Mr. Windsor continues to inundate the court and litigants with voluminous filings. This includes at least 10 filings over the past week."

17. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that are repetitive.

18. All documents relating or referring to, or evidencing, reflecting, or constituting proof of meeting and conferring prior to filings by the DEFENDANTS in this Case.

19. All documents relating or referring to, or evidencing, reflecting, or constituting affidavits filed by a DEFENDANT in this Case.

20. All documents relating or referring to, or evidencing, reflecting, or constituting affidavits filed by an attorney in this Case.

21. All documents relating or referring to, or evidencing, reflecting, or constituting verifications of motions and pleadings filed by an attorney in this Case.

22. All documents relating or referring to, or evidencing, reflecting, or constituting orders in this case to indicate WINDSOR has done anything improper in this Case.

23. All documents relating or referring to, or evidencing, reflecting, or constituting motions in this Case to disqualify that were not supported by Florida Statutes, the Rules, or the Constitutions of Florida and the United States of America.

24. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that are repetitive and not allowed under the Florida Rules of Civil Procedure.

25. All documents relating or referring to, or evidencing, reflecting, or constituting the Billing Records applicable to this Case.

26. All documents relating or referring to, or evidencing, reflecting, or constituting WINDSOR Motions in this Case that were not supported by legal authority.

27. All documents relating or referring to, or evidencing, reflecting, or constituting WINDSOR Motions in this Case that were not responses to the DEFENDANTS, motions for continuance or stay, motions for hearings or conferences, .

28. All documents relating or referring to, or evidencing, reflecting, or constituting DEFENDANTS' Motions in this Case that did not identify a specific statute or rule as legal authority.

29. All documents relating or referring to, or evidencing, reflecting, or constituting complaints made against Scott L. Astrin, David Wynne, and/or the Law Office of Scott L. Astrin.

30. All documents relating or referring to, or evidencing, reflecting, or constituting a counterclaim filed by a DEFENDANT in this Case.

31. All documents relating or referring to, or evidencing, reflecting, or constituting communication with anyone regarding an Order to Show Cause in this Case.

32. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Georgia.

33. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Montana.

34. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Texas.

35. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Florida.

#### **I. Definitions**

The following terms mean:

(a) "You" or "your" -- The person(s) to whom this REQUEST is addressed and all other persons acting or purporting to act on said person's behalf.

(b) "Document" -- Includes, without limitation, writings, emails (whether printed or not), agreements, contracts, and printed matter of every kind and description; data stored on a computer hard disk or other memory card, photographs and drawings; notes and records of any oral communications; e-mails and recordings (tape, disc or other) of oral communications.

(c) "Person" or "persons" -- Any individual, corporation, partnership, joint venture, firm, association, proprietorship, agency, board, authority, commission or any other entity.

(d) "Communicate" or "communication" -- Includes every manner or means of disclosure, transfer, or exchange and every disclosure, transfer or exchange of information,

whether orally or by documents or whether face-to-face or by telephone, mail, personal delivery or otherwise.

(e) "Or" -- Shall be construed either conjunctively or disjunctively to bring within the scope of this REQUEST any information which might otherwise be construed to be outside their scope.

(f) "Complaint" -- The Complaint filed in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida assigned Case No. 2018-CA-010270-O.

(g) "Case" -- The Case filed in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida assigned Case No. 2018-CA-010270-O.

(h) "Windsor" -- a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(i) "Plaintiff" -- William M. Windsor, a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(j) "Defendants" -- ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., a Foreign Limited Liability Company

(k) "WYNNE" or "DAVID WYNNE" is an employee of Law Offices Scott L. Astrin.

(l) "ASTRIN" or "SCOTT ASTRIN" or "SCOTT L. ASSTRIN" is an employee of Law Offices Scott L. Astrin.

# EXHIBIT

# C

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

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Defendants.

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THE STATE OF FLORIDA:

**TO: David Wynne**

YOU ARE COMMANDED to appear before Judge Jeffrey L. Ashton via ZOOM.

The testimony will be held on April 5, 2021 at 10:30 a.m. You will be testifying in this  
action, and you are to have with you at that time and place the documents on Exhibit A hereto.

You are subpoenaed to appear by William M. Windsor, and unless excused from this  
subpoena by William M. Windsor or the court, you must respond to this subpoena as directed.

DATE: \_\_\_\_\_

\_\_\_\_\_  
DEPUTY CLERK

Name: \_\_\_\_\_

Party: William M. Windsor

Address: 100 East Oak Terrace Drive, Unit B3, Leesburg, Florida 34748

Phone: 352-805-7887 -- Email: billwindsor1@outlook.com

Any minor subpoenaed for testimony has the right to be accompanied by a parent or guardian at all times during the taking of testimony notwithstanding the invocation of the rule of sequestration of section 90.616, Florida Statutes, except on a showing that the presence of a parent or guardian is likely to have a material, negative impact on the credibility or accuracy of the minor's testimony, or that the interests of the parent or guardian are in actual or potential conflict with the interests of the minor.

**If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact [identify applicable court personnel by name, address, and telephone number] at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.**

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A paper copy of each of these documents is also to be provided to Judge Jeffrey L. Ashton as per the instructions of Keitra Davis.

The materials to be produced under the subpoena are:

1. All documents relating or referring to, or evidencing, reflecting, or constituting communication to William M. Windsor ("WINDSOR").
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3. All documents relating or referring to, or evidencing, reflecting, or constituting communication to or from Russell E. Klemm, Christine Praria, anyone with Clayton & McCulloh, Maura Krause, anyone with Goldberg Segalla, Christina Bredahl Gierke, or anyone with Cole, Scott & Kissane.
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15. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that disparaged the judicial system.

