

Robin E. Pinelle, Circuit Clerk
NH Circuit Court
10th Circuit – District Division – Derry
10 Courthouse Lane
Derry, NH 03038

June 25th, 2018

Paul Maravelias
34 Mockingbird Hill Rd
Windham, NH 03087

RE: Christina DePamphilis v. Paul Maravelias
Docket No. 473-2016-CV-00124

Dear Clerk Pinelle,

Enclosed please find Respondent's *Motion for Reconsideration* for filing in the above-referenced case.

Thank you for your attention to this matter.

Sincerely,

Paul J. Maravelias



CC: Simon R. Brown, Esq., Heather Iworsky

I, Paul Maravelias, certify that a copy of the present *Motion for Reconsideration* was forwarded on this day through USPS Certified Mail to Simon R. Brown, Esq., counsel for the Plaintiff, Christina DePamphilis, P.O. Box 1318, Concord, NH, 03302-1318.



THE STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS

10th CIRCUIT – DISTRICT DIVISION – DERRY

Docket No. 473-2016-CV-124

Christina DePamphilis

v.

Paul Maravelias

MOTION FOR RECONSIDERATION

Paul Maravelias, the Respondent, in dutiful compliance with the customs necessitated by proper court etiquette, restrains his justified indignation and submits respectfully this Motion for Reconsideration of the Court’s unlawful 6/15/18 Order extending the Stalking Order in the above-referenced case.

1. Christina DePamphilis (hereinafter, the “Petitioner”) is a high school senior turning 18 this year. She has pictured herself consuming and/or under the influence of alcoholic and other controlled substances in social media artifacts submitted to this Court while complaining that Maravelias’s non-threatening, lawful expressions made in private to other parties endanger her “personal safety”. She filed a Stalking Petition against Mr. Maravelias in late 2016 after he respectfully invited her to dinner and never spoke to her ever again after the day of her rejection. She complained of his older age in the Petition and then pictured herself united to a 21-year-old boyfriend weeks later as a 16-year-old. At the 5/3/18 Hearing, she said she feels she is being “stalked” by Mr. Maravelias “every single day” because he continues to “mention [her and her legal action against him] to other people”.
2. Paul Maravelias (hereinafter, the “Respondent”) is a 23-year-old author and recent Ivy League graduate who is presently employed as a software engineer. The first time he asked a young woman

out to dinner, she filed a vindictive Stalking Petition weeks later against him because her father David DePamphilis had an argument with him and was extremely angry. The Petitioner later had Mr. Maravelias arrested for attempting to defend himself against her false accusations in her Stalking Petition. To disprove her malignant claims about what he had actually said to her, he introduced a sentimental, happenstance cell-phone audio recording he had made with a popular Android smartphone app outdoors during his date proposal to her. Unbeknownst to Mr. Maravelias, the victim, this is apparently illegal in New Hampshire and called “wiretapping”. For context, unlike the “minor” Petitioner, Maravelias has not had a drink in years, is chaste, and refrains from criminal perjury.

3. In a 6/15/18 Order signed by Judge John J. Coughlin, this Court extended Petitioner’s Stalking Order.

A. THIS COURT’S FINDING THAT THE PETITIONER HAS FEARED “FOR HER PERSONAL SAFETY” IS LAUGHABLY ABSURD, GIVEN HER DOCUMENTED CONDUCT OF CRUELLY BULLYING MR. MARAVELIAS ON THE INTERNET WITH VULGAR GESTURES DURING THE PENDENCY OF HER FRAUDULENT STALKING ORDER, IN A FAILED ATTEMPT TO GET HIM TO VIOLATE IT AND HAVE HIM ARRESTED, SHOWING HER MALICIOUS BAD-FAITH AND FULL CONFIDENCE THAT HE IS A NON-VIOLENT AND LEVEL-HEADED PERSON

