

NO. _____

**IN THE DISTRICT COURT OF APPEAL
OF THE STATE OF FLORIDA
SIXTH DISTRICT**

CASE NO. 2018-CA-010270-O

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

In re William M. Windsor

William M. Windsor, Petitioner

v.

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

**PETITION FOR WRIT OF PROHIBITION PURSUANT TO FLORIDA
RULES OF APPELLATE PROCEDURE RULE 9.100 IN CASE
2018-CA-010270-O IN THE NINTH JUDICIAL CIRCUIT, WILLIAM
M. WINDSOR V. ROBERT KEITH LONGEST AND BOISE
CASCADE BUILDING MATERIALS DISTRIBUTION**

William M. Windsor, Pro Se

5013 S Louise Ave #1134, Sioux Falls, South Dakota 57108
352-661-8472 -- windsorinsouthdakota@yahoo.com

Blake Mansker -- Scott Warburton, Defendants' Attorneys

Adams | Coogler, P.A., 1555 Palm Beach Lakes Blvd. Suite 1600,
West Palm Beach, FL 33401, 561-478-4500 Fax: 561-478-7847
bmansker@adamscoogler.com, rurban@adamscoogler.com,
swarburton@adamscoogler.com, and ajohnson@adamscoogler.com

TABLE OF CONTENTS

TABLE OF CONTENTS.....2

PARTIES 3

INTRODUCTION..... 4

BASIS FOR INVOKING JURISDICTION..... 5

THE FACTS ON WHICH PETITIONER RELIES..... 6

NATURE OF RELIEF SOUGHT.....12

ARGUMENTS.....13

CONCLUSION AND PRAYER.....41

VERIFICATION.....43

APPENDIX INDEX.....44

CERTIFICATE OF SERVICE.....47

CERTIFICATE OF COMPLIANCE.....48

PARTIES

Judge Jeffrey L. Ashton

Orange County Courthouse
425 N Orange, Courtroom 18-C, Orlando, Florida 32801
407-836-2008 -- 37orange@ninthcircuit.org

William M. Windsor, Pro Se, Plaintiff, Petitioner

5013 S Louise Ave #1134, Sioux Falls, South Dakota 57108
352-661-8472 -- windsorinsouthdakota@yahoo.com

Blake Mansker -- Scott Warburton, Defendants

Adams | Coogler, P.A., 1555 Palm Beach Lakes Blvd. Suite 1600,
West Palm Beach, FL 33401, 561-478-4500 Fax: 561-478-7847
bmansker@adamscoogler.com, rurban@adamscoogler.com,
swarburton@adamscoogler.com, and ajohnson@adamscoogler.com

INTRODUCTION

1. Pursuant to Florida Rules of Appellate Procedure (“FRAP”) Rule 9.100, Rule 9.030(b)(3), the United States Constitution, and the Florida Constitution, Petitioner, William M. Windsor (“Windsor” or “Petitioner” or “Plaintiff”), petitions this Court for a writ of prohibition restraining Judge Jeffrey L. Ashton from enforcing an Order entered 2/21/2023 revoking Windsor’s right to represent himself in Case No. 2018-CA-010270-O. He also seeks a writ of prohibition prohibiting Judge Jeffrey L. Ashton from denying Windsor the right to file anything in Case No. 2018-CA-010270-O unless signed by a member of the Florida Bar.

2. There is no basis at all to revoke Windsor’s Constitutional right to represent himself or require Windsor’s submissions to the Court to be reviewed, approved and signed by a member of the Florida Bar.

3. The Order entered 2/21/2023 says [APPENDIX 85, Page 1 ¶2]: “Pursuant to the authority acknowledged in *Lowery v. Kaplan* 650 So. 2d 114 (4 DCA 1995) and *Rodriguez-Diaz v. Abate* 613 So. 2d 515 (3DCA 1993), Plaintiff’s right of self-representation is hereby revoked. Plaintiff shall be given thirty days to obtain counsel.”

4. The authority acknowledged in *Lowery v. Kaplan* and *Rodriguez-Diaz v. Abate* came after the plaintiffs in those cases were given notice and an opportunity to be heard. This fundamental right of due process was violated by Judge Jeffrey L. Ashton. There was no notice and no opportunity to be heard.

5. I want to apologize right up front to this Court for what I am about to say about Judge Jeffrey L. Ashton. There are no statutes or rules that deprive a pro se citizen of his freedom of speech. I respect him in court. But I hate, loathe, and despise Jeffrey L. Ashton. He is corrupt. He has intentionally inflicted significant emotional distress on me, and his actions have added to my disability and extreme unhappiness with life. From the minute he appeared in the case, he set out to destroy me, find for the dishonest defendants, violate the rules, demean me in public, deny my rights, and interfere with my efforts to obtain medical care. Fortunately, I seem to have left my audio recorder on during hearings, so I have proof of many of the lies. The general public has proof of his lies about his 14 “accidental” involvements on the Ashley Madison sex site with two different accounts and two different credit cards. A liar has no business as a judge.

BASIS FOR INVOKING JURISDICTION

6. Article V, section 4(b)(3) of the Florida Constitution authorizes district courts of appeal to issue writs of prohibition. See also Florida Rules of Appellate Procedure (“FRAP”) 9.030(b)(3); FRAP 9.100. This Court has original jurisdiction.

7. Prohibition is “to prevent courts from acting when there is no jurisdiction to act.” *Sutton v. State*, 975 So. 2d 1073, 1076 (Fla. 2008); *see also* Fla. R. App. P. 9.030(b)(3). Here, seeking a writ of prohibition is the appropriate remedy, because the trial court is continuing to act even though it lacks jurisdiction to do so.

8. Judge Jeffrey L. Ashton has no jurisdiction to violate the Constitutions and the right to due process. He has denied Windsor the right to seek his recusal or disqualification. He has denied Windsor’s Constitutional right to represent himself, and he is expected to dismiss the case with prejudice as of 3/23/2023. He has denied Windsor the right to file an appeal. He has denied Windsor the right to do anything.

9. Judge Jeffrey L. Ashton has no jurisdiction to claim the two orders he cited in his order revoking Windsor’s right to

represent himself because they show on their face that Judge Jeffrey L. Ashton violated the fundamental requirements of this alleged authority.