16. All documents relating or referring to, or evidencing, reflecting, or constituting case law to support that the following, if true, is grounds to require WINDSOR to have his pleadings signed by a member of the Florida BAR:

“During the past eleven (11) months, Mr. Windsor has sent voluminous emails and filed numerous pleadings and associated documents, which number well in excess of 2,500 pages. Many of these emails and pleadings are filed after business hours, between the hours of midnight and 6 a.m., and on the weekends. The majority of the emails and pleadings filed by Mr. Windsor are harassing in nature, have no legal merit, have already been ruled on several times, question our clients character as well as the attorneys of records David Wynne and Scott Astrin, and disparage the presiding Judge and the judicial system. In addition, the majority of Mr. Windsor’s emails end with the ongoing threat “I will file a Motion for Sanctions” if he does not get his way. As set forth above, Mr. Windsor began representing himself in March 2020. In the past eleven (11) months, Mr. Windsor has spent his time filing at best fifty motions and pleadings attaching voluminous documents, sometimes over a 1000 pages. A majority of the Motions are repetitive seeking reconsideration. The Court has denied these same Motions several times. In addition, Mr. Windsor has filed Motions to Recuse the presiding Judge three (3) times to include your Honor. Furthermore, he has a pending action in the 5<sup>th</sup> DCA wherein he has filed a Writ of Prohibition seeking your Honor’s recusal and additional affirmative relief. The first Writ of Prohibition was summarily denied without hearing. Despite the denials of his Motions, Mr. Windsor continues to inundate the court and litigants with voluminous filings. This includes at least 10 filings over the past week.”

17. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that are repetitive.

18. All documents relating or referring to, or evidencing, reflecting, or constituting proof of meeting and conferring prior to filings by the DEFENDANTS in this Case.

19. All documents relating or referring to, or evidencing, reflecting, or constituting affidavits filed by a DEFENDANT in this Case.

20. All documents relating or referring to, or evidencing, reflecting, or constituting affidavits filed by an attorney in this Case.

21. All documents relating or referring to, or evidencing, reflecting, or constituting verifications of motions and pleadings filed by an attorney in this Case.

22. All documents relating or referring to, or evidencing, reflecting, or constituting orders in this case to indicate WINDSOR has done anything improper in this Case.

23. All documents relating or referring to, or evidencing, reflecting, or constituting motions in this Case to disqualify that were not supported by Florida Statutes, the Rules, or the Constitutions of Florida and the United States of America.

24. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that are repetitive and not allowed under the Florida Rules of Civil Procedure.

25. All documents relating or referring to, or evidencing, reflecting, or constituting the Billing Records applicable to this Case.

26. All documents relating or referring to, or evidencing, reflecting, or constituting WINDSOR Motions in this Case that were not supported by legal authority.

27. All documents relating or referring to, or evidencing, reflecting, or constituting WINDSOR Motions in this Case that were not responses to the DEFENDANTS, motions for continuance or stay, motions for hearings or conferences, .

28. All documents relating or referring to, or evidencing, reflecting, or constituting DEFENDANTS' Motions in this Case that did not identify a specific statute or rule as legal authority.

29. All documents relating or referring to, or evidencing, reflecting, or constituting complaints made against Scott L. Astrin, David Wynne, and/or the Law Office of Scott L. Astrin.

30. All documents relating or referring to, or evidencing, reflecting, or constituting a counterclaim filed by a DEFENDANT in this Case.

31. All documents relating or referring to, or evidencing, reflecting, or constituting communication with anyone regarding an Order to Show Cause in this Case.

32. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Georgia.

33. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Montana.

34. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Texas.

35. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Florida.

## **I. Definitions**

The following terms mean:

(a) "You" or "your" -- The person(s) to whom this REQUEST is addressed and all other persons acting or purporting to act on said person's behalf.

(b) "Document" -- Includes, without limitation, writings, emails (whether printed or not), agreements, contracts, and printed matter of every kind and description; data stored on a computer hard disk or other memory card, photographs and drawings; notes and records of any oral communications; e-mails and recordings (tape, disc or other) of oral communications.

(c) "Person" or "persons" -- Any individual, corporation, partnership, joint venture, firm, association, proprietorship, agency, board, authority, commission or any other entity.

(d) "Communicate" or "communication" -- Includes every manner or means of disclosure, transfer, or exchange and every disclosure, transfer or exchange of information, whether orally or by documents or whether face-to-face or by telephone, mail, personal delivery or otherwise.

(e) "Or" -- Shall be construed either conjunctively or disjunctively to bring within the scope of this REQUEST any information which might otherwise be construed to be outside their scope.

(f) "Complaint" -- The Complaint filed in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida assigned Case No. 2018-CA-010270-O.

(g) "Case" -- The Case filed in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida assigned Case No. 2018-CA-010270-O.

(h) "Windsor" -- a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(i) "Plaintiff" -- William M. Windsor, a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(j) "Defendants" -- ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., a Foreign Limited Liability Company

(k) "WYNNE" or "DAVID WYNNE" is an employee of Law Offices Scott L. Astrin.

(l) "ASTRIN" or "SCOTT ASTRIN" or "SCOTT L. ASSTRIN" is an employee of Law Offices Scott L. Astrin.

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**AMENDED MOTION FOR 16-HOUR HEARING**

COMES NOW William M. Windsor ("Windsor" or "Plaintiff"), and files this Amended  
Motion for 16-hour Hearing and shows the Court as follows:

1. This Court has scheduled a one-hour hearing for April 6, 2021.
2. Windsor somehow did not receive the Order to Show Cause dated 3/2/2021 until  
a few minutes ago. He has been ordered to appear and show cause why the Court should not  
grant the relief requested in Defendant's motion to require Plaintiff's submissions and/or  
pleadings to the Court be reviewed, approved, and signed by a member of the Florida Bar.
3. It will take Windsor 16 hours to present his evidence. He has also requested  
Subpoenas from the Clerk of the Court.
4. If Windsor loses the motion, he will lose this case and the anticipated \$3,500,000  
jury award.
5. Upon information and belief, this seems to be the intent of Jeffrey L. Ashton, an  
attorney who appears to have a special arrangement with the attorneys for the DEFENDANTS.