4. Petitioner’s testimony and Respondent’s accepted exhibits in this case both established that the Petitioner made a public social media post specifically directed at Respondent on 6/21/17.
5. Her inciting, harassing, and vulgar post against Mr. Maravelias pictured herself with her father and 21-year-old boyfriend, all three parties middle-fingering the camera to insult Mr. Maravelias that he had failed to have a relationship with Petitioner and was then subject to her falsified restraining order.
6. At the Hearing, Petitioner also confessed to posting another image wherein her boyfriend addressed Mr. Maravelias with incendiary remarks. This was after the Petitioner lied about having “fear” of him.
7. To put it lightly, this Court’s conduct is shocking and reckless in condoning Christina DePamphilis’s and David DePamphilis’s 1) willful legal abuse through a bad-faith Stalking Petition, 2) perjury about having any “fear” of the Respondent, and 3) outright provocative bullying against Mr. Maravelias in said social media post(s), by *actually granting* her Motion to Extend a Stalking Order wherein the roles of victim and perpetrator are undeniably reversed.

8. This Court turns a blind eye to Petitioner's public interpersonal terrorism against Mr. Maravelias on social media and her documented illegal acts (such as her underage alcoholic intoxication pictured in Respondent's exhibit(s) and even *in her own*), but has no qualms about issuing a baseless extension against Respondent even when the "personal safety" of the Petitioner was clearly never threatened.
9. This Court then dares the audacity to uphold its recent ruling inculcating *Mr. Maravelias of "bad faith" conduct* in his honest Stalking Petition against David DePamphilis, in an Order dated 6/14/18¹.
10. This Court has woefully calpested the natural rights of Respondent through inexcusable, biased conduct and should expect to be sanctioned accordingly by higher state and/or federal authorities.

B. THE PETITIONER, CHRISTINA DEPAMPHILIS, HAS ABSOLUTELY NO CREDIBILITY, AS MARAVELIAS IRREFUTABLY DOCUMENTED HER DELUSIONAL, REVISIONIST MEMORY AND/OR OUTRIGHT WILLFUL LYING AT MULTIPLE OCCASIONS DURING THE HEARING; THE COURT THEREFORE ERRS TO RELY UPON HER MATERIAL REPRESENTATIONS

11. This Court granted an extension on a Stalking Order in which the Petitioner's lies or false representations of fact, in whole or in part, are beyond dispute. Respondent submitted her testimony transcript from the 1/5/17 Hearing wherein she admitted to falsely inserting words into Maravelias's mouth, confessing he never said the phrase "you will learn to love me" as she alleged in her Petition.
12. The Court also saw a cell-phone video of a 2013 Turkey Trot outdoor event showing Petitioner walking across a crowd to interrupt Respondent's conversation with friends and say hello to him, when her false Petition perjuriously claimed that "*he* came up to [*her*]" and made her "scared".
13. This Court sat back and watched as the Petitioner perjured during the Hearing, as Maravelias pointed out in testimony, yet still granted her abusive extension. The Petitioner claimed the sole purpose for her demeaning middle-finger post against Mr. Maravelias was "to let him know" that she knew he could view the account. But, Maravelias then revealed a posting from her same social media account two days prior to the 6/21/17 vulgar post, which had *already directly identified* Maravelias on 6/19/17.

¹Maravelias's unnecessarily polite Motion to Reconsider in that matter had documented clear facts and points of law overlooked by this Court's oppressive award of attorney's fees, even to the extent that one of the granted expenses was dated from *months before Maravelias even filed his truthful Stalking Petition*. That this Court would wholly ignore this fact and all others raised in a knee-jerk, thoughtless, nondescript, and hastily-scribbled rejection of said motion in entirety is reminiscent of its reckless finding in the instant case. Clearly, this Court automatically disregards all of Maravelias's presented facts and arguments, and is but a slave unto the contrived optics of the side flashing a 17-year-old female before the Court and whining baselessly about "victimization". Thus, judicial malpractice has obstructed a fair outcome for Mr. Maravelias.