FACTS ON WHICH THE PETITIONER RELIES

10. This case is about auto negligence. It's about the destruction of Windsor's health and life.

11. On May 5, 2017, Windsor was hit by a Boise Cascade 18-wheeler truck driven by Robert Keith Longest at 70-miles-per-hour. Windsor's car was totaled, and he was disabled. Windsor suffered four herniated discs in his back, five herniated discs in his neck, and an allegedly inoperable abdominal injury, Diastasis Recti. [APPENDICES 104, 105, 106, 107, 108, 109, 110, 111, and 112.] Windsor fell on 12/26/2022 and has lost the use of his left hand. MRIs are pending for his brain, cervical spine, and lumbar spine.

12. Windsor is in constant pain. He can no longer walk unaided. He has fallen many times. He has recently lost the use of his left hand due to the accident six years before. He has extreme difficulty sleeping and never more than a few hours at a time. He has lost 10 teeth and last week was told all the rest have to be

extracted. This has been caused by medication Windsor has to take for anxiety. Windsor's only hope for some relief will come from Case No. 2018-CA-010270-O as his personal insurance coverage ran out long ago and Medicare will not provide coverage while the lawsuit is pending.

13. Windsor's quality of life was ruined by the Defendants. He has no life now other than trying to obtain financial and medical relief in this matter.

14. Jerome Wilt was an eyewitness who called 911. He was the only eyewitness other than Windsor because the trucker, Robert Keith Longest, has sworn he saw nothing. [APPENDIX 87, P 19 Lines 9-25, P 20, Lines 1-6; P 21, Lines 23-254; P 22, Lines 1-2.]

15. On 1/4/2023, Jerome Wilt testified at his deposition that he saw the 18-wheeler (semi) cause the accident, and he was afraid Windsor was seriously injured. He described how the semi crashed into Windsor's lane, lifted all four wheels of his little convertible off the ground, and spun him around 180-degrees. [APPENDIX 86, P 8 Lines 7-14; P 23 Lines 4-25; P 24 Lines 1-15; P 32 Lines 11-25; P. 33 Lines 1-25; P 34 lines 1-25; P 35 Lines 1-25, P 36 Lines 1-24; P

43 Lines 7-25; P 42 Lines 1, 16-25; P 43 Lines 1-8; P 46 Lines 8-25, P 47 Lines 1-4, 20-24.]

16. APPENDIX 96 contains the Third Amended Complaint approved by Judge John Marshall Kest. It has causes of action against each Defendant for Negligence and for Intentional Infliction of Emotional Distress. [APPENDIX 96, EXHIBIT 3, PP 12-14.] Windsor has filed a Motion for Partial Summary Judgment on the issue of liability for Negligence. [APPENDIX 97.]

17. This case was instituted in the Ninth Judicial Circuit in Orange County, Florida on September 20, 2018. [APPENDIX 94, P 1.] The filing fee was paid by WINDSOR. [APPENDIX 94, P 2.]

18. Judge Jeffrey L. Ashton became the judge in January 2021. [APPENDIX 94, P 1.]

19. On 9/8/2021, Windsor filed Chapter 13 bankruptcy. [2018-CA-010270-O DOCKET 09/08/2021.] [APPENDIX 94, 09/08/2021.]

20. On 8/10/2022, the bankruptcy court lifted the stay to allow Windsor to pursue this case as his plan is to pay all debts in full with recovery from this lawsuit. [APPENDIX 88, P 1.]

21. Judge Jeffrey L. Ashton unlawfully entered an order requiring Windsor to have his pleadings checked and certified by an attorney in good standing with the Florida Bar.

22. Windsor tried unsuccessfully for many months to find an attorney to represent him in 2018-CA-010270-O. Then he tried for months to find an attorney who would review and sign his pleadings at low cost, and no one would. He even ran ads on Craigslist.

[APPENDIX 99.]

23. On 12/15/2022, Windsor's bankruptcy attorney very reluctantly agreed to review and sign to approve his filings at no charge.

24. On 1/10/2023, Windsor had his Application for Indigent Status approved by the Orange County Clerk. [APPENDIX 89.]

25. On 1/17/2023, the Defendants' attorney, Jonathan Blake Mansker, called Windsor's Bankruptcy attorney and informed him that he would pursue sanctions and charges against him if he continued to sign Windsor's pleadings. [APPENDIX 95.]

26. On 2/10/2023, the Defendants' attorney, Jonathan Blake Mansker, filed Defendants' Amended Motion to Strike Improperly Named Individuals from Plaintiff's Witness List and

Motion for Sanctions Against Both Plaintiff, William Windsor and Attorney Jeffrey L. Badgley for Continuing to File Frivolous and Repetitive Filings. [APPENDIX 96.] There was nothing frivolous or repetitive. Court-ordered filing of Witness Lists and Exhibits had to be amended as changes were made.

27. On many occasions, Windsor informed Judge Jeffrey L. Ashton that he was in bankruptcy and could not afford an attorney. Judge Jeffrey L. Baxley was well aware of the bankruptcy filing, the stay, and Windsor's approval as Indigent by the Orange County Clerk of Court. [APPENDIX 89.]

28. On 2/21/2023, Judge Jeffrey L. Ashton entered a sua sponte order REVOKING Windsor's right of self-representation ("REVOCATION ORDER"). [APPENDIX 85.]

29. On 2/24/2023, Windsor filed a Complaint Against Judge Jeffrey L. Ashton with the State of Florida Judicial Qualifications Commission. There is no copy in the APPENDIX as the Commission requires confidentiality.

30. On /28/2023, Windsor terminated his bankruptcy attorney, Jeffrey Badgley, because he refused to sign documents after he was threatened by the Defendants' attorney, Blake

Mansker, and Mansker filed charges against him. [APPENDIX 95.] [APPENDIX-100.] Windsor had prepaid Jeffrey Badgley in 2018, and he cannot afford an attorney. He has to represent himself in bankruptcy court. [APPENDIX 90.]

NATURE OF RELIEF SOUGHT

31. The nature of the relief sought in this Petition is a Writ of Prohibition precluding Judge Jeffrey L. Ashton from:

- a. enforcing the Order entered 2/21/2023 revoking Windsor's right of self-representation in Case # 2018-CA-010270-O;
- b. enforcing the Order entered 2/21/2023 that gave Windsor 30 days to hire an attorney;
- c. denying Windsor's right of self-representation in Case # 2018-CA-010270-O;
- d. denying Windsor the right to file a Motion to Recuse and Disqualify Judge Jeffrey L. Ashton;
- e. presiding as a circuit court judge in the matter of William M. Windsor vs. Robert Keith Longest and Boise Cascade Building Materials Distribution, L.L.C. in Case No. 2018-CA-010270-O or in any other matter involving Windsor; and

32. Windsor asks this Court to issue an order to show cause upon receipt of the petition for prohibition that prevents Judge Jeffrey L. Ashton from conducting further action until this Court discharges the writ.