6. Windsor has requested 16 hours to be able to present the evidence necessary to prove the motion is a sham, frivolous pleading and to have a record sufficient to show appellate courts that any ruling against Windsor will be due to what Windsor believes is the blatant dishonesty of Judge Jeffrey L. Ashton.

7. Windsor also requests an honest judge to handle the hearing.

**PRAYER FOR RELIEF**

8. Wherefore, Windsor moves the Court to schedule 16 hours for the hearing; issue an order to show cause; schedule an honest judge (not Jeffrey L. Ashton) to hear the matter; and grant such other and further relief as is deemed just and proper.

This 10th day of March, 2021.

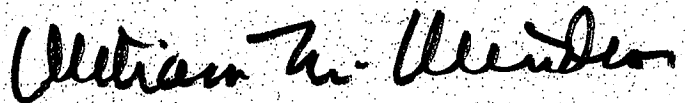


William M. Windsor

**VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

This 10th day of March, 2021,



William M. Windsor

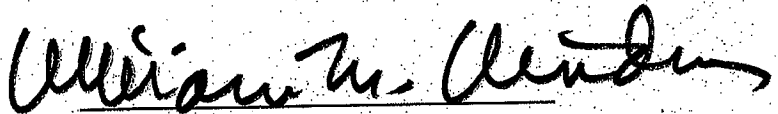
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Electronic Mail

to:

David I. Wynne  
Law Offices of Scott L. Asstrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.asstrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 10th day of March, 2021.



William M. Windsor  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
billwindsor1@outlook.com  
bill@billwindsor.com

# EXHIBIT D

## Case Header

Case Type: CA - Auto Negligence  
Date Filed: 9/20/2018  
Location: Div 37  
UCN: 482018CA010270A001OX  
Judge: Jeffrey L Ashton  
Status: Pending  
Citation Number:  
Compliance Date:

## Parties

| Name  | Type      | Attorney     | Atty Phone   |
|---|-----------|--------------|--------------|
| WILLIAM WINDSOR                                   | Plaintiff | JASON HERMAN | 407-203-6580 |
| ROBERT KEITH LONGEST                              | Defendant | DAVID WYNNE  | 813-218-3118 |
| BOISE CASCADE BUILDING MATERIALS DISTRIBUTION LLC | Defendant | DAVID WYNNE  | 813-218-3118 |

## Charge Details

| Offense Date | Charge | Plea | Arrest | Disposition | Sentence |
|--------------|--------|------|--------|-------------|----------|
|--------------|--------|------|--------|-------------|----------|

## Docket Events

Document Status: = Public = VOR = Confidential = Sealed = Request Pending.

| Date      | Description   | Pages | Doc | Request Doc |
|-----------|---|-------|-----|-------------|
| 3/30/2021 | Service Document Unable to be Issued<br>Comments: Subpoena Filed 03/25/2021 Not Issued - Per Order Interim on Pro Se Filings filed on 03/25/2021 - Documents did not contain a Certificate by a member of the Florida Bar to explained document was reviewed. |       |     |             |
| 3/26/2021 | Comments: on procedures for show cause hearing  | 2     |     |             |
| 3/25/2021 | Comments: INTERIM ORDER ON PRO SE FILINGS   | 2     |     |             |
| 3/24/2021 | Comments: ON PLAINTIFF S MOTION TO STRIKE ANSWER AND AMENDED ANSWER AND PLAINTIFF S EMERGENCY MOTION TO STRIKE STRANGE HIDDEN DOCKET ENTRY AND MEMORANDUM OF LAW  | 2     |     |             |
| 3/24/2021 |   | 1     |     |             |
| 3/18/2021 |   | 5     |     |             |

| Date      | Description                              | Pages | Doc | Request Doc |
|-----------|--|-------|-----|-------------|
| 3/18/2021 |  | 3     |     |             |
| 3/18/2021 |  | 3     |     |             |
| 3/18/2021 | Comments: REGARDING PRO SE VERIFICATIONS | 3     |     |             |

### Hearings

| Date      | Hearing  | Time     | Location             | Pages | Doc |
|-----------|--|----------|----------------------|-------|-----|
| 2/2/2021  | Motion - Ashton, Jeffrey L (Actual: Ashton, Jeffrey L)                         | 11:00 AM | Hearing Room 1100.01 |       |     |
| 9/29/2020 | Motion - Kest, John Marshall (Actual: Kest, John Marshall)                     | 9:00 AM  | Room 1700-B          |       |     |
| 9/21/2020 | Case Management Conference - Kest, John Marshall (Actual: Kest, John Marshall) | 9:00 AM  | Room 1700-B          |       |     |
| 9/14/2020 | CANCELED-Cancelled Evidentiary Hearing - Munyon, Lisa T.                       | 1:30 PM  |                      |       |     |
| 8/25/2020 | CANCELED-Cancelled Motion - Munyon, Lisa T.                                    | 3:30 PM  |                      |       |     |
| 8/19/2020 | Hearing - Munyon, Lisa T. (Actual: Munyon, Lisa T.)                            | 10:30 AM |                      |       |     |
| 7/7/2020  | Hearing - Munyon, Lisa T. (Actual: Munyon, Lisa T.)                            | 3:00 PM  | Hearing Room 2000.02 |       |     |