14. The 6/19 exhibit (which Petitioner didn't know Respondent had) also shows her dishonesty in claiming to be the "only one who knew" to whom the vulgar gestures were directed. Her boyfriend addressed Maravelias in her 6/19 post; therefore, he and, by extension, David DePamphilis, all knew exactly whom they were bullying in the 6/21/17 post². For this Court to validate a bold liar of such turpitude by extending her falsified order against the victim is shameful, rash, and utterly emetic.
15. This Court's Order has thus endorsed a felony crime under the perjury statute (RSA 641:1): willful misrepresentation of fact in a protective order case. Ergo, it is noted that this Court does not operate whatsoever according to the laws of the land, but rather only to its arbitrary and capricious diktats³.

C. THE COURT'S ORDER IS BLATANTLY ERRONEOUS INsofar AS IT RELIES UPON A WRONG FINDING THAT RESPONDENT HAS AN "OBSESSION" WITH THE PETITIONER "TO THIS DAY", WHICH NEGLIGENTLY IGNORES A MOUNTAIN OF EVIDENCE AND TESTIMONY TO THE CONTRARY CONVENIENTLY IGNORED BY THE COURT'S ORDER

16. The Court cites Respondent's wrongly-pluralized "letters" (Maravelias's 11/2017 reply to Attorney Brown's legal threat) and "emails" (Maravelias's private complaint email to an honor society) as indications of a "strange, perverse and unhealthy obsession" he allegedly has for the Petitioner.
17. This wanton act of libel against Mr. Maravelias is highly disturbing, considering that both referenced communications 1) enthusiastically declared his *disgraced disinterest* in the Petitioner, 2) were made to parties *other than* Petitioner, and 3) fulfilled a legitimate purpose of responding to a legal threat and complaining to a public honor society in a *private email* to a close mentor of his, respectively.
18. The Court unethically abuses its judicial immunity in libeling Maravelias in this fashion, misconstruing his rightful "letter" and "email" completely out of context as "obsessive" acts. The

²Respondent also noted for the Court that Christina DePamphilis deleted her public social media account containing these posts mere days before filing her Motion to Extend on 1/5/18. Also, the Court's "obsession" finding attempts to make a medical, psychological finding when the testimony of an expert in the field would be necessary to sustain a finding of "obsession".

³This Court's illegal misconduct with Stalking Orders is hardly new or unusual. For instance, this Court recently granted a Stalking Final Order of Protection in *Mary Peterson v. Richard Garrigus* (431-2018-CV-0089) on 6/4/18 with a written Order containing absolutely no specific findings of fact articulating a "stalking" "course of conduct" whatsoever. This flies in the face of judicial requirements imposed by the NHSC. (*See Fisher v. Minichiello*, 155 N.H. 188, 193, 921 A.2d 385 (2007) "We have interpreted RSA 633:3-a, II(a), since it 'contains an enumerated list of prohibited conduct,' to require trial courts to make specific findings as to the course of conduct warranting a final stalking order.", *South vs. McCabe*, 943 A.2d 779 (2008) "The trial court failed to make such findings in this case. The final stalking order ... gives no indication of either the facts or the reasoning upon which the trial court based its decision. Both this court and the respondent are thus left to speculate as to the precise nature of the trial court's findings, and whether sufficient evidence was in fact introduced to support them. We therefore vacate the final stalking order and remand. *Kiesman*, 156 N.H. at 482, 937 A.2d at 919.")

record reflects they were actually *self-defensive expressions* begotten of the same false accusation of “obsessive”, stalking behavior. Given these outrageous comments in its finding, it follows that the Court too has a “stalking obsession” with Mr. Maravelias, since it has engaged in the exact same act as his “letter” and “email”: *i.e.*, writing in a detached, objective fashion about someone’s perceived wrongdoing. If such acts of speech signify a “stalking obsession”, then everyone is a “stalker”.