ARGUMENTS

PROHIBITION IS AN APPROPRIATE REMEDY

33. As a threshold issue, this Court must first determine whether prohibition is an appropriate remedy to halt the instant proceedings due to the lack of legal authority for the 2/21/2023 REVOCATION ORDER. [APPENDIX 85.]

34. On 2/21/2023, Judge Jeffrey L. Ashton entered an order without notice or an opportunity to be heard that denies Windsor the right to represent himself and requires that he retain an attorney (“REVOCATION ORDER”.) [APPENDIX 85.]

35. Windsor’s motions and filings have all been valid, well-considered, and well-researched based on Google, Yahoo, FastCase.

“Prohibition is that process by which a superior Court prevents an inferior Court or tribunal from exceeding its jurisdiction or usurping jurisdiction with which it has not been vested by law. *State ex rel. Florida Real Estate Commission v. Anderson, Fla.App.1964*, 164 So.2d 265; *State*

ex rel. O'Donnell v. Hall, Fla.App.1965, 175 So.2d 792. It is an extraordinary writ because it only issues when the party seeking it is without other adequate means of redress for the wrong about to be inflicted by the act of the inferior tribunal.” State ex rel. Ferre v. Kehoe, Fla.App.1965, 179 So.2d 403.

36. Prohibition is an appropriate remedy to prevent courts from acting when there is no jurisdiction to act. [*Sutton v. State, 975 So. 2d 1073, 1076 (Fla. 2008); see also Fla. R. App. 9.030(b)(3).*] There is no legal authority for what Judge Jeffrey L. Ashton did. What’s more, he violated Windsor’s Constitutional rights and has set him up to have his case wrongfully dismissed on 3/23/2023.

ISSUE #1 -- THERE IS NO LEGAL AUTHORITY FOR JUDGE JEFFREY L. ASHTON TO HAVE REVOKED WINDSOR’S RIGHT TO REPRESENT HIMSELF PRO SE.

37. There is no statute or rule to allow a judge to revoke a Plaintiff’s right to represent himself in a civil case.

38. But on 2/21/2023, Judge Jeffrey L. Ashton entered this REVOCATION ORDER without notice of any type:

“ORDER REVOKING PLAINTIFF’S RIGHT TO SELF REPRESENTATION

THIS MATTER comes before the Court, and the Court, having reviewed the file and being otherwise fully informed, finds as follows:

Pursuant to the authority acknowledged in **Lowery v. Kaplan** 650 So. 2d 114 (4 DCA 1995) and **Rodriguez-Diaz v. Abate** 613 So. 2d 515 (3DCA 1993), Plaintiff's Right of self-representation is hereby revoked. Plaintiff shall be given thirty days to obtain counsel."

"...The clerk shall reject all pro-se filings by the Plaintiff
2) The Courts Judicial Assistant shall block all email communications from the Pro-Se Plaintiff. 3) Defendant need not respond to any communication from the Plaintiff. 4) Motion set for today are canceled, Defendant shall reset it's motion, to dismiss no sooner than 45 days from the date of this order. DONE AND ORDERED in Chambers, at Orlando, Orange County, Florida, on 21st day of February, 2023.
Jeffrey L Ashton
Circuit Judge" [APPENDIX 85, Page 1.]

39. Judge Jeffrey L. Ashton cited his authority for this REVOCATION ORDER as *Lowery v. Kaplan* 650 So. 2d 114 (4 DCA 1995) and *Rodriguez-Diaz v. Abate* 613 So, 2d 515 (3DCA 1993). Both of these cases indicate that notice and an opportunity to be heard are requirements. There was no notice or opportunity to be heard. "THIS MATTER" didn't "come before the Court." This is a sua sponte order that should be considered void. Windsor believes Judge Jeffrey L. Ashton may have a mental disorder that causes him to lie repeatedly.

40. *Lowery v. Kaplan* says:

“The petitioner’s response to the **show cause order** argues that his petitions cannot be deemed frivolous because they have all been dismissed for technical deficiencies so there has never been a ruling on the merits. The petitioner does not seem to understand that repeatedly filing petitions for relief which cannot be granted or making successive requests from a court that lacks jurisdiction to grant the relief he seeks, constitutes abusive and frivolous pleading practice just as surely as if his factual allegations were found to be without merit.

“The petitioner promises that he will not file frivolous petitions in the future if the court will just not take away his indigent status. Although he may be sincere, this is an empty promise. If he does not understand that his previous activities were so egregious as to constitute an abuse of this court, he cannot be expected to discriminate in the future between frivolous pleadings and those that may have merit. His “emergency” motion is a perfect example. The show cause order clearly stated that the current petition had been found to be frivolous. Nevertheless, he continues to argue not only that he was entitled to the relief requested but that he was entitled to obtain that relief immediately.

“The prospective denial of indigent status for his future pro se petitions will not affect his ability to seek the issuance of an extraordinary writ in connection with his current criminal prosecutions, since petitions may still be filed by his court-appointed counsel. Nor will he be precluded from filing a pro se appeal of a judgment of conviction or an order denying him post-conviction relief.

“We conclude that the petitioner has failed to show cause why the sanction should not be imposed.”

“We therefore dismiss the petition as a sanction for abusive filings.” We further order the prospective denial of in forma pauperis status for future petitions for extraordinary writs unless they are presented by a member of the Florida

Bar who represents appellant.” (*Lowery v. Kaplan*, 650 So.2d 114 (Fla. App. 1995).) [**emphasis added.**]

“The **petitioner’s response to the show cause order** argues that his petitions cannot be deemed frivolous because they have all been dismissed for technical deficiencies so there has never been a ruling on the merits. The petitioner does not seem to understand that repeatedly filing petitions for relief which cannot be granted or making successive requests from a court that lacks jurisdiction to grant the relief he seeks, constitutes abusive and frivolous pleading practice just as surely as if his factual allegations were found to be without merit.