### Financial

| Date      | Description            | Payer              | Amount  |
|-----------|------------------------|--------------------|---------|
| 9/20/2018 | Transaction Assessment |                    | 420.00  |
| 9/20/2018 | Payment                | Daniel J Newlin PA | -420.00 |
| 3/12/2021 | Transaction Assessment |                    | 4.00    |
| 3/12/2021 | Payment                | William M Windsor  | -4.00   |
| 3/25/2021 | Transaction Assessment |                    | 4.00    |
| 3/25/2021 | Payment                | William M Windsor  | -4.00   |

### Bonds

| Description | Status Date | Bond Status | Image | Amount |
|-------------|-------------|-------------|-------|--------|
|-------------|-------------|-------------|-------|--------|

# Warrants



| Number | Status Description | Issue Date | Service Date | Recall Date | Expiration Date | Warrant Type |
|--------|--------------------|------------|--------------|-------------|-----------------|--------------|
|--------|--------------------|------------|--------------|-------------|-----------------|--------------|

# EXHIBIT

# E

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**AMENDED MOTION FOR 16-HOUR HEARING**

COMES NOW William M. Windsor ("Windsor" or "Plaintiff"), and files this Amended Motion for 16-hour Hearing and shows the Court as follows:

1. This Court has scheduled a one-hour hearing for April 6, 2021.
2. Windsor somehow did not receive the Order to Show Cause dated 3/2/2021 until a few minutes ago. He has been ordered to appear and show cause why the Court should not grant the relief requested in Defendant's motion to require Plaintiff's submissions and/or pleadings to the Court be reviewed, approved, and signed by a member of the Florida Bar.
3. It will take Windsor 16 hours to present his evidence. He has also requested Subpoenas from the Clerk of the Court.
4. If Windsor loses the motion, he will lose this case and the anticipated \$3,500,000 jury award.
5. Upon information and belief, this seems to be the intent of Jeffrey L. Ashton, an attorney who appears to have a special arrangement with the attorneys for the DEFENDANTS.

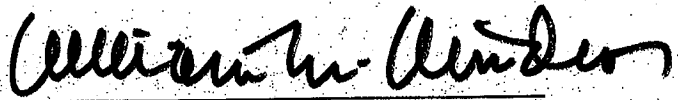
6. Windsor has requested 16 hours to be able to present the evidence necessary to prove the motion is a sham, frivolous pleading and to have a record sufficient to show appellate courts that any ruling against Windsor will be due to what Windsor believes is the blatant dishonesty of Judge Jeffrey L. Ashton.

7. Windsor also requests an honest judge to handle the hearing.

**PRAYER FOR RELIEF**

8. Wherefore, Windsor moves the Court to schedule 16 hours for the hearing; issue an order to show cause; schedule an honest judge (not Jeffrey L. Ashton) to hear the matter; and grant such other and further relief as is deemed just and proper.

This 10th day of March, 2021.

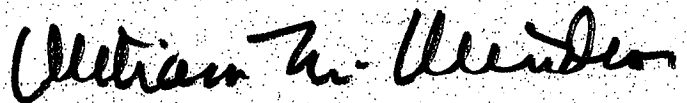


William M. Windsor

**VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

This 10th day of March, 2021,



William M. Windsor

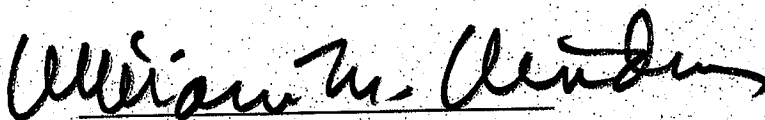
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Electronic Mail

to:

David I. Wynne  
Law Offices of Scott L. Asstrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.asstrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 10th day of March, 2021.



William M. Windsor  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
billwindsor1@outlook.com  
bill@billwindsor.com

# EXHIBIT F

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,  
Plaintiff,

CASE NO. 2018-CA-010270-O

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,  
Defendants.

---

**WILLIAM M. WINDSOR'S MOTION**  
**FOR CONTINUANCE OF THE APRIL 5, 2021 HEARING**

COMES NOW the Plaintiff, William M. Windsor ("Windsor" or "Plaintiff"), who files  
this Motion for Continuance of the April 5, 2021 Hearing. Windsor shows the Court as follows:

1. Windsor has been preparing the Exhibits for the April 5, 2021 Hearing, but he cannot meet the Court's deadline for early submission.
2. Windsor has over 1,000 exhibits. After Bates numbering, he has to manually apply an electronic Exhibit Sticker to each exhibit and type in the number. This is taking days.
3. Windsor is having emergency dental work done on April 1, 2021 with Dr. Stephanie McRae in Tavares, Florida. Windsor will be losing his two front teeth. He will be sedated, and the procedures will require several hours.
4. The Judicial Assistant just advised Windsor that the courthouse is closed on April 2, 2021.
5. Windsor asks for a continuance. This hearing needs to be set so that Windsor's submission of evidence will be timely.

**PRAYER FOR RELIEF**

6. Wherefore, Windsor moves the Court for an order continuing the April 5, 2021 Hearing to a date and time so that Windsor's submission of evidence will be timely or ordering that Windsor may submit the evidence by April 5, 2021 as soon as the courthouse reopens after Easter; and granting such other and further relief as is deemed just and proper.

This 1st day of April, 2021,



William M. Windsor

**VERIFICATION**

The facts alleged in the foregoing are true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 1st day of April, 2021,



William M. Windsor

**CERTIFICATE OF SERVICE**

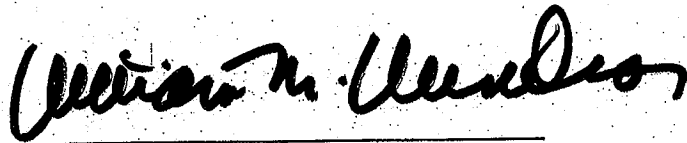
I HEREBY CERTIFY that a copy of the foregoing has been furnished by Electronic Mail

to:

David I. Wynne and Scott L. Astrin  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602

david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559  
813-218-3110  
Fax: 813-649-8362

This 1st day of April, 2021,

A handwritten signature in black ink, reading "William M. Windsor", written over a horizontal line.