19. Judicial estoppel prevents Petitioner from stating Respondent has an ongoing “obsession”, since even her counsel termed it a “previous obsession” in a recent filing. Therefore, to fuel its verbal posturing against Mr. Maravelias in its finding, this Court asserts an unspecified liberty to make representations against him even beyond what Petitioner and counsel themselves alleged.

20. Respondent also testified amply to his disinterest in his legal abuser, the Petitioner, disclosing that her recent corpulence inhibited his ability *to even recognize her* when seen in the Court parking lot.

D. THE COURT’S WRITTEN FINDINGS OF “REASONABLE FEAR” AND AN “OBSESSION” CONFLICT WITH ITS ACCURATE STATEMENTS IN THE HEARING AND THUS FORM AN ABUSE OF DISCRETION

21. On 6/8/18, the Court accurately remarked while listening to Respondent’s closing argument,

“You indicated that you don't want to have anything to do with the family, you don't want to have anything to do with this young woman, and you just want to be left alone and you're going to leave her alone - at least that’s my impression, and that’s what you’ve indicated.” (Hon. John Coughlin, 12:03:02pm 6/8/18)

22. But, on 6/15/18, the Court impetuously defamed Maravelias with the following amplified verbal posturing in its Order: “[Respondent’s acts of private speech] clearly demonstrate a strange, perverse and unhealthy obsession by the Petitionee towards the Petitioner which ... continues to this day.”

23. This inconsistency is confusing and inexplicable. The Court’s palpably insincere self-contradiction regarding a “present” “obsession” by Respondent must therefore be estopped, and its Order vacated.

24. The same is true concerning the Order’s unsupported finding of “reasonable fear” given the Court’s following 5/3/18 remark during cross-examination of Petitioner:

“I think you had a good point there in terms of posting this, and where it was posted, and the circumstances, and the context, and whether or not she felt a concern for her personal safety or well-being.” (Hon. John Coughlin, 2:42:57pm 5/3/18)

E. THE COURT WRONGFULLY BASED ITS EXTENSION DECISION ON PHOTOGRAPHS PETITIONER INTRODUCED OF RESPONDENT’S PRIVATE SENTIMENTAL ARTIFACTS IN HIS BEDROOM FROM YEARS AGO WHICH IN FACT DEPICTED HIS LONG-PRIOR ATTRACTION THERETO, BEFORE HER

LEGAL ABUSE OF THE VICTIM WITH A FALSE STALKING PROTECTIVE ORDER, AND NOT AT ALL NOT DURING THE PENDENCY OF THE STALKING ORDER

25. On 6/8/18, after the Petitioner had rested, she submitted four photographs of Respondent's private interior bedroom and office space, dated 4/6/17.
26. Respondent testified that the pictures snapshotted a state of existence from *prior to* his victimization in the false "stalking" matter, since he had been living at college and not in the pictured space substantially or entirely from late December 2016 through April 2017.
27. That the Court would bestow validation upon the Petitioner's bad-faith, malicious attempt to humiliate Mr. Maravelias with such irrelevant intrusions of his privacy by daring to libel him a further "stalker" just because he once put a motivational quote on his wall constitutes a strange, perverse, and unhealthy exercise of discretion by this Court in clear prejudice of the Respondent.
28. Respondent is victim of a corrupt judicial tyranny which violates his Fourteenth Amendment right to privacy by injunctively penalizing him for exercising his full right to have "coke bottles" in his room and "motivational phrases" on his wall, even regardless of these happenstances' past-nature.
29. In the past year, Christina DePamphilis has 1) incessantly, falsely complained to the police to try to get Maravelias arrested, 2) illicitly collected pictures of Maravelias's private bedroom without his knowledge, and 3) cruelly targeted Maravelias with vulgar, incitative gestures on the web – all while Maravelias remained silent to her and ignored her attempts for attention. Who is the "stalker"?