“The petitioner promises that he will not file frivolous petitions in the future if the court will just not take away his indigent status. Although he may be sincere, this is an empty promise. If he does not understand that his previous activities were so egregious as to constitute an abuse of this court, he cannot be expected to discriminate in the future between frivolous pleadings and those that may have merit. His “emergency” motion is a perfect example. The show cause order clearly stated that the current petition had been found to be frivolous. Nevertheless, he continues to argue not only that he was entitled to the relief requested but that he was entitled to obtain that relief immediately.

41. *Rodriguez-Diaz v. Abate* says:

“Review is sought of an order which prohibits the appellant from representing himself as plaintiff in these actions for malicious prosecution, intentional infliction of emotional distress and harassment. **The trial court’s order on rule to show cause** is restated verbatim:

“THIS CAUSE having come on to be heard March 9, 1992 pursuant to the Rule to Show Cause issued February 12, 1992 and upon Plaintiff’s request for a hearing pursuant to F.S. 90.204 and the Court having

taken testimony, reviewed the file and otherwise being fully advised in the premises, it is

“ORDERED AND ADJUDGED as follows:

“Mr. Diaz’s written and oral responses to the Rule to Show Cause evinces the necessity for the issuance of this Order.”

ORDERED AND ADJUDGED as follows:

(1) The **return to the Rule being insufficient to show cause** why the prohibiting features thereof should not be carried out, Omar Rodriguez-Diaz is hereby prohibited from henceforth representing himself as Plaintiff or Petitioner before the undersigned Judge in any pending or future matters assigned to its division.” (*Rodriguez-Diaz v. Abate*, 613 So.2d 515 (Fla. App. 1993) [**emphasis added.**]

42. In the instant matter, there was neither notice nor an opportunity to be heard. There was no order to show cause.

43. Windsor believes Judge Jeffrey L. Ashton issued the REVOCATION ORDER because he saw that Windsor had accumulated a massive pile of evidence against the Defendants and their attorneys. He knew Windsor could not afford an attorney, so this set him up for dismissal.

44. The REVOCATION ORDER has no legal authority.

45. The arbitrary and irrational exercise of power by Judge Jeffrey L. Ashton violated Windsor’s substantive due process rights.

(*WCI Cmtys., Inc. v. City of Coral Springs*, 885 So.2d 912, 914 (Fla. 4th DCA 2004).)

46. The rights of parties cannot be taken without notice and opportunity for hearing. The action by Judge Jeffrey L. Ashton was unreasonable and unjust. Windsor did nothing wrong. Judge Jeffrey L. Ashton's purported complaint was that Windsor was filing evidence after being denied an evidentiary hearing after the Defendants filed and submitted to the Court 275 pages of documents. [APPENDIX 94 - DOCKET, 02/10/2013.] If you can't submit evidence at a hearing, then a sworn affidavit authenticating the exhibits is the only other option.

**ISSUE #2 – THE UNITED STATES CONSTITUTION, THE
FLORIDA CONSTITUTION, AND A MASSIVE AMOUNT OF CASE
LAW PROVIDE WINDSOR HAS THE
RIGHT TO REPRESENT HIMSELF IN COURT.**

47. Several courts have written: “The right to represent oneself in a civil proceeding is on a scale of importance equal to the right of trial by jury.”

48. American courts have secured the right to represent oneself in court since the beginning of the nation. The Judiciary Act

of 1789 and U.S.C. The Judiciary Act of 1789 recognized the right to personally present oneself in court without a lawyer. In 1948, this right was reaffirmed under U.S.C. § 1654 which reads: “In all courts of the United States the parties may plead and conduct their own cases personally or by counsel as, by the rules of such courts, respectively, are permitted to manage and conduct causes therein.”

49. U.S. Supreme Court Cases reaffirming the right to self-representation include: *Osborn v. Bank of the United States* (1824); *Haines v. Kerner* (1972); *Faretta v. California* (1975).

50. The Rules of Judicial Conduct Recognize this Right further. The Rules of Judicial Conduct published by the American Bar Association reaffirm this right as well. Rule 2.6 Enduring the Right to Be Heard, reminds judges to uphold the right to be heard. Either by oneself or with a lawyer. “(A) A judge shall accord to every person who has a legal interest in a proceeding, or that person’s lawyer, the right to be heard according to law.” ABA Model Code of Judicial Conduct Rule 2.6 “A judge shall accord [all]... the right to be heard...”

51. *Elmore v. McCammon* (1986) 640 F. Supp. 905 “... the right to file a lawsuit pro se is one of the most important rights under the constitution and laws.”

52. In *Picking v. Pennsylvania Railway*, 151 F.2d. 240, Third Circuit Court of Appeals: The plaintiff’s civil rights pleading was 150 pages and described by a federal judge as “inept”. Nevertheless, it was held “Where a plaintiff pleads pro se in a suit for protection of civil rights, the Court should endeavor to construe Plaintiff’s Pleadings without regard to technicalities.”

53. See also *Jenkins v. McKeithen*, 395 U.S. 411, 421 (1959); *Pucket v. Cox*, 456 2nd 233; *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938; *Sherar v. Cullen*, 481 F. 2d 946 (1973) “There can be no sanction or penalty imposed upon one because of his exercise of Constitutional Rights.”

54. In *Boyd v. United*, 116 U.S. 616 at 635 (1885) Justice Bradley wrote: “It is the duty of the Courts to be watchful for the Constitutional Rights of the Citizens, and against any stealthy encroachments thereon. Their motto should be *Obsta Principiis*.”

55. In *Downs v. Bidwell*, 182 U.S. 244 (1901): “It will be an evil day for American Liberty if the theory of a government outside

supreme law finds lodgement in our constitutional jurisprudence. No higher duty rests upon this Court than to exert its full authority to prevent all violations of the principles of the Constitution.”

56. *Gomillion v. Lightfoot*, 364 U.S. 155 (1966), cited also in *Smith v. Allwright*, 321 U.S. 649.644 “Constitutional ‘rights’ would be of little value if they could be indirectly denied.”

57. *Miranda v. Arizona*, 384 U.S. 426, 491; 86 S. Ct. 1603 “Where rights secured by the Constitution are involved, there can be no ‘rule making’ or legislation which would abrogate them.”

58. *Norton v. Shelby County*, 118 U.S. 425 p. 442 “An unconstitutional act is not law; it confers no rights; it imposes no duties; affords no protection; it creates no office; it is in legal contemplation, as inoperative as though it had never been passed.”