**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
windorinmontana@yahoo.com  
billwindsor1@outlook.com

# EXHIBIT

# G

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**PLAINTIFF'S SUPPLEMENTAL MOTION TO STRIKE PLEADINGS**  
**AND AWARD SANCTIONS**

COMES NOW, William M. Windsor ("Windsor" or "Plaintiff"), and files Plaintiff's  
Supplemental Motion to Strike Pleadings and Award Sanctions. Pursuant to Rules 2.515, 2.516,  
and 2.520 of the Florida Rules of Judicial Administration; and the Court' Inherent Powers.  
Windsor shows the Court as follows:

1. On March 17, 2021, Windsor filed a Verified Motion to Strike Pleadings and  
Award Sanctions, referenced and incorporated herein.
2. New information has just been obtained.
3. Hillsborough County Deputy Sheriff Luz Guadalupe has issued a report stating  
that Scott L. Astrin told her by telephone that the office at 100 Tampa Street N #2605, Tampa  
"has been closed for over a year and will not give home address." [EXHIBIT A.]
4. The Notice of Appearance filed by Scott L. Astrin on 8/19/2020 in this case  
shows his address to be 100 Tampa Street N #2605, Tampa. A review of every filing by Scott L.  
Astrin and David I. Wynne show this bogus address. [EXHIBIT B.] [DOCKET.]

5. Windsor's mail to the "Law Offices of Scott L. Astrin" were returned as "unknown" as early as June 2020. Windsor asked Astrin about this, and he failed to disclose that the office was closed. [EXHIBIT C, EXHIBIT D.] He provided no other address. [EXHIBIT E.]

6. False information is also being provided by Scott L. Astrin and David I. Wynne to the Florida Bar Association. [EXHIBIT F.] [EXHIBIT G.] Regina Franco-Murphey [EXHIBIT H], Richard Heinzman [EXHIBIT I], Katrina Herrera [EXHIBIT J], and Ashley Nicole Rosenbaum [EXHIBIT K] have also provided fake addresses to the Florida Bar Association and the courts.

7. Scott L. Astrin and David I. Wynne have been intentionally filing false information with the Court. This fraud has made it impossible for Windsor to serve Scott L. Astrin and David I. Wynne with subpoenas, and this has caused Windsor's mail to go undelivered.

8. Scott L. Astrin and David I. Wynne have given a false address with intent to obstruct the due execution of the law.

Florida Statute 843.03 Obstruction by disguised person.—Whoever in any manner disguises himself or herself with intent to obstruct the due execution of the law, or with the intent to intimidate, hinder, or interrupt any officer, beverage enforcement agent, or other person in the legal performance of his or her duty or the exercise of his or her rights under the constitution or laws of this state, whether such intent is effected or not, shall be guilty of a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083. [emphasis added.]

9. See *Williams v. State*, 459 So.2d 319 (Fla.App. Dist.5 06/07/1984): "Whoever in any manner knowingly gives a false name or a false address with intent to obstruct the due execution of the law, or with the intent to intimidate, hinder, or interrupt any law enforcement officer or beverage enforcement agent in the legal performance of his duty under the constitution or laws of this state, whether such obstruction is effected or not, is guilty of a

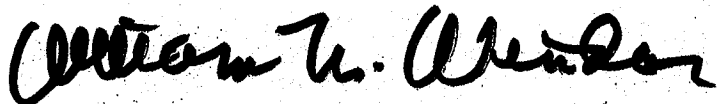
misdemeanor of the first degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.”

**[emphasis added.]**

### **PRAYER FOR RELIEF**

Wherefore, the Plaintiff applies to this Court for an order granting this motion; ordering that all pleadings of the attorneys for the Defendants containing the false addresses are stricken; ordering that all orders where the stricken pleadings were considered be void; ordering that the Plaintiff is to be paid a sanction of at least \$1,000 per violation in cash; referring Scott L. Astrin, David I. Wynne, Regina Franco-Murphey, Richard Heinzman, Katrina Herrera, and Ashley Nicole Rosenbaum to the Florida Bar Association; referring Scott L. Astrin, David I. Wynne, Regina Franco-Murphey, Richard Heinzman, Katrina Herrera, and Ashley Nicole Rosenbaum to the State Attorney; and granting such other and further relief as is deemed just and proper.

Dated in Leesburg, Florida this 1st day of April, 2021,




**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
windorinmontana@yahoo.com  
billwindsor1@outlook.com

**CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY that I have conferred with the attorneys for the Defendants by sending an email about this issue. There was no response.

This 1st day of April, 2021,



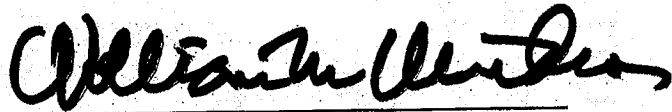
**William M. Windsor**

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Email:

David I. Wynne and Scott L. Astrin -- Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605, Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com, regina.murphey@aig.com,  
richard.heinzman@aig.com, katrina.herrera@aig.com, ashley.rosenbaum@aig.com  
813-526-0559 - 813-218-3110 -- Fax: 813-649-8362

This 1st day of April, 2021,



**William M. Windsor**

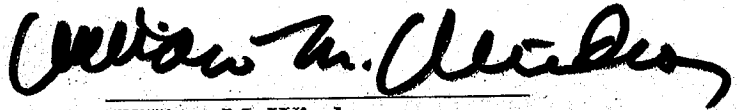
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
windorinmontana@yahoo.com  
billwindsor1@outlook.com

**VERIFICATION**

The facts alleged in the foregoing are true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 1st day of April, 2021,

A handwritten signature in black ink, appearing to read "William M. Windsor", written in a cursive style.