F. THE SAID PHOTOGRAPHS WERE UNLAWFULLY OBTAINED BY WINDHAM POLICE IN TORTIOUS EXCESS OF THE LIMITED TERMS OF THE SEARCH WARRANT GRANTED IN THE AUDIO RECORDING MATTER IN WHICH PETITIONER FURTHER ABUSED MR. MARAVELIAS; THE COURT MAY THEREFORE NOT LAWFULLY RELY UPON THEM

30. The said photographs were taken by Windham Police during an unconstitutional raid on Maravelias's house to seize his digital property for evidence of his banal sentimental cell-phone recording.
31. The terms of the search warrant were highly specific. Taking pictures of unrelated sentimental objects/fixtures on the Respondent's bedroom wall grievously exceeded the scope of the warrant and violated Respondent's Fourth Amendment and Fourteenth Amendment rights. The exclusionary rule enjoins this evidence, taken illegally by a *government agency*, from being used against Respondent.

G. THE COURT'S GRANTING PETITIONER'S EXTENSION MOTION IS ERRONEOUS SINCE HER MOTION IS PATENTLY UNREASONABLE, AS RESPONDENT'S ALLEGED CONDUCT, EVEN IF PROVEN, DOES NOT THREATEN HER "SAFETY OR WELL-BEING"

32. Petitioner's Motion to Extend is rooted in her complaint that Maravelias sent an email to one of his teachers and responded to an attorney's threatening letter, claiming that she is a "disreputable whore".

33. To find that Respondent's provoked, offensive, and accurate language to a person who is not the Petitioner could possibly constitute a threat to her "safety or well-being" is groundless and asinine.

H. THE COURT'S ORDER EGREGIOUSLY VIOLATES RESPONDENT'S STATE AND FEDERAL CONSTITUTIONAL RIGHTS SINCE IT RELIES UPON HIS TWO ACTS OF CONSTITUTIONALLY PROTECTED, LAWFUL SPEECH MADE FOR A LEGITIMATE PURPOSE

34. The Respondent denied authorship of Petitioner's Exhibit 1, which was not sent to Petitioner's whole "family" but to David DePamphilis. Respondent's only acts of speech cited in the Court's order for which he is actually responsible were made for legitimate, constitutionally valid purposes.

35. *I.e.*, Respondent's 1) response to Attorney Brown's threatening letter and 2) private email to his high school mentor who also runs the public honor society are acts of free speech lying entirely outside the narrow categories of First Amendment protection exceptions, such as "fighting words" or obscenity.

I. THE COURT'S ORDER IS NULL AND VOID SINCE RESPONDENT WAS NOT GIVEN A FAIR TRIAL

I. (a) THE COURT ILLEGALLY LIMITED HIS RIGHT TO VIDEOTAPE THE HEARING AND ENABLED PETITIONER THEREBY TO PERSIST IN HER DISHONEST, BAD-FAITH CONDUCT AGAINST THE VICTIM

36. In keeping with its known habit of delegating unto itself powers found nowhere in the law, this Court granted the Petitioner's obscurantist motion to limit Respondent's right to videotape the entirety of the public hearing on Petitioner's Motion to Extend the Stalking Order in this case.

37. Respondent had shown the Court its own rule (District Court Rule 1.4) which permits any person to "photograph, record and broadcast all court proceedings that are open to the public" and gave "advance notice" as required. The rule further states in 1.4 (e), "no court or justice shall establish notice rules, requirements or procedures that are different than those established by this rule."

38. Since this Court operates entirely outside the boundaries fixed by written rules and laws, it nonetheless granted Petitioner's request to partially limit Respondent's right to videotape, prohibiting that the "minor" Petitioner be videotaped. The Court endorsed her pictured underage illegal substance

consumption and online criminal harassment (RSA 644:4) of Maravelias by granting the extension, yet made sure to protect her face from being videotaped *in her own open-to-the-public* Hearing. This error substantially interfered with Maravelias’s right to a fair trial, since it enabled Petitioner to persist in her storied dishonesty while testifying, without the accountability of being videotaped.