59. *Sherar v. Cullen*, 481 F. 2d 946 (1973): “There can be no sanction or penalty imposed upon one because of his exercise of constitutional rights.” *Simmons v. United States*, 390 U.S. 377 (1968) “The claim and exercise of a Constitution right cannot be converted into a crime”... “a denial of them would be a denial of due process of law”. *Warnock v. Pecos County, Texas*, 88 F3d 341 (5th Cir. 1996) Eleventh Amendment does not protect state officials from

claims for prospective relief when it is alleged that state officials acted in violation of federal law.

60. See also *Butz v. Economou*, 98 S. Ct. 2894 (1978); *United States v. Lee*, 106 U.S. at 220, 1 S. Ct. at 261 (1882): “No man [or woman] in this country is so high that he is above the law. No officer of the law may set that law at defiance with impunity. All the officers of the government from the highest to the lowest, are creatures of the law, and are bound to obey it.” *Cannon v. Commission on Judicial Qualifications*, (1975) 14 Cal. 3d 678, 694 Acts in excess of judicial authority constitutes misconduct, particularly where a judge deliberately disregards the requirements of fairness and due process. *Geiler v. Commission on Judicial Qualifications*, (1973) 10 Cal.3d 270, 286 Society’s commitment to institutional justice requires that judges be solicitous of the rights of persons who come before the court. *Gonzalez v. Commission on Judicial Performance*, (1983) 33 Cal. 3d 359, 371, 374 Acts in excess of judicial authority constitutes misconduct, particularly where a judge deliberately disregards the requirements of fairness and due process. *Olmstad v. United States*, (1928) 277 U.S. 438 “Crime is contagious. If the Government becomes a lawbreaker, it

breeds contempt for law; it invites every man to become a law unto himself; it invites anarchy.”

61. *U.S. v. Lee*, 106 U.S. 196, 220 1 S. Ct. 240, 261, 27 L. Ed 171 (1882) “No man in this country is so high that he is above the law. No officer of the law may set that law at defiance, with impunity. All the officers of the government, from the highest to the lowest, are creatures of the law are bound to obey it.” “It is the only supreme power in our system of government, and every man who, by accepting office participates in its functions, is only the more strongly bound to submit to that supremacy, and to observe the limitations which it imposes on the exercise of the authority which it gives.”

62. *Duncan v. Missouri*, 152 U.S. 377, 382 (1894) says: “Due process of law and the equal protection of the laws are secured if the laws operate on all alike, and do not subject the individual to an arbitrary exercise of the powers of government.”

63. *Giozza v. Tiernan*, 148 U.S. 657, 662 (1893), Citations Omitted: “Undoubtedly it (the Fourteenth Amendment) forbids any arbitrary deprivation of life, liberty or property, and secures equal protection to all under like circumstances in the enjoyment of their

rights... It is enough that there is no discrimination in favor of one as against another of the same class. ...And due process of law within the meaning of the [Fifth and Fourteenth] amendment is secured if the laws operate on all alike, and do not subject the individual to an arbitrary exercise of the powers of government.”

64. *Kentucky Railroad Tax Cases*, 115 U.S. 321, 337 (1885): “The rule of equality... requires the same means and methods to be applied impartially to all the constituents of each class, so that the law shall operate equally and uniformly upon all persons in similar circumstances”.

65. *Truax v. Corrigan*, 257 U.S. 312, 332: “Our whole system of law is predicated on the general fundamental principle of equality of application of the law. ‘All men are equal before the law.’ ‘This is a government of laws and not of men,’ ‘No man is above the law,’ are all maxims showing the spirit in which legislatures, executives, and courts are expected to make, execute and apply laws. But the framers and adopters of the (Fourteenth) Amendment were not content to depend... upon the spirit of equality which might not be insisted on by local public opinion. They therefore embodied that spirit in a specific guaranty.”

66. *The Florida Supreme Court* says this: “A person should not be forced to have an attorney represent his legal interests if he does not consent to such representation. All citizens in our state are also guaranteed access to our courts by Article I, Section 21, Florida Constitution (1968).” [*Florida Bar v. Brumbaugh*, 355 So.2d 1186 (Fla. 1978).]

**ISSUE #3 – THE REVOCATION ORDER VIOLATES SECTION 9
OF THE FLORIDA CONSTITUTION.**

67. Florida Constitution “9. **Due process** No person shall be deprived of life, liberty or property without **due process** of law.”

68. There was no notice. There was no opportunity to be heard. There was no due process, just a terminally biased judge.

69. The Constitutions of the United States and Florida guarantee due process of law. U.S. Const. amend. XIV, § 1; Fla. Const. art. I, § 9. “The denial of due process rights, including the opportunity to be heard, to testify, and to present evidence, is fundamental error.” *Weiser v. Weiser*, 132 So. 3d 309, 311 (Fla. 4th DCA 2014). [*Wanda I. Rufin, P.A. v. Borga*, 294 So.3d 916 (Fla. App. 2020).]

**ISSUE #4 – JUDGE JEFFREY L. ASHTON OBLITERATED
THE RIGHTS TO DUE PROCESS BY ISSUING THE REVOCATION
ORDER AGAINST WINDSOR.**

70. Judge Jeffrey L. Ashton denied due process to Windsor, and he did it to make it impossible for Windsor to properly respond to his totally biased REVOCATION ORDER and everything else in the case.

71. In his REVOCATION ORDER, Judge Jeffrey L. Ashton said:

“The History of this case is replete with examples of the Plaintiff’s abuses. The efforts by the Court to curtail these abuses by requiring review by counsel have utterly failed. In a recent hearing, the Court has learned that plaintiff threatened a witness during cross examination resulting in the Court requiring the continuation of the deposition to be taken by a licensed attorney or before a Special Master. In response, Plaintiff threatened to un-necessarily prolong the questioning of the witness at trial. In response to the hearing set for this date Plaintiff has returned to his abusive filings. He has, in the last four days filed 1,504 documents. Plaintiff has previously been sanction for his abusive conduct in litigation. The right to self-presentation does not the right to threaten, harass and abuse.”

72. Windsor believes Judge Jeffrey L. Ashton may be a mentally ill man because he lies and then lies some more. The truth is the history of this case is replete with examples of the

Defendants' abuses. The Answer, Interrogatories, and Requests for Admissions contain one falsehood after another. Defendants' Motions are usually false and never signed or sworn.