**William M. Windsor**

# EXHIBIT

## A



**HILLSBOROUGH COUNTY  
SHERIFF'S OFFICE  
CIVIL PROCESS SECTION**

CIVIL # HS 2021-7587

CASE # 2018-CA-010270-0  
Court : CIRCUIT COURT CIVIL

DATE/TIME RECEIVED : 03/22/2021 12:34 COURT DATE : 03/29/2021 DATE RETURNED : 03/25/2021

AGENCY : ORANGE COUNTY

TYPE OF PROCESS : SUBPOENA, NOTICE

WILLIAM WINDSOR  
100 EAST OAK TERRACE DR #UNIT B3  
LEESBURG, FL 34748

HILLSBOROUGH COUNTY, FLORIDA

**PLAINTIFF(S)**

WILLIAM WINDSOR

**DEFENDANT(S)**

BOISE CASCADE BUILDING ETAL  
ROBERT KEITH LONGEST

**SERVE TO(S)**

SCOTT L ASTRIN

**ATTEMPT TO SERVE #1**

**SUBJECT:** ASTRIN, SCOTT, L  
**DATE/TIME:** 03/24/2021 11:19  
**BY:** 4658 - GUADALUPE, LUZ  
**ADDRESS:** 100 TAMPA ST N #2605, TAMPA  
**REMARKS:** NO RESPONSE AT DOOR AND SIGN STATES "THERE IS CURRENTLY NO STAFF ONSITE. OFFICE IS CLOSED. WILL CALL 561-758-6573 CONTACT NUMBER ON DOOR."

**ATTEMPT TO SERVE #2**

**SUBJECT:** ASTRIN, SCOTT, L  
**DATE/TIME:** 03/24/2021 11:29  
**BY:** 4658 - GUADALUPE, LUZ  
**ADDRESS:** 100 TAMPA ST N #2605, TAMPA  
**REMARKS:** CALLED NUMBER AND SPOKE TO MR. SCOTT L ASTRIN AND HE STATED OFFICE HAS BEEN CLOSED FOR ONE YEAR AND WILL NOT GIVE HOME ADDRESS TO BE SERVED OR DAVID WYNNE'S ADDRESS.

**SCOTT L ASTRIN - UNSERVED**

RETURNED NON-SERVABLE

**DATE/TIME:** 03/24/2021 11:29 **BY:** 4658 - GUADALUPE, LUZ  
**ADDRESS:** 100 TAMPA ST N #2605, TAMPA  
**REASON:** NON SERVICE - ATTEMPTS MADE  
**REMARKS:** SPOKE TO SCOTT L ASTRIN AND HE STATED OFFICE HAS BEEN CLOSED FOR 1 YR AND WILL NOT GIVE HOME ADDRESS TO BE SERVED OR DAVID WYNNE'S ADDRESS.



**HILLSBOROUGH COUNTY  
SHERIFF'S OFFICE  
CIVIL PROCESS SECTION**

CIVIL # HS 2021-758

CASE # 2018-CA-010270-4  
Court : CIRCUIT COURT CIVIL

DATE/TIME RECEIVED : 03/22/2021 12:34 COURT DATE : 03/29/2021 DATE RETURNED : 03/25/2021

AGENCY : ORANGE COUNTY

TYPE OF PROCESS : SUBPOENA, NOTICE

WILLIAM WINDSOR  
100 EAST OAK TERRACE DR #UNIT B3  
LEESBURG, FL 34748

HILLSBOROUGH COUNTY, FLORIDA

**PLAINTIFF(S)**

WILLIAM WINDSOR

**DEFENDANT(S)**

BOISE CASCADE BUILDING ETAL  
ROBERT KEITH LONGEST

**SERVE TO(S)**

DAVID WYNNE

**ATTEMPT TO SERVE #1**

SUBJECT: WYNNE, DAVID,

DATE/TIME: 03/24/2021 11:19

BY: 4658 - GUADALUPE, LUZ

ADDRESS: 100 TAMPA ST N #2605, TAMPA

REMARKS: NO RESPONSE AT DOOR AND SIGN STATES "THERE IS CURRENTLY NO STAFF ONSITE. OFFICE IS CLOSED. WILL CALL 561-758-6573 CONTACT NUMBER ON DOOR.

**ATTEMPT TO SERVE #2**

SUBJECT: WYNNE, DAVID,

DATE/TIME: 03/24/2021 11:29

BY: 4658 - GUADALUPE, LUZ

ADDRESS: 100 TAMPA ST N #2605, TAMPA

REMARKS: CALLED NUMBER AND SPOKE TO MR. SCOTT L ASTRIN AND HE STATED OFFICE HAS BEEN CLOSED FOR ONE YEAR AND WILL NOT GIVE HOME ADDRESS TO BE SERVED OR DAVID WYNNE'S ADDRESS.

**DAVID WYNNE - UNSERVED**

RETURNED NON-SERVABLE

DATE/TIME: 03/24/2021 11:29

BY: 4658 - GUADALUPE, LUZ

ADDRESS: 100 TAMPA ST N #2605, TAMPA

REASON: NON SERVICE - ATTEMPTS MADE

REMARKS: CALLED NUMBER AND SPOKE TO MR. SCOTT L ASTRIN AND HE STATED OFFICE HAS BEEN CLOSED FOR ONE YEAR AND WILL NOT GIVE HOME ADDRESS.