I. (b) THE COURT DISOBEYED THE WITHIN-30-DAYS HEARING REQUIREMENT OF 633:3-A III-c

39. The Petitioner filed her Motion to Extend on 1/5/18, with the temporary extended Stalking Order, pending hearing, issued on 1/12/18 by Judge Sharon DeVries. Respondent objected, and a Hearing was finally scheduled for Thursday 2/15/18 – 34 days thereafter. Furthermore, the Court did not actually afford Respondent an opportunity to hold the Hearing until 2/20/18 – 39 days after extension.
40. Since the Court violated Respondent’s state and federal constitutional rights to a speedy trial, and even violated the specific statutory requirement in RSA 633:3-A III-c, the extended Order is null and void. (*see Id.*, “A defendant shall have the right to a hearing on the extension of any order under this paragraph to be held within 30 days of the extension.”)

J. THE COURT MAY NOT EXTEND AN ALREADY-ILLEGAL STALKING ORDER ISSUED IN PLAIN-ERROR CONTRAVENTION OF PERTINENT STATUTORY LAW AS INTERPRETED BY THE SUPREME COURT; THE COURT FAILED TO EVEN RULE ON A MOTION TO DISMISS ON THIS ISSUE

41. As documented in Respondent’s ignored 3/29/18 Motion to Dismiss, the original Stalking Order was issued in violation of the advance notice requirement of RSA 173-B:3 as clarified by NHSC case law.
42. Thus, it is unfair to subject Respondent to a different and lower standard of Stalking Order extension (633:3-a III-c.) predicated on a valid initial finding of stalking *in principio* (a higher standard under 633:3-a III-a.) when such an original finding of stalking was never lawfully made in this matter.

K. THIS COURT’S ACT OF IGNORING RESPONDENT’S TWO MOTIONS IN THIS CASE AND NEGLIGENT FAILURE TO SPECIFICALLY ADDRESS HIS ARGUMENTS AND EVIDENCE IN ITS FINDING CONSTITUTE A CLEAR VIOLATION *INTER ALIA* OF MARAVELIAS’S FOURTEENTH AMENDMENT SUBSTANTIVE AND/OR PROCEDURAL DUE PROCESS RIGHTS

43. Respondent filed a Motion to Dismiss Extension and Vacate Stalking Order dated 3/29/18 and a Motion for Discovery dated 5/29/18 in the case at bar. The opposing party filed reply briefs to both motions. The Court heard oral argument on these motions from both parties on 6/8/18 at the Hearing.

44. The Court's 6/15/18 Order granting extension completely ignores these motions, as well as the legal issues they raised. The Court simply cast them out into the wind, refusing to rule on them either way.
45. In neglecting to perform its required "ministerial act" of ruling on critical motions, the Court violated Maravelias's federal due process rights and state constitutional right "to be fully heard in his defense".

L. THE STALKING STATUTE IS FACIALLY INVALID AND/OR INVALID AS APPLIED ACCORDING TO THE STATUTORY OVERBREADTH AND/OR VAGUENESS DOCTRINES, AS THE COURT BASELESSLY FOUND LAWFUL SPEECH TO THIRD PARTIES TO CAUSE "REASONABLE FEAR" AND THREATEN PETITIONER'S "SAFETY AND WELL-BEING"

M. THE COURT'S FINDING THAT RESPONDENT'S COMMUNICATIONS CREATED "REASONABLE FEAR" IS INCORRECT AND/OR INVALID, SINCE RESPONDENT NEVER EXPLICITLY THREATENED PETITIONER NOR IMPLIED HARM TO ANYONE, AND SINCE NONE OF HIS CONDUCT WAS OBJECTIVELY LIKELY TO BE FOLLOWED BY VIOLENCE OR CRIME