73. Judge Jeffrey L. Ashton has utterly failed... but as a purported judge and human being. Since Windsor was unlawfully forced to get an attorney to sign his pleadings on 1/10/2023, the Defendants have filed 1461 documents (none signed or verified) while Windsor has filed 511 (all certified for filing by a member in good standing of the Florida Bar). The truth is Windsor filed seven (7) motions totaling 511-pages, virtually all EVIDENCE. The evidence was necessitated by the Defendants' Motion to Strike Witnesses and Sanctions on 2/7/2023. [APPENDIX 91.] All of the evidence can be seen on the Docket from 2/16/2023 to 2/21/2023. [APPENDIX 94.]

74. APPENDIX 92 is printed from the DOCKET and shows the filings and indicates who filed. Both Windsor and the Defendants filed seven (7) motions. The Defendants are responsible for 137 Docket Entries while Windsor hit the Docket 38 times.

75. If these filings deny an American the right to represent himself in court, that sound you hear is our forefathers turning over in their graves.

76. What Judge Jeffrey L. Ashton should have written is what Windsor believes he was thinking “OH _____. That damn Windsor has evidence, case law, and a motion that will blow the Defendants out of the water. I’ve got to stop him.”

77. Judge Jeffrey L. Ashton and the Defendants have been horribly abusive in this case. Windsor believes they are conspiring.

78. Windsor believes Judge Jeffrey L. Ashton will say and do anything. The Plaintiff never threatened a witness during cross examination resulting in the Court requiring the continuation of the deposition to be taken by a licensed attorney or before a Special Master. APPENDIX 93, P 31, Line 25; P 32 Lines 1-25, P 33 Lines 1-254, P 34 Lines 1-16, P 36 Lines 3-6 show that Windsor was polite and attempting to protect the dishonest witness by encouraging him to have legal counsel because Windsor was preparing to sue him and has already reported him to his superiors with the Florida Highway Patrol. This was explained to Judge Jeffrey L. Ashton in open court, and he said “I don’t believe for a

second anything you said.” Windsor cannot afford the TRANSCRIPT of the 2/10/2023 Hearing, but Windsor does have a tape recording of the hearing that he will provide to this Court upon request.]

79. Judge Jeffrey L. Ashton, not known for his honesty a la Ashley Madison, outrageously claimed Windsor threatened to unnecessarily prolong the questioning of the witness at trial. Windsor said if Judge Jeffrey L. Ashton denied Windsor a deposition, he would just have to ask the questions at the trial. That was no threat. Judge Jeffrey L. Ashton will prolong the trial if Windsor continues to be denied all forms of discovery, or he will simply disallow everything Windsor needs to do.

80. Then Judge Jeffrey L. Ashton wrote on 2/21/2023 at 12:09:51 p.m.: “In response to the hearing set for this date Plaintiff has returned to his abusive filings. He has, in the last four days filed 1,504 documents. Plaintiff has previously been sanction for his abusive conduct in litigation. The right to self-presentation does not the right to threaten, harass and abuse.” Judge Jeffrey L. Ashton made all of this up. Windsor has not threatened, harassed, or abused in legal proceedings. He is writing a book about this case, and it will be brutally honest. He will spread the word far and

wide on social media. He plans protests at the Orange County Courthouse, and he will utilize every legal means possible to expose Jeffrey L. Ashton, Lisa T. Munyon, and others.

81. In the last FOUR days, Windsor had filed four docket entries totaling 429 pages. If 2/17/2023 is added to the equation, it was 1,062 pages [APPENDIX 92.] There was one motion and one affidavit. All the rest was evidence to prove the malicious and false claims of the Defendants. Windsor produced every document with his right hand and index finger from emails in his email program.

82. Judge Jeffrey L. Ashton must be prohibited from doing what he is doing. Windsor has no means of redress but this.

83. Windsor has been denied the right to file a motion for recusal and disqualification of Judge Jeffrey L. Ashton because his bankruptcy attorney was unwilling to put his livelihood at risk.

84. Judge Jeffrey L. Ashton's authority comes from the Constitutions, and he has violated Article I Section 2, Section 9, and Section 21.

ISSUE #5 - THE REVOCATION ORDER
HAS NO LEGAL BASIS WHATSOEVER.

85. Windsor attempts to read EVERY case that may be applicable to any issue he is facing. Windsor has reviewed all cases that could be relevant to the instant case. In the history of the State of Florida, there appear to have been 172 people denied the right to file anything unless signed by a member of the Florida Bar. APPENDIX 101 includes a spreadsheet listing all 172. [APPENDIX 101, EXHIBIT 2464.] 148 of those required to have pleadings signed by a member of the Florida Bar were prisoners. 5 of the 177 were attorneys limited by The Florida Bar while disbarred. So, 19 were not prisoners or disbarred attorneys.

86. Nineteen (19) Florida citizens in the entire history of the state! Windsor has summarized the opinions in each of the 19 cases. [APPENDIX 101, EXHIBIT 2463.]

87. Judge Jeffrey L. Ashton made Windsor the 20th. Windsor believes if this were a criminal case, he would be headed for Death Row.

88. The cases reviewed show there is no way in the world for any court to require Windsor to have his pleadings signed by a member of the Florida Bar.

89. APPENDIX 101, EXHIBIT 2464 is the spreadsheet listing all 172. The first column numbers them. The second column shows the Case Style. The third column shows if the Plaintiff was a Prisoner. The fourth column provides a brief summary of the Issues. The fifth column indicates whether the Plaintiff had been ruled to be a Vexatious Litigant under Florida law. The sixth column indicates whether the case was further addressed in a Memorandum of Law. [APPENDIX 25.] The seventh column indicates whether the opinion indicated a Show Cause Order had been issued by the appellate court. The eighth and ninth columns provide the remainder of the citation (in addition to the first column).

90. Three of the 19 had been declared Vexatious Litigants pursuant to Florida statutes. Windsor cannot be so declared. He's never lost a Florida case.

91. The 19 penalized people included a frivolous and flagrant attempt to circumvent the Court's previously entered sanction order. One plaintiff filed identical petitions in multiple cases in violation of a court order. Windsor has not violated any court order, and he has never filed an identical petition.