# EXHIBIT

## B

IN AND FOR THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND FOR  
ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR

Plaintiff,

vs.

Case No.: 2018-CA-010270-O

ROBERT KEITH LONGEST, an individual,  
And BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C, a  
Foreign Limited Liability Company,

Defendants.

---

**NOTICE OF APPEARANCE AS CO-COUNSEL**

Pursuant to Rule 4-7.21 (g)(3), Florida Rules of Professional Conduct, we hereby disclose that the undersigned and all attorneys and staff of The Law Offices of Scott L. Astrin are all employees of AIG and its affiliated companies. The undersigned is representing Defendants, ROBERT KEITH LONGEST and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., as co-counsel with David I. Wynne, Jr., Esquire, pursuant to a policy of insurance issued by AIG and its affiliated companies.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 19th day of August, 2020, to: William Windsor, billwindsor1@outlook.com  
(Plaintiff Pro Se).

/s/ Scott L. Astrin

SCOTT L. ASTRIN

Florida Bar Number 0084557

Law Offices of Scott L. Astrin

Staff Attorneys for AIG

100 N. Tampa Street, Suite 2605

Tampa, FL 33602

Phone: 813-218-3110

Fax: 813-649-8362

Primary Email: tampapleadings@aig.com

Secondary Email: scott.astrin@aig.com;

emily.christopher@aig.com

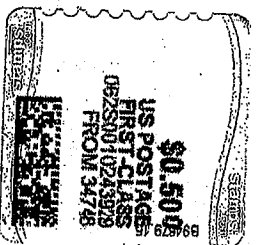
Attorney for Defendants

# EXHIBIT

## C

William M. Windsor  
100 East Oak Terrace Drive #B3  
Leesburg, Florida 34748

11 308  
22 MAY '20  
PM 7 1



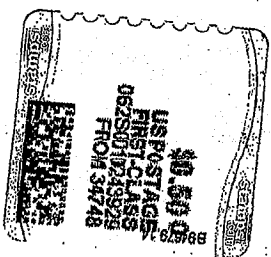
DRUID T. WYMAN  
LAW OFFICES OF SCOTT L. ASTERLIN  
100 N. TRUFA ST SUITE 2605  
TRUFA, FL

NIXIE 339 DE 1 0005/29/20  
RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD

ANK BC: 34748444899 \*0374-07477-22-40  
34748444899

William M. Windsor  
100 East Oak Terrace Drive #B3  
Leesburg, Florida 34748

NIXIE 339 DE 1 0005/29/20  
RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD  
BC: 34748444899 \*0374-07477-22-40  
34748444899



DAVID WYMAN  
LAW OFFICES OF SCOTT L. ASTERLIN  
100 N. TRUFA ST SUITE 2605  
TRUFA, FL 33602

ANK  
33602 33602 33602

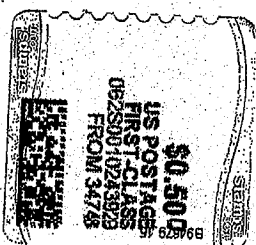
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# **EXHIBIT**

# **D**

William M. Windsor  
100 East Oak Terrace Drive #B3  
Leesburg, Florida 34748

FL 338  
23 MAR 72  
PM 7 1



DAVID I. WYMAN  
LAW OFFICES OF SCOTT L. ASTORIN  
100 N. TAMPA ST SUITE 2605  
TAMPA, FL 33602

NIXIE 339 DE 1 0005/29/20  
RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD

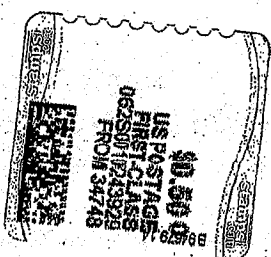
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William M. Windsor  
100 East Oak Terrace Drive #B3  
Leesburg, Florida 34748

NIXIE 339 DE 1 0005/29/20

RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD

BC: 34748444899 \*0374-07477-22-40  
0625001024392



DAVID WYMAN  
LAW OFFICES OF SCOTT L. ASTORIN  
100 N. TAMPA ST SUITE 2605  
TAMPA, FL 33602

ANK  
338 347 48 44 899

0625001024392

# EXHIBIT

# E

## Windsor v Longest Returned Mail

William Windsor <billwindsor1@outlook.com>

Wed 6/3/2020 11:27 AM

To: William Windsor <billwindsor1@outlook.com>

1 attachments (113 KB)

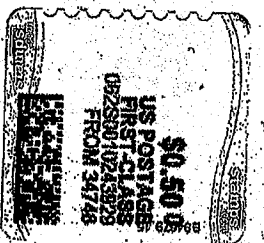
Windsor-v-Longest-Returned-MiaI\_20200603\_112646.pdf

**William M. Windsor**

billwindsor1@outlook.com

William M. Windsor  
100 East Oak Terrace Drive #B3  
Leesburg, Florida 34748

1 39  
2 54 7 20  
PM 3-1

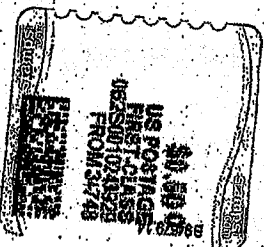


DAVID L. WYMAN  
Law OFFICES OF SCOTT L. ASTRAIN  
100 N. TAUNTA ST Suite 2605  
Tampa, FL

NIXIE 339 DE 1 0005/29/20  
RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD  
ANK BC: 34748444899 \*0374-07443-22-40  
34748444899

William M. Windsor  
100 East Oak Terrace Drive #B3  
Leesburg, Florida 34748

NIXIE 339 DE 1 0005/29/20  
RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD  
BC: 34748444899 \*0374-07477-22-40  
34748444899