N. PETITIONER'S NEW SURPRISE-ACCUSATION OF "OBSESSIVE" CONDUCT WITH THE 4/6/17 PICTURES APPEARED NOWHERE IN HER EXTENSION MOTION; THE COURT AGAIN VIOLATED RESPONDENT'S RIGHT TO ADVANCE NOTICE OF ACCUSATIONS BY RELYING ON THEM

O. THIS COURT'S ORDER IS INVALID INsofar AS IT IS PUNCTUATED BY AN ENTIRELY UNSUPPORTED "*SOLE PURPOSE OF HARASSING AND STALKING THE PETITIONER*" COMMENT WHICH IS BUT A PUSILLANIMOUS ACT OF VERBAL POSTURING TO MAKE THE OUTRAGEOUS EXTENSION ORDER SOUND REASONABLE; THE COURT OPERATES WELL OUTSIDE ITS GENERAL EQUITABLE POWERS IN SLANDERING MR. MARAVELIAS, THE VICTIM, AS ENGAGED IN THE CRIME OF "STALKING" WITH SUCH GRATUITOUS *OBITER DICTA* EXPRESSED ALONGSIDE NO FACTUAL BASIS THEREFOR WHATSOEVER

46. This illogical comment in the Court's Order would have one believe that Mr. Maravelias's choice *to respond to Attorney Brown's letter threatening him with a lawsuit* was not a "legitimate" "behavior", and that said act of responding to the threatening letter shows a "sole purpose" of "stalking" the daughter of Attorney Brown's client. While such a creative endeavor of absurdity might be humorous elsewhere, it is right-appalling within a context where Respondent's basic liberties are at stake.

47. This Court's automatic, reflexive rejection of any and all of Mr. Maravelias's evidence or arguments in toto against Petitioner and/or her father in its findings has become an irrefutable pattern, especially given its unsustainable exercise of discretion in the related Petition against Mr. DePamphilis which completely ignored all of Mr. Maravelias's truthful evidence (testimony, letters, and pictures) and instead asserted an imagined, alternate reality wherein Maravelias gave "no credible evidence".

48. This Court attempts to obfuscate such behaviors by acting in a fair, impartial, and permissive fashion during public hearings to admit all sorts of evidence it later categorically discards when making findings, pretending such evidence never existed and neglecting its duty to rule on key Motions.
49. Seen in conjunction with the baseless defamatory comments of fine-tuned verbal posturing in this Order, clear signs of systematic judicial corruption are noted. This Court, an office whose duty is the impartial arbitration of justice, has cowardly prostrated itself before the authoritarian altar of false victim advocacy and feminist incapacity to favor a male *pro se* Respondent against a younger lawyer-represented female Petitioner, even with a mountain of irrefutable facts and laws so necessitating.

WHEREFORE, the foregoing compels the Respondent to pray this Court:

- I. Grant this Motion;
- II. Reverse its 6/15/18 Order granting Petitioner's Motion to Extend Stalking Order;
- III. Painstakingly review legal theory and case law in this area to appreciate the severity of infringement against Respondent's free speech rights which said Order does impose until corrected, with the suggested literature^{4,5,6}, to prevent further unconstitutional errors; and
- IV. Issue an Order of declaratory relief apologizing to Mr. Maravelias for the baseless defamatory comments against him in this Court's 6/15/18 Order and recanting the same.

Signed and submitted,

PAUL J. MARAVELIAS,
in propria persona



June 25th, 2018

⁴ Volokh, Eugene. "One-to-One Speech vs. One-to-Many Speech, Criminal Harassment Laws, and Cyberstalking." *Nw. UL Rev.* 107 (2012): 731.

⁵ Buchhandler-Raphael, Michal. "Overcriminalizing Speech." *Cardozo L. Rev.* 36 (2014): 1667.

⁶ Volokh, Eugene. "The Freedom of Speech and Bad Purposes." *UCLA L. Rev.* 63 (2016): 1366.