92. The other penalized Plaintiffs had 17 cases filed with no relief and determined frivolous; 85 cases filed; multiple meritless petitions; 22 cases showing a profound lack of understanding of the court system in general and of the appellate system in particular; 45 cases dismissed; 26 baseless Florida pleadings; numerous pleadings devoid of merit and failure to properly pursue actions; numerous meritless filings; 25 appellate proceedings found to have no merit; relitigating matters decided earlier and 12 federal court actions against judges. Windsor has never filed anything frivolous or baseless. Windsor has an excellent understanding of the court system; he has never filed an appellate proceeding found to have no merit. Windsor has taken multiple matters to the United States Supreme Court, and nothing was found to be improper. Windsor used to have a genius IQ, but this ordeal has damaged his memory.

93. Not a single one of the 172 was restricted in Florida because of something that purportedly happened in another state.

ISSUE #6 -- JUDGE JEFFREY L. ASHTON FAILED TO PROVIDE DUE PROCESS AND EQUAL PROTECTION TO WINDSOR.

94. 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)

95. Windsor has just cause to believe that he cannot be given a fair trial. This is an understatement. He hasn’t been given a fair trial, and he won’t be given a fair trial as long as the infamous Casey Anthony and Ashley Madison judge is involved.

96. Judge Jeffrey L. Ashton refused to show even a smidgen of common decency when Windsor was hospitalized and unable to participate in a hearing. He has continued to allow every filing by the Defendants to be made unsigned much less verified or supported by affidavit. He has endorsed the many motions of the Defendants seeking to find Windsor in contempt without question, and he accepted as proper their unprecedented motion to have Windsor declared mentally incompetent to represent himself as a plaintiff. Windsor’s email addresses seem to have been blocked for as long as three weeks by the E-Portal. Judge Jeffrey L. Ashton has

coached the attorneys for the Defendants, and he has made false statements in his orders. Page Limits do not allow a recitation of all the wrongdoing by Judge Jeffrey L. Ashton's wrongdoing, so see five docket entries on 2018-CA-0102170-O, 02/02/2021; and see APPENDIX 102 – Plaintiff's Motion to Disqualify Judge Jeffrey L. Ashton Due to Denial of Due Process file stamped 04/01/2021. Please see APPENDIX 94 and the Docket entries on 2018-CA-0102170-O, 04/01/2021. Note that the file-stamped Motion to Disqualify has disappeared from the Docket. A check of the dates thereafter indicate that Judge Jeffrey T. Ashton never responded to the Motion to Disqualify. Docket entries on 2018-CA-0102170-O, 04/01/2021 to Present. OMG, see APPENDIX 113, 04/01/2021 – Motion to Disqualify or Recuse Due to Denial of Due Process. Windsor periodically prints the Docket because he has experienced disappearing filings quite often. APPENDIX 103 is the Affidavit of Prejudice I want to file now but am denied the right.

97. The due process clauses of both the Constitutions of Florida and the United States 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.

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

99. Judge Jeffrey L. Ashton is Hell-bent on ignoring Windsor's rights while working for the Defendants' attorneys.

ISSUE #7 -- JUDGE JEFFREY L. ASHTON VIOLATED THE CONSTITUTIONAL RIGHTS OF WINDSOR.

100. Judge Jeffrey L. Ashton has violated Windsor's Constitutional rights.

101. 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. Theoretically, *Pro Se* Litigants have no less of a right to effective due process as those who utilize an attorney. This is what Windsor's children used to call a Fig Newton of imagination.

102. The Due Process Clause entitles a person to an impartial and disinterested tribunal in both civil and criminal cases. This requirement of neutrality in adjudicative proceedings safeguards the two central concerns of procedural due process, the prevention of unjustified or mistaken deprivations and the promotion of participation and dialogue by affected individuals in the decision-making process. See *Carey v. Piphus*, 435 U.S. 247, 259-262, 266-267 (1978). The neutrality requirement helps to guarantee that life, liberty, or property will not be taken on the basis of an erroneous or distorted conception of the facts or the law. See *Matthews v. Eldridge*, 424 U.S. 319, 344 (1976). At the same time, it preserves both the appearance and reality of fairness, 'generating the feeling, so important to a popular government, that justice has been done,' *Joint Anti-Fascist Committee v. McGrath*, 341 U.S. 123, 172, (1951) (Frankfurter, J., concurring), by ensuring that no person will be deprived of his interests in the absence of a proceeding in which he may present his case with assurance that the arbiter is not

predisposed to find against him. *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242 (1980).

103. Canon 3E, Fla. Code Jud. Conduct, and Rule 2.160, Fla. R. Jud. Admin., mandate that a judge disqualify himself in a proceeding “in which the judge’s impartiality might reasonably be questioned.” The disqualification rules require judges to avoid even the appearance of impropriety: It is the established law of this State that every litigant is entitled to nothing less than the cold neutrality of an impartial judge. It is the duty of the court to scrupulously guard this right of the litigant and to refrain from attempting to exercise jurisdiction in any manner where his qualification to do so is seriously brought into 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. *Crosby v. State*, 97 So.2d 181 (Fla. 1957); *State ex rel. Davis v. Parks*, 141 Fla. 516, 194 So. 613 (1939); *Dickenson v. Parks*, 104 Fla. 577, 140 So. 459 (1932); *State ex rel. Mickle v. Rowe*, 100 Fla. 1382, 131 So. 3331 (1930).

104. For due process and to secure Constitutional rights 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 they do not provide, while abusing and disadvantaging Windsor.

105. Judge Jeffrey L. Ashton has lied and demeaned Windsor in open court hearings. It's as if he never read the Code of Judicial Conduct or the Bible.

106. 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 Jeffrey L. Ashton has violated Windsor's rights by using his power to inflict his bias.

107. For due process, Windsor has the right to protections expressly created in statute and case law. Due process allegedly ensures the government will respect all of a person's legal rights and guarantee fundamental fairness. Judge Ashton violated Windsor's rights by using his power to ignore facts and the law.

108. 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 Jeffrey L. Ashton has interfered with the process and violated rules for the purpose of damaging Windsor.

109. An inherent Constitutional right is the honesty of the judge. Judge Jeffrey L. Ashton has not been honest. He has violated Canons 1, 2, and 3 of the Code of Judicial Conduct.

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

111. Judge Jeffrey L. Ashton has denied Windsor's rights of equal protection under the law and his mission seems to be to bury him any way he can.