DAVID WYMAN  
Law OFFICES OF SCOTT L. ASTRAIN  
100 N. TAUNTA ST Suite 2605  
Tampa, FL 33602

ANK

# EXHIBIT

# F

# MEMBER PROFILE

## Scott L Astrin

Member in Good Standing

Eligible to Practice Law in Florida

**Bar Number:**

84557

**Mail Address:**

Law Offices of Scott L. Astrin

100 N Tampa St Ste 2605

Tampa, FL 33602-5859

Office: 813-218-3110

Cell: 813-218-3110

Fax: 813-229-8049

**Email:**

scott.astrin@aig.com

**Personal Bar URL:**

<https://www.floridabar.org/mybarprofile/84557>

**vCard:**



**County:**

Hillsborough

**Circuit:**

13

**Admitted:**

09/26/1996

**10-Year Discipline History:**

None

---

**Law School:**

Nova Southeastern University - Shepard Broad College of Law

---

**Firm:**

Law Offices of Scott L. Astrin

---

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# **EXHIBIT**

# **G**

# David Irwin Wynne Jr.

Member in Good Standing

Eligible to Practice Law in Florida

**Bar Number:**

326290

**Mail Address:**

AIG  
Law Offices of Scott L. Astrin  
100 N Tampa St Ste 2605  
Tampa, FL 33602-5859  
Office: **813-218-3118**  
Cell: **813-526-0559**

**Email:**

david.wynne@aig.com

**Personal Bar URL:**

<https://www.floridabar.org/mybarprofile/326290>

**vCard:**



**County:**

Hillsborough

**Circuit:**

13

**Admitted:**

09/12/2000

**10-Year Discipline History:**

None



---

**Law School:**

Stetson University College of Law, 2000

---

**Firm:**

AIG

---

**Firm Position:**

Corporate Counsel

---

**Firm Website:**

<http://www.aig.com>

---

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---

Need legal help?

Take a look at our newly enhanced **Lawyer Referral Service site.**

# EXHIBIT

# H

# MEMBER PROFILE

## Regina Franco-Murphey

Member in Good Standing

Eligible to Practice Law in Florida

**Bar Number:**

173789

---

**Mail Address:**

Law Offices of Scott L. Astrin

100 N Tampa St Ste 2605

Tampa, FL 33602-5859

Office: **786-777-7608**

Cell: **786-914-1727** - No Text Messages

Fax: 813-649-8362

---

**Email:**

regina.murphey@aig.com

---

**Personal Bar URL:**

<https://www.floridabar.org/mybarprofile/173789>

---

**vCard:**



**County:**

Hillsborough

---

**Circuit:**

13

---

**Admitted:**

09/15/1999

---

**10-Year Discipline History:**

None

---

**Law School:**

Nova Southeastern University - Shepard Broad College of Law, 1999

---

**Languages:**

Spanish

---

**Federal Courts:**

U.S. District Court, Southern District of Florida

---

**State Courts:**

Florida

---

**Firm:**

Law Offices of Scott L. Astrin

---

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# EXHIBIT

## I

# MEMBER PROFILE

## Richard Heinzman

Member in Good Standing

Eligible to Practice Law in Florida

**Bar Number:**

59968

---

**Mail Address:**

Law Offices of Scott L. Astrin

100 N Tampa St Ste 2605

Tampa, FL 33602-5859

Office: **407-571-6969**

Cell: **407-335-7581** - No Text Messages

Fax: 813-649-8362

---

**Email:**

richard.heinzman@aig.com

---

**Personal Bar URL:**

<https://www.floridabar.org/mybarprofile/59968>

---

**vCard:**



**County:**

Hillsborough

---

**Circuit:**

13

---

**Admitted:**

10/31/2008

---

**10-Year Discipline History:**

None

---

**Practice Areas:**

Civil Litigation

Workers' Compensation/Defense

---

**Federal Courts:**

U.S. District Court, Middle District of Florida

---

**Firm:**

Law Offices of Scott L. Astrin

---

**Firm Position:**

Associate

---

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# EXHIBIT

## J

# MEMBER PROFILE

## Katrina Herrera

Member in Good Standing

Eligible to Practice Law in Florida

**Bar Number:**

575941

---

**Mail Address:**

Law Offices of Scott L. Astrin  
100 N Tampa St Ste 2605  
Tampa, FL 33602-5859  
Office: **407-375-3779**  
Fax: 813-649-8362

---

**Email:**

katrina.herrera@aig.com

---

**Personal Bar URL:**

<https://www.floridabar.org/mybarprofile/575941>

---

**vCard:**



**County:**

Hillsborough

---

**Circuit:**

13

---

**Admitted:**

09/20/2002

---

**10-Year Discipline History:**

None

---

**Law School:**

Florida State University College of Law, 2002

---

**Sections:**

Workers Compensation Law

---

**Firm:**

Law Offices of Scott L. Astrin

---

**Firm Position:**

Corporate Counsel

---

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# EXHIBIT

# K

# MEMBER PROFILE

## Ashley Nicole Rosenbaum

Member in Good Standing

Eligible to Practice Law in Florida

**Bar Number:**

1002820

---

**Mail Address:**

Law Offices of Scott L. Astrin  
100 N Tampa St Ste 2605  
Tampa, FL 33602-5859  
Office: 954-593-9783

---

**Email:**

ashley.rosenbaum@aig.com

---

**Personal Bar URL:**

<https://www.floridabar.org/mybarprofile/1002820>

---

**vCard:**



**County:**

Hillsborough

---

**Circuit:**

13

---

**Admitted:**

09/28/2017

---

**10-Year Discipline History:**

None

---

**Law School:**

**Sections:**

Young Lawyers

---

**Firm:**

Law Offices of Scott L. Astrin

---

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