CONCLUSION AND PRAYER FOR RELIEF

WHEREFORE, Petitioner, WILLIAM M. WINDSOR, respectfully urges the Court to enter a writ prohibiting Judge Jeffrey L. Ashton from the following and anything else this Court feels is appropriate:

- a. enforcing the Order entered 2/21/2023 revoking Windsor's right of self-representation in Case # 2018-CA-010270-O;
- b. enforcing the Order entered 2/21/2023 that gave Windsor 30 days to hire an attorney;

- c. denying Windsor's right of self-representation in Case # 2018-CA-010270-O;
- d. denying Windsor the right to file a Motion to Recuse and Disqualify Judge Jeffrey L. Ashton; and
- e. presiding as a circuit court judge in the matter of William M. Windsor vs. Robert Keith Longest and Boise Cascade Building Materials Distribution, L.L.C. in Case No. 2018-CA-01270-O or in any other matter involving Windsor.

112. Windsor also asks this Court to issue an order to show cause upon receipt of this Petition for Writ of Prohibition that prevents Judge Jeffrey L. Ashton from conducting further action until this Court discharges the writ.

Dated in Lake Panasoffkee, Florida this 2nd day of March, 2023,

/s/ William M. Windsor

William M. Windsor
5013 S Louise Ave #1134
Sioux Falls, South Dakota 57108
352-661-8472
windsorinsouthdakota@yahoo.com

VERIFICATION

My name is William M. Windsor. My date of birth is October 2, 1948. My address is 5013 S Louise Ave #1134, Sioux Falls, South Dakota 57108, Lincoln County, USA.

Pursuant to Florida Statute 92.525, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 2nd day of March, 2023 in Lake Panasoffkee, Florida,

/s/ William M. Windsor

William M. Windsor

5013 S Louise Ave #1134

Sioux Falls, South Dakota 57108

352-661-8472

windsorinsouthdakota@yahoo.com

APPENDIX INDEX

- APPENDIX 1 -- Complaint to initiate Case No. 2018-CA-01270-O in the Ninth Judicial Circuit in Orange County, Florida filed by Dan Newlin on 9/20/2018.
- APPENDIX 25 – Windsor Memorandum of Law Regarding Pleadings Signed by a Member of the Florida Bar filed 2/25/2021.
- APPENDIX 82 – 2018-CA-010270-O-Hearing-Transcript-2021-04-05
- APPENDIX 85 – 018-CA-010270-O-ORDER-Revoking-Right-of-Self-Representation-2023-02-21
- APPENDIX 86 – Deposition-of-Jerome-Wilt-Transcript-2023-01-05
- APPENDIX 87 – Deposition-Robert-Longest-Transcript-2019-02-05
- APPENDIX 88 – Order Granting Motion For Relief From Stay RE Personal Injury Action in Orange Circuit Court 2018-CA-010270 - 08.10.22
- APPENDIX 89 – 2018-CA-010270-O-Application-for-Indigent-Status-FINDING-OF-INDIGENT-2023-01-10-FILE-STAMPED
- APPENDIX 90 – Termination of Jeff Badgley and his law firm-2023-02-28
- APPENDIX 91 – 2018-CA-010270-O-DEFENDANTS-Motion-to-Strike-Witnesses-and-Sanctions-2023-02-07-FILE-STAMPED
- APPENDIX 92 – 2018-CA-010270-O Docket Analysis

APPENDIX 93 – Deposition-of-Trooper-Gregory-Linzmaye-
Transcript-2023-01-05

APPENDIX 94 – Docket 2018-CA-010270-O

APPENDIX 95 – Jonatan Blake Mansker makes accusations against
Jeff Badgley

APPENDIX 96 – Third Amended Complaint

APPENDIX 97 – 2018-CA-010270-O-PLAINTIFF-Motion-for-
Summary-Judgment-Partial-2023-01-31-10-45-06-
AM-FILE-STAMPED

APPENDIX 98 – 2018-CA-010270-O-Docket-Pages-1-3

APPENDIX 99 – Email-to-Badgley-Craigslist-Ad-2022-11-29

APPENDIX 100 – Email-fom-Mansker-filing-against-Badgley-2023-
02-07

APPENDIX 101 – 2018-CA-010270-O-Memorandum-of-Law-
regarding-Pleadings-Signed-by-Member-of-Florida-
Bar-VERIFIED-2021-02-26

APPENDIX 102 – 2018-CA-010270-O-Motion-to-Disqualify-Judge-
Jeffrey-L-Ashton-2021-04-01-FILED-COPY

APPENDIX 103 – Affidavit-of-Prejudice-of-Judge-Jeffery-L-Ashton-
2023-02-24-EXECUTED

APPENDIX 104 – CT-Scan-2017-06-20

APPENDIX 105 – CT-Scan-2017-07-24

APPENDIX 106 – CT-Scan-2017-12-14-neck

APPENDIX 107 – CT-Scan-2018-02-23

APPENDIX 108 – CT-Scan-2018-05-10

APPENDIX 109 – MRI-2018-06-07

APPENDIX 110 – MRI-Neck-and-Back-2019-03-20

APPENDIX 111 – MRI-Cervical-Spine-2020-04-23

APPENDIX 112 – MRI-Lumbar-Spine-2020-04-23

APPENDIX 113 – Docket showing Motion to Recuse was docketed
on 4/1/2021

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing by Electronic Mail or United States Postal Service:

Blake Mansker
Scott Warburton

Adams | Coogler, P.A., 1555 Palm Beach Lakes Blvd. Suite 1600
West Palm Beach, FL 33401-2329
561-478-4500 -- Fax: 561-478-7847

bmansker@adamscoogler.com, rurban@adamscoogler.com,
swarburton@adamscoogler.com, and ajohnson@adamscoogler.com

Judge Jeffrey L. Ashton

Orange County Courthouse, 425 N Orange, Courtroom 18-C
Orlando, FL 32801, 407-836-2008, 37orange@ninthcircuit.org

This 2nd day of March, 2023,

/s/ William M. Windsor

William M. Windsor

5013 S Louise Ave #1134
Sioux Falls, South Dakota 57108
352-661-8472
windsorinsouthdakota@yahoo.com

CERTIFICATE OF COMPLIANCE

I HEREBY CERTIFY that this Petition complies with the font requirements of Rule 9.045 of the Florida Rules of Appellate Procedure. This Petition contains 7,829 words and is 40 pages.

This 2nd day of March, 2023,

/s/ William M. Windsor

William M. Windsor

5013 S Louise Ave #1134

Sioux Falls, South Dakota 57108